



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

**First National Bank of St. Louis
Charter Number: 12333**

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Clayton, MO 63105**

Office of the Comptroller of the Currency

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NOTE: This document is an evaluation of this 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. This evaluation is not, and should not 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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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The following table indicates the performance level of **First National Bank of St. Louis (FNB)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	First National Bank of St. Louis Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The bank's responsiveness to community credit needs is good. The distribution of home purchase loans and home refinance loans by borrower income and small loans to businesses by business revenue is good.
- A substantial majority of FNB's loans were originated within its assessment area.
- FNB originated a good level of community development loans which addressed identified community credit needs.
- The number and dollar volume of qualified community development investments is excellent.
- The bank's service delivery system is accessible to individuals and geographies of different income levels.
- FNB officers and employees provide an adequate number of community development services.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement, and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing, and one-to-four family dwellings other than manufactured housing.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by the Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an

employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings, and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

Description of Institution

FNB is a \$1.3 billion (total assets) community bank headquartered in Clayton, Missouri. It is a wholly owned subsidiary of Central Bancompany, a 13-bank holding company with total assets of \$6.9 billion and headquartered in Jefferson City, Missouri.

FNB is an interstate bank with 11 branch offices located in Missouri (10) and Illinois (1). The bank offers a full range of loan and deposit products in its assessment area (AA). As of March 31, 2006, net loans represented 81% of total assets with Tier One Capital of \$116 million. The loan portfolio includes real estate secured loans (82%), commercial loans (8%), consumer loans (4%), and other loans (6%).

FNB received a "Satisfactory" CRA rating at its last evaluation dated August 12, 2002.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Except for community development (CD) loans, the evaluation period for the Lending Test is January 2, 2002 through December 31, 2005. The evaluation period for CD loans, the Investment Test, and the Service Test is August 13, 2002 through June 30, 2006.

Major changes to MSA boundaries and US Census data occurred during this evaluation period. In 2003, the US Census Bureau revised the demographic data for all communities based on results from the 2000 Census. In 2004, the Office of Management and Budget revised MSA boundaries and census tracts in the AA. As a result, the data displayed on the tables in Appendix D are limited to 2004 and 2005 loans. However, the bank's lending performance in 2002 and 2003 is discussed in narrative format.

Data Integrity

This evaluation is based on accurately reported loan data. We reviewed the bank's home mortgage loans and small loans to businesses for accuracy and found it to be substantially accurate. We also reviewed FNB's CD loans, qualified investments, and CD services to determine if they met the regulatory definition of CD. The substantial majority of these loans, investments, and services did meet the definition of CD and we included these CD activities in our analysis.

Selection of Areas for Full-Scope Review

We performed a full-scope review on the combined AA.

Ratings

The bank's overall CRA rating is based on its performance in the combined AA. By rule, more weight is given to the bank's performance under the Lending Test when determining its overall CRA rating.

The Lending Test rating is based primarily on the bank's loan distribution by **borrower** income, business revenue, and its CD loans. The bank's overall loan volume and percentage of loans originated within the AA were also considered.

Based on AA demographics, we gave no weight to the geographic distribution of loans within the AA when determining FNB's performance under the Lending Test. Low-income geographies contain less than one percent of the AA's population, less than one percent of the AA's owner-occupied housing units, and less than one percent of the AA's small businesses. In addition, moderate-income geographies contain only 4.05% of the AA's population, 3% of the AA's owner-occupied housing units, and 5% of the AA's small businesses. These factors make it difficult to originate loans in low- and moderate-income areas or to perform a meaningful analysis on the geographic distribution of FNB's loans.

The number of multifamily loans and small loans to farms originated or purchased by FNB is not significant enough to perform a meaningful analysis. As a result, multifamily loans and small loans to farms were given no weight in determining FNB's Lending Test rating.

Other

During our review, we performed community contacts with a local community development agency and local government official. The contacts identified affordable housing for low- and moderate-income persons and small business loans as the AA's primary needs.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of illegal discrimination or other illegal credit practices.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated High Satisfactory. Based on full-scope reviews, the bank's performance in its combined AA is good.

