

PUBLIC DISCLOSURE

January 11, 1999

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Security Bank of Nevada

#000272469

530 Las Vegas Boulevard South

Las Vegas, Nevada 89101

Federal Reserve Bank of San Francisco

101 Market Street

San Francisco, California 94105

Note: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the Community Reinvestment Act (CRA) performance for First Security Bank of Nevada prepared by the Federal Reserve Bank of San Francisco, the institution's supervisory agency, as of January 11, 1999. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to CFR Part 228.

INSTITUTION

INSTITUTION'S CRA RATING: This institution is rated satisfactory.

First Security Bank of Nevada (FSB) has exhibited a level of responsiveness in line with its business banking strategy and generally consistent with its resources and capabilities. As a \$1.1 billion institution of a multi-bank holding company, First Security Bank has access to significant resource strength and expertise to facilitate a strong response to identified needs. This support environment has enabled the bank to concentrate its business strategy on the credit needs of commercial enterprises within its assessment area. Lending is evident in low and moderate-income geographies, and the majority of originations have been extended to the small business sector of its community. The Evaluation notes that this profile is consistent with overall satisfactory performance with respect to those communities within close proximity to where the bank has branches. However, its lending levels relative to its capacity to serve and opportunities in its defined assessment area indicate potential for growth.

The Evaluation notes that the bank's branch strategy has focused on following the patterns of small business growth. Given the bank's business focus, this strategy is appropriate and has facilitated reasonable access to its products and services. However, although the bank has implemented an alternative service strategy to accommodate deposit-related needs of businesses a distance from its branch locations, a similar strategy aimed at bolstering lending levels consistent with its capacity was not evident. The Evaluation does note, however, that as a supplement to its direct lending efforts, the bank has made investments that reflect a good level of support of community development efforts which benefit its assessment area.

PERFORMANCE LEVELS	NAME OF FINANCIAL INSTITUTION		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	
Low Satisfactory	X		X
Needs to Improve			
Substantial Noncompliance			

**Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.*

DESCRIPTION OF INSTITUTION

First Security Bank of Nevada is a business-oriented retail bank that was established on January 31, 1982, in Las Vegas, Nevada. The bank is a subsidiary of First Security Corporation (FSC), a multi-bank holding company based in Salt Lake City, Utah. As of September 30, 1998, FSB had total assets of \$1.1 billion¹ and operated 15 full service branches located in Clark County, Nevada. The bank's business strategy is to provide relationship-based deposit and loan services to business customers within its assessment area. This commercial lending focus is part of FSC's strategy to deliver credit products efficiently and effectively through its subsidiary banks based on their resource capacity and lending expertise. As of September 30, 1998, FSB's loan portfolio showed a distribution² that reflects the bank's wholesale focus:

Loan Type	Dollar Amount (000s)	% of Total
Commercial & Industrial	\$161,535	40.1%
Non-Farm & Non-Residential Real Estate	\$163,387	40.5%
Secured by 1-4 Family Residential Property	\$14,590	3.6%
Credit Card and Consumer Loans	\$11,391	2.8%
Construction & Land Development	\$39,604	9.8%
Secured by Multi-Family Residential Property	\$487	0.1%
Lease Financing	\$11,471	2.9%
All Other	\$536	0.2%
Total	\$403,001	100%

The bank has selected an assessment area that consists of all census tracts within Clark County, Nevada. The assessment area reflects an area the bank can reasonably serve given its branch structure and business lending strategy. There is no evidence of illegal discrimination or conspicuous gaps in the assessment area. Further, there are no financial constraints or legal impediments that would inhibit the bank from lending throughout its assessment area consistent with its size, financial resources, and local economic conditions. In fact, the resource strength of FSC, coupled with the institution's lending capacity measured in part by its average loan-to-deposit ratio, position the bank to respond affirmatively to the credit needs of its assessment area.

For the eight-quarter review period, FSB's average loan-to-deposit ratio is 47.58 percent. When compared to its two local peer averages of 57.46 percent and 60.73 percent, the bank's ratio is below average. The bank's low loan-to-deposit ratio can be attributed, in part, to the "business line" strategy developed by FSB's holding company. This special lending focus by the bank accommodates its resource limitation, such as the lack of extensive back room operations needed to support consumer and mortgage loan activity. As First Security Bank of Nevada originates business-purpose credit, it looks to its affiliate, First Security Bank, NA, to originate real estate construction, home mortgage, consumer, and gaming industry loans within its

¹ Source: September 30, 1998 Consolidated Reports of Condition and Income

² Source: September 30, 1998 Consolidated Reports of Condition and Income

market. The majority of loans made in Nevada by the bank's affiliates are extended in Clark County. As of December 31, 1998, FSB affiliates showed the following loan portfolio of \$919 million in the state of Nevada:

Loan Type	Dollar Amount (000s)
Real Estate Construction	\$194,697
Real Estate Home Mortgage	\$186,756
Consumer	\$297,419
Gaming Industry	\$240,000
Total	\$918,872

The bank's previous CRA examination, as of January 21, 1997, resulted in a satisfactory performance rating.

DESCRIPTION OF ASSESSMENT AREA

First Security Bank of Nevada's assessment area encompasses all of Clark County, Nevada, which is a part of the Las Vegas, NV-AZ Metropolitan Statistical Area (MSA). Besides Clark County, this MSA also consists of Nye County in Nevada and Mohave County in Arizona. Clark County, located in southern Nevada, contains 121 contiguous census tracts of all income levels and includes the cities of Las Vegas, Henderson, North Las Vegas, Boulder City, and Mesquite. Depicted in the following table is the income composition of the tracts in the bank's assessment area, along with the corresponding population and number of families that resided within them as of the 1990 U.S. Census.

Census Tract Income Levels

Income Level	Total Census Tracts		Total Population		Total Families	
	#	%	#	%	#	%
Low	7	6%	26,370	4%	5,249	3%
Moderate	21	17%	115,539	15%	26,681	14%
Middle	59	49%	356,306	48%	91,377	48%
Upper	34	28%	245,902	33%	68,546	35%
Total:	121	100	744,117	100	191,853	100%

Included in the bank's assessment is the Las Vegas "Strip." A part of Las Vegas Boulevard, it began in the 1940's as a two-lane highway leading from Los Angeles to Las Vegas. It is now lined with megaresorts and attractions which cater to the city's millions of tourists and conventioners. The casino gaming industry is the largest employer in Clark County and contributes \$6.4 billion to the local economy.

The median family income for the assessment area is \$35,170, slightly above that of the MSA of \$33,965. Population statistics³ for the State of Nevada show a total population of 1,781,750, of which 1,192,200, or 67 percent, of the people reside within Clark County. Both the county and the state have experienced rapid growth with the population of Clark County steadily outpacing the state. Growth rates from the period of 1995 to 1997 reflect 15 percent for the county and 12 percent for the state. It is currently estimated that approximately 6,000 people move to and 3,000 people move out of southern Nevada each month, making Clark County the fastest growing county in the nation.

As of November 1998, the unemployment rate in Clark County was 3.3 percent, comparable to the state's unemployment rate of 3.3 percent, but below the national rate of 4.4 percent. According to U.S. Census Bureau data, the majority (approximately 54 percent) of the jobs in Clark County emanates from the service industry, with approximately 30 percent of the service industry jobs concentrated in the hotel and lodging sector of the market. All of the growth in Clark County has been driven by existing industries, particularly the gaming industry with its myriad of casinos. The convention industry, which hosts approximately 3,000 conventions, meetings, and trade shows annually, also plays an important role in keeping unemployment rates at an acceptable level.