Lending Activity

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's lending activity.

Lending activity for home purchase, home improvement, home refinance, and small business loans is adequate, given performance context. The bank's market share of home purchase loans is .78%, its market share for home improvement loans is .28%, its market share for home refinance loans is .50%, and its small business loan market share is 1.08%. The bank's lending activity is adequate given its deposit market share. FNB ranks 8th in terms of deposits among depository institutions in the St. Louis Missouri - Illinois multistate MSA with a 1.83% market share.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2, 3, 4, 5 and 6 in Appendix C for facts and data on the geographic distribution of the bank's home mortgage loan originations and purchases, and small loans to businesses.

Based on demographic information discussed under the "Ratings" section of this evaluation, we did not include the geographic distribution of these loans in the analysis of the bank's Lending Test rating.

Inside/Outside Ratio

During the evaluation period over 79% of FNB's loans were originated/purchased within the combined AA. We gave positive consideration to this record of lending within the AA when drawing conclusions on the overall distribution of lending and the Lending Test rating.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

The distribution of home purchase loans by borrower income is good. In 2004 and 2005, the portion of home purchase loans to low-income borrowers was lower than the portion of AA families who are low-income. However, the portion of home purchase loans to moderate-income borrowers was substantially greater than the portion of moderate-income families in the AA. The bank's market share for home purchase loans to low- and moderate-income borrowers was somewhat lower than its overall market share.

In 2002 and 2003, the bank's performance was similar to its performance in 2004 and 2005. The portion of home purchase loans to low-income borrowers was lower than the portion of low-income families, while loans to moderate-income borrowers exceeded the portion of moderate-income families in the AA.

Home Improvement Loans

As reported, the distribution of home improvement loans by borrower income is poor. In 2004 and 2005, the bank did not originate any home improvement loans to low-income families. The portion of home improvement loans to moderate-income borrowers was significantly below the portion of moderate-income families within the AA. The bank's market share of loans to moderate-income families was significantly lower than its overall market share.

However, performance context issues had a significant impact on the bank's ability to make home improvement loans. Most of FNB's borrowers prefer to use home equity loans to finance home improvement projects. Home equity loans offer borrowers certain flexible terms not offered in home improvement loans. Because lenders have the option of not reporting home equity loans, FNB does not track or report its home equity loans. As a result, we did not place much weight on the borrower distribution of FNB's home improvement loans.

FNB's performance in 2002 and 2003 was better than its 2004 and 2005 performance. During 2002 and 2003, the portion of loans to low-income borrowers was lower than the portion of AA families who are low-income. This performance compares favorably to its performance in 2004 and 2005 as FNB did not originate/purchase any home improvement loans to low-income borrowers during those years. In 2003, the portion of loans to moderate-income borrowers exceeded the portion of moderate-income families in the AA. In 2002, the portion of loans to moderate-income borrowers was slightly below the portion of the AA's moderate-income families.

Home Mortgage Refinance Loans

The distribution of home mortgage refinance loans by borrower distribution is good. In 2004 and 2005, the portion of loans to low-income borrowers was lower than the portion of low-income families in the AA. However, the portion of loans to moderate-income borrowers was equal to the portion of moderate-income families in the AA. The bank's market share of loans to low- and moderate-income borrowers was lower than its overall market share.

The bank's 2002 and 2003 performance was similar to 2004 and 2005. In 2002 and 2003, the portion of loans to low-income borrowers was lower than the portion of low-income families in the AA. In 2003, the portion of loans to moderate-income borrowers was greater than the

portion of the AA's moderate-income families; in 2002, it was slightly lower than the portion of moderate-income families. The bank's market share for low- and moderate-income borrowers was lower than its overall market share.

Small Loans to Businesses

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is good. In 2004 and 2005, the portion of loans to businesses with revenues of \$1 million or less was somewhat lower than the portion of AA businesses with revenues of \$1 million or less. However, the bank's market share of loans to business with revenues of \$1 million or less exceeds the bank's overall market share. In 2003, the portion of loans to businesses with revenues of \$1 million or less was slightly less than the portion of AA businesses with revenues of \$1 million or less. FNB's performance in 2002 was similar to its 2003 performance.