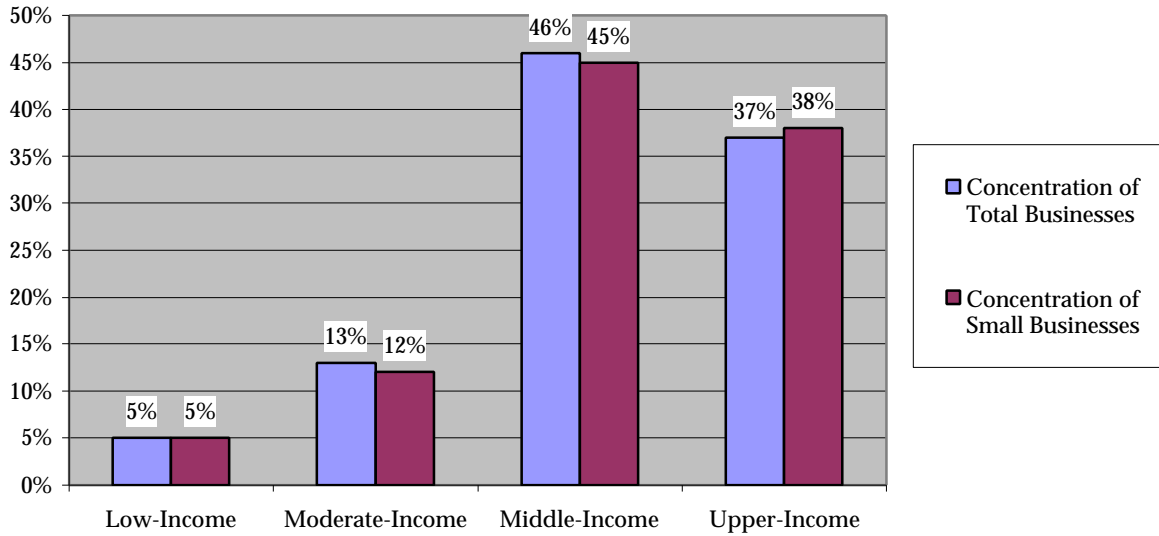
The steady increase of new residents has fueled growth in the construction industry. In 1996 and 1997 combined, over 59,000 housing units were permitted. An analysis of in-migration and housing stock performed by the Las Vegas Study, using home permits issuance as well as vacancy rates, suggests that the housing needs of the area are being met. Nonetheless, a community contact conveyed that the cost of housing is prohibitive. Additionally, the availability of affordable housing is minimized by units requiring much-needed rehabilitation in an environment where contractors focus on new construction.

Although the bank's assessment area contains many large businesses, including the casinos and hotels on the Las Vegas "Strip," the vast majority of businesses located in the assessment area are considered small businesses. An analysis⁴ of businesses operating in the bank's assessment area noted that approximately 88 percent of the 28,241 businesses are small businesses, with gross annual revenues equal to or less than \$1 million. This number was corroborated by two separate community contacts that attributed the continued growth in small businesses to the continued influx of new residents and subsequent construction of additional housing. These community contacts also emphasized the continued need for small business loans, particularly for start up entities in the bank's assessment area. The distribution of small businesses correlates to areas of significant growth in Las Vegas and is concentrated in the western and southern portions of the metropolitan Las Vegas area. As depicted in the following graph, the substantial majority of all businesses are located in middle- and upper-income census tracts with a similar distribution for small businesses.

³ Study prepared by The Center of Business and Economic Research (CBER) of the University of Nevada, Las Vegas (Las Vegas Study)

⁴ Source: 1997 Dun & Bradstreet data for the bank's assessment area in Clark County

Distribution of Businesses Within Assessment Area



Notwithstanding the growth in Clark County, areas exist that continue to warrant special needs to facilitate development. In December 1994, nine census tracts⁵ (six low-income and three moderate-income tracts) within the assessment area were designated as the Southern Nevada Enterprise Community, more commonly referred to as enterprise zones. Under this program, federal monies are allocated to create and support initiatives to increase employment, personal, and entrepreneurial opportunities, including job training and childcare assistance, among others in these enterprise zones. Part of this program includes a loan guarantee fund, created with funds from the U.S. Department of Housing and Urban Development. Lending opportunities exist for banks under this program, as participating lenders grant loans that are guaranteed by federal monies. The loans may be for a variety of business purposes and are granted in amounts ranging from \$5,000 to \$100,000. In order to be eligible, the borrowing businesses must be located in, or relocating to, one of nine designated census tracts.

Another area that has undergone targeted redevelopment in Las Vegas is the downtown casino gaming area, now called the “Fremont Street Experience.” Downtown Las Vegas was the original gaming “strip” and has experienced a steady decline in gaming revenues and a gradual decline of its infrastructure because of the construction of megaresorts on the northern end of the Las Vegas “Strip”. The Fremont Street Experience was designed to redevelop downtown Las Vegas into a resort destination, bringing tourists back to the area and creating opportunities for small business expansion operating in this low- and moderate-income area.

⁵ Census tracts 35.00, 36.02, 3.02, 3.01, 4.00, 11.00, 5.04, 38.00, and 39.00.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

SCOPE OF EXAMINATION

The evaluation of FSB's performance under the Community Reinvestment Act focused on the bank's lending, investment, and service activities for the period of January 1, 1997, to December 31, 1998.

Under the lending test, examiners reviewed FSB's small business lending activity, as it represents a major portion of the bank's loan portfolio and is indicative of its business current banking strategy. The investment test assessment included an evaluation of the bank's securities portfolio, grants, donations, and other investments purchased by the bank during the review period. In conjunction with the service test, examiners evaluated the bank's branch locations, retail banking services, and alternative banking delivery systems. In addition, examiners reviewed community development services provided by bank employees within its assessment area.

LENDING TEST

First Security Bank adequately services the credit needs of its assessment area as reflected by its small business lending performance. Given its resources and capacity, as measured by its total assets and branch structure, loans as a percentage of deposits, and loan growth trend over the past 24 months, lending levels are consistent with low satisfactory performance. The bank's strengths under the lending test are evidenced by the concentration of lending within its assessment area and a geographic loan distribution that reflects a responsiveness to areas, including low- and moderate-income, within close proximity to bank branches. In addition, the bank's strong record of lending to small businesses is reflected in the concentration of credit originations less than \$50,000.

Notwithstanding the bank's lending test strengths, the evaluation of performance noted that loan growth over the review period has largely been facilitated by its merger with another institution. As previously noted, the bank's average loan-to-deposit ratio ranks below its local peers. Its loan-to-deposit profile relative to its national peer is also below average and has evidenced a declining trend. The bank's growth strategy concentrates on expanding into areas where business growth is apparent. Resultant lending has been concentrated in areas within close proximity to the branches. While this strategy has not precluded the bank's response to geographies of all income levels, the bank's apparent, untapped lending capacity, as measured by the low loan-to-deposit ratio, suggest an ability to expand the geographic scope of lending within the defined assessment area. Such expansion will facilitate an overall increase in loan volume as well as a response to credit needs within low- and moderate-income areas of the bank's market.

Assessment Area Concentration

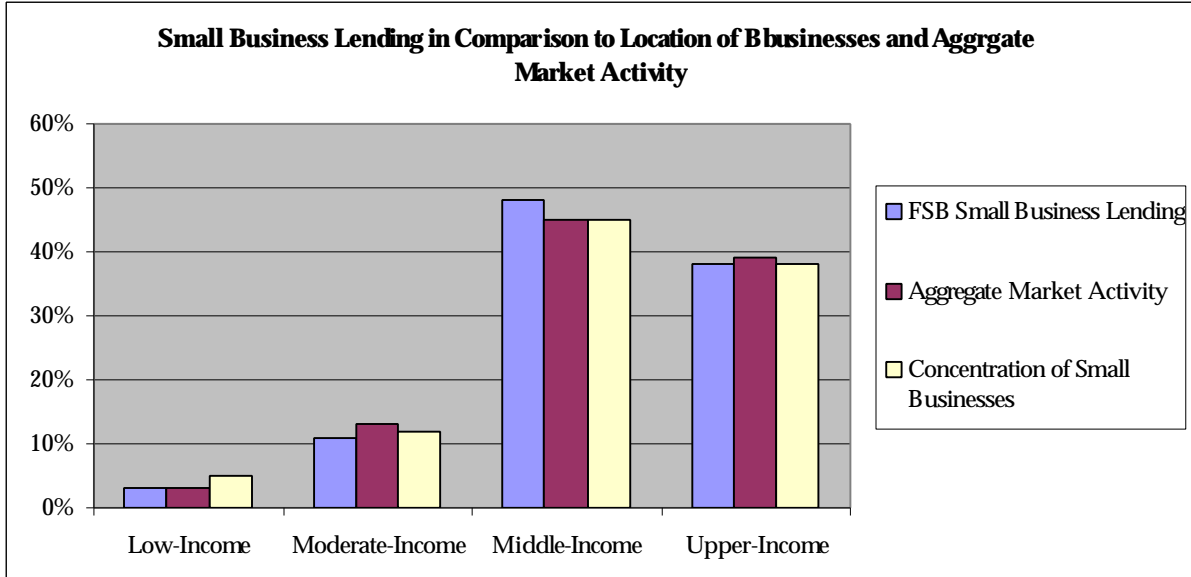
Almost all of loans reviewed for this Evaluation were originated within the bank's assessment area. An analysis of the bank's small business lending showed that 99 percent of both the total number and dollar volume of loans were extended within Clark County, Nevada.

Contributing to the bank's high level of lending inside of its assessment area is the demographic and geographic makeup of Clark County. Clark County, Nevada is located in the southern tip of the state and the majority of the county's population is concentrated in the Las Vegas area. Metropolitan Las Vegas is surrounded by large tracts of desert, mountain ranges, and military installations, which are sparsely populated and offer very few opportunities for small business lending.

Lending Distribution by Geography

The bank's record of lending throughout its assessment area, including in low- and moderate-income census tracts, shows a good distribution. The evaluation determined that the lending distribution was reasonably comparable to the concentrations of small businesses within the assessment area, given the lending opportunities available and competitive factors in the marketplace.

First Security Bank's small business lending is concentrated in the middle- and upper-income areas of southern and western Las Vegas. Dun and Bradstreet small business data shows that the highest concentrations of small businesses are also in middle- and upper-income census tracts with significantly lower numbers of small businesses in low- and moderate-income areas. The following chart illustrates the bank's record of lending by income level of geography to concentrations of small businesses and the aggregate market lending activity.



The bank has extended small business loans in census tracts of all income levels in proportion to the number of businesses located in each income category; however, the bank has not extended loans in a consistent manner among all the different income geographies within its assessment area. FSB’s small business lending is concentrated around its branch locations; areas where the bank does not have a retail branch show significantly less loan volume. Because of the bank’s business strategy of placing branches in high business growth areas, older portions of the city with lower concentrations of small businesses do not show comparable levels of FSB lending despite the bank’s capacity to lend.

Dun & Bradstreet 1997 aggregate market data indicates that small lending opportunities exist in low- and moderate-income areas. The bank’s ratio of small business loans to the number of small businesses shows higher loan penetrations to businesses in upper- and middle-income areas and lower loan penetrations to businesses in low-income neighborhoods. In part, this is due to the fact that the majority of newer small businesses are located in the upper-income growth areas of Las Vegas. Given the growth of businesses in the market, the number of credit requests from relatively new businesses is expected to be greater than that of more established businesses. Nevertheless, typical commercial bank financing to start-up or relatively new businesses represents a lower percentage of overall lending than that to more established entities. In the case of the needs in the bank’s assessment area, the aggregate Dun & Bradstreet small business loan data along with comments made by community contacts indicate that opportunities exist for additional small business lending in low- and moderate-income areas where more established businesses exist.

Aggregate Lender Data of Small Business Loans in Comparison to the Number of Small Businesses by Income Level of Census Tract

Income Level of Census Tract	Low-Income	Moderate-Income	Middle-Income	Upper-Income
# of Small Businesses	1165	3066	11096	9405
# of Loans	109	377	1632	1815
Penetration of Loans to Small Businesses	9.4%	12.3%	14.7%	19.3%

Given this profile, a more in-depth analysis of FSB's profile was conducted to assess fully its response to low- and moderate-income markets. The bank's branches are its primary delivery system for loans, and, as such, lending activity tends to be clustered around branch locations. Currently, the bank has one branch in a moderate-income tract, and there are no branches in low-income tracts. A market analysis of the seven census tracts immediately surrounding the FSB bank branch in the moderate-income area shows that the bank has extended the majority of all the reported small business loans in the branch's low- and moderate-income market. This profile of surrounding the branch locations reflects a strong response to small businesses in those low- and moderate-income areas.

**Penetration of Small Business Lending Surrounding First Security
Bank of Nevada's Branch in a Moderate Income Census Tract**

Census Tract	Income Level of Tract	# of Small Businesses	# of Loans	Aggregate Market Penetration	FSB Loans	FSB Loans as a % of Total Market
7.00	Low	358	44	12%	18	41%
11.00	Low	359	35	10%	12	34%
3.01	Moderate	104	8	8%	3	38%
8.00	Moderate	309	48	16%	18	38%
9.00	Moderate	303	46	15%	23	50%
2.02	Middle	570	60	11%	27	45%
12.00	Middle	364	32	9%	5	16%

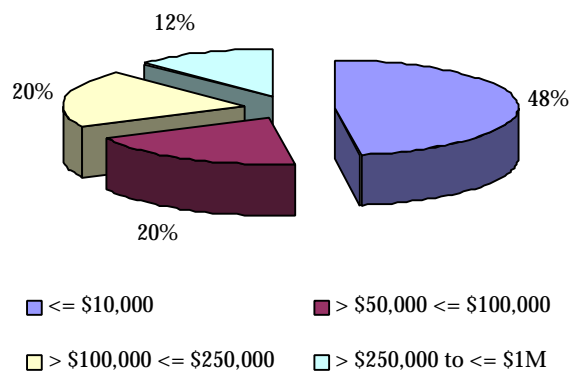
Given this demonstrated ability to respond affirmatively to low- and moderate income credit needs, the bank's funding capacity provides it with the ability to respond to the need for increased small business lending articulated during the examination. While the bank has relied on its branches as a primary vehicle for loan generation, the current branch strategy exposes the bank to missed opportunities. As noted earlier, the bank provides deposit related services to customers not located near a branch office, evidencing an ability to meet the needs of geographically dispersed customers in its assessment area. This, coupled with its untapped lending capacity and unmet credit needs of the assessment area, suggest room for enhanced performance under this criteria.

Lending Distribution by Borrower Income or Business Revenue

FSB's record of lending to businesses of different income levels shows a distribution that demonstrates a good response to the commercial credit needs within its assessment area, particularly those of small businesses.

Dun and Bradstreet data indicates that small businesses comprise 88 percent of all businesses in Las Vegas with the majority of these businesses being located in the western and southern areas of the city. An analysis of the bank's distribution of commercial lending by

Lending by Loan Amount Category



business revenue shows that 65 percent were extended to small businesses. The bank's distribution of small business loans by loan amount further evidences its focus on small business entities. As depicted in the chart, 68 percent of the bank's lending to small businesses is in dollar amounts typically associated with credit needs of newer and start-up small businesses. Forty-eight percent of FSB's small business loans were extended in amounts of \$50,000 or less, with an additional 19.7 percent extended in amounts between \$50,000 and \$100,000. Interviews with contacts within the business community revealed that loan amounts of less than \$100,000, and particularly loans amounts of less than \$50,000, are the most critical financing needed of the small business owners.

Community Development Lending

The bank has extended a low level of community development loans within its assessment area relative to its capacity to extend community development loans and affordable housing and other community development projects within Clark County. The bank's CRA Officer has identified several community development lending opportunities within the bank's assessment area; however, bank participation has been limited.

During the review period, the bank has extended three community development loans totaling \$3,871,185. The largest community development loan was for \$1.7 million and was used to construct a carpentry trade job training facility in Las Vegas designed to create higher paying job skills to minimum and low wage workers. The other two community development loans were used to construct single-family affordable housing units in the Las Vegas area.

The bank's community development loans lending activities have addressed identified employment and affordable housing needs within the assessment; however, given the bank's asset size, lending capacity and expertise and the opportunities available to support local development projects, the overall level of community development lending is considered low.

INVESTMENT TEST

Investment and grant activity is consistent with the bank's financial capacity. Overall, total donations and grants made within the community have grown over previous examination levels.

Investment and Grant Activity

As of December 31, 1998, the bank had participated in four qualified community investments totaling \$2,802,448, representing approximately three percent of FSB's investment portfolio. In addition, the bank has made \$83,300 in donations and grants to CRA qualified community organizations during the review period. During the years 1997 and 1998, the bank made total donations and grants of \$482,424, with the CRA qualified portion comprising 17 percent of the total. The bank has included CRA goals in its investment strategy and is currently exceeding these goals.

Responsiveness to Credit and Community Development Needs

Affordable housing has been identified as a primary need in the Las Vegas area, and the majority of the bank's CRA qualified investments have been targeted towards its creation and financing within the State of Nevada. Investments in affordable housing projects include \$2,297,448 in securities backed by home mortgages to low- and moderate-income borrowers and \$200,000 in bonds for the creation of affordable housing in the State of Nevada. In addition, the bank made a \$205,000 investment in a capital development fund to finance small businesses and invested \$100,000 in a certificate of deposit in a credit union that provides banking services to small businesses and consumers in a low-income area.

Grants and donations have been made to a variety of community organizations throughout the bank's assessment area. The largest single donation was to Boys Hope/Girls Hope of Nevada to assist in the education of "at risk" low- and moderate-income youth. Other large donations were made to Neighborhood Housing Services, which provides programs for low- and moderate-income homeowners and prospective homebuyers, and to the Urban Chamber of Commerce to sponsor a small business incubator project in a low-income area of Las Vegas. The bank has also made significant contributions to the local chapter of Habitat for Humanity, the Women's Development Center, and Classroom on Wheels. In addition to cash donations, the bank has provided computer equipment and fax machines to community organizations. In 1998, the bank donated 13 computers and one fax machine to CRA qualified community groups.

SERVICE TEST

First Security Bank of Nevada is providing retail banking and community development services at a low satisfactory level. Branch delivery systems are reasonably accessible to essentially all portions of the bank's assessment area, and the bank's record of opening and closing branches has not precluded it from service delivery in low- and moderate-income areas. However, the bank's expansion in middle- and upper-income markets and its strategy to focus lending in areas within close proximity to branches do present challenges for the organization to service outlying low- and

moderate-income areas despite its capacity to do so. Nonetheless, the bank is providing an adequate level of community development services and is participating in the development of its assessment area.

Retail Banking Services

The bank's retail delivery systems are generally accessible to all portions of the assessment area, and banking services are similar at each location. Retail services offered by FSB include branches, Automated Teller Machines (ATMs), consumer and commercial loans, and the bank's deposit courier service. Banking hours are from 9:00AM Monday through Thursday, 9:00AM to 6:00PM Friday, with only the Mesquite Branch offering hours on Saturday from 9:00AM to 1:00PM. ATMs are limited to only seven of the bank's 15 branches and, with the exception of the Mesquite Branch (located in a middle-income area), are located at branches in upper-income census tracts. Because of the bank's business focus, ATM usage is low and the distribution of bank ATMs is not a major factor in its provision of alternative banking services. The one branch in a moderate-income area is currently being remodeled and an ATM is being added at that location.

FSB's branch offices are located in moderate-, middle-, and upper-income areas. During the review period, FSB has built four branches in Las Vegas and has acquired American Bank of Commerce. The bank's acquisition of American Bank of Commerce added an additional four branches, one of which was located at 2980 West Sahara and in close proximity to an existing FSB branch at 3340 West Sahara, both in a middle-income census tract. The bank subsequently closed the 3340 West Sahara branch on March 30, 1998, maintaining the newly acquired branch located approximately 2270 feet away. The bank's business strategy is to open branches in the growth areas of Las Vegas that have high concentrations of businesses. The overall effect of this strategy takes First Security Bank into the growing middle- and upper-income areas of Las Vegas where business expansion is most apparent. Dun & Bradstreet small business data indicates that there are still concentrations of small businesses in low- and moderate-income areas of the city, and while the bank has engaged in lending activities in these areas, it has not established a branch presence to service those neighborhoods.

The bank is accommodative to businesses that are located an extended distance from a FSB branch. However, service is limited to a courier service to assist customers in deposit transactions. A courier will visit a business office on a schedule set by the customer to transport non-cash deposits to the bank's central processing center. There are no fees for this service, and the bank currently accommodates over 200 customers with this alternative deposit system.

Community Development Services

The bank is providing an adequate level community development services to CRA qualified organizations throughout the Las Vegas area. The bank's CRA Officer is involved in community organizations and participates on boards of directors and finance and planning committees, and provides technical financial assistance to community organizations. An analysis of the services provided shows that the bank is performing on a monthly basis approximately 23 hours of community development services to 10 organizations in the Las Vegas metropolitan area. The bank also provides payroll processing services to two community organizations and provides free checking accounts to non-profit agencies.

COMPLIANCE WITH FAIR LENDING LAWS AND REGULATIONS

No violations of the substantive provisions of anti-discrimination laws and regulations were identified at this examination. First Security Bank of Nevada has developed policies, procedures, and training programs to ensure effective implementation of non-discriminatory lending practices.