Community Development Lending

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. However, Table 5 does not separately list CD loans.

FNB did a good job of originating CD loans during this evaluation period. The bank originated 4 loans totaling \$984,000. These loans provided temporary financing to an organization for the construction of multifamily housing for low- and moderate-income residents living in the AA. FNB's CD lending had a positive impact on its performance under the Lending Test.

Product Innovation and Flexibility

FNB participates in several national, state-wide, and locally offered flexible home mortgage loan programs. These programs are offered by government agencies and government-sponsored agencies and utilize flexible underwriting terms to provide increased access to home mortgage loans. Particularly noteworthy is the HOPE VI program, which combines a FNB home mortgage loan with a flexible second mortgage from the St. Louis Housing Authority to allow families that were previously Section 8 renters to purchase a home.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated Outstanding. Based on full-scope reviews, the bank's performance in the combined AA is excellent. The vast majority of FNB's CD investment activity was targeted at addressing the need for affordable low- and moderate-income (LMI) rental housing and home purchase loans for LMI borrowers. Both were identified

as critical CD needs in the AA. The responsiveness and dollar volume of FNB's CD investments was a major factor in FNB achieving an Outstanding rating under the Investment Test.

Refer to Table 14 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Current Period Investments: The number and dollar volume of FNB's CD investments reflects excellent responsiveness to the AA's CD investment needs. The bank originated 43 CD investments totaling \$2.8 million during the evaluation period. By dollar, the substantial portion of the bank's investments is in mortgage-backed securities, which consists of pools of mortgage loans to LMI borrowers within the AA. These securities are important as they provide liquidity to mortgage loan originators, allowing them to meet additional AA credit needs. The other significant dollar investment is in limited partnerships organized by a local not-for-profit developer of affordable rental housing for LMI residents.

Prior Period Investments: The bank has 5 prior period CD investments totaling \$576,000. These consist of investments in low-income residential housing developments.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the combined AA is adequate.

Retail Banking Services

Refer to Table 15 in appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

FNB's retail delivery systems are reasonably accessible to geographies and individuals of different income levels. The bank does not have any branches in low- or moderate-income geographies. However, less than 5% of the AA's population resides in these geographies.

The branch opening activity increased access for residents in middle-income geographies. FNB opened 2 branch offices in middle-income geographies during this evaluation period. There were no branch closings in the AA.

FNB's hours and services offered throughout the AA are adequate. Office hours and services do not vary significantly from one branch to another. The bank's automatic teller machines (ATMs) provide an alternative delivery system for AA residents. Because the bank does not compile data on ATM usage, we could not evaluate its impact in providing access to FNB's products and services.

Community Development Services

Based on the number of organizations impacted, the bank provides an adequate level of CD services in the AA. Twelve organizations have benefited from the efforts of FNB management and staff members to deliver CD services to the AA. These organizations help to meet the AA's LMI housing, economic development, and neighborhood revitalization needs. Some FNB officers and employees regularly share their financial expertise and provide technical assistance by serving as Board members, officers, or finance committee members for CD organizations. These organizations help to provide LMI housing assistance, economic development opportunities, and other CD services to AA residents. In addition, FNB officers and employees actively support CD organizations that provide job training, health care, and small business assistance to LMI residents and geographies.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received a comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): January 2, 2002 to December 31, 2005 Investment and Service Tests and CD Loans: August 13, 2002 to June 30, 2006	
Financial Institution	Products Reviewed	
First National Bank of St. Louis (FNB), Clayton, Missouri	Home Mortgage, Small Business, and Community Development Loans; Qualified Community Development Investments and Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Combined St. Louis AA	Full-Scope	

Appendix B: Market Profiles for Full-Scope Areas

FNB St Louis 2006 CRA Assessment Area

Demographic Information for Full-Scope Area: FNB St Louis 2006 Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	198	0.51	5.56	42.42	51.01	0.51
Population by Geography	1,083,135	0.17	4.34	42.01	53.47	0.00
Owner-Occupied Housing by Geography	321,812	0.15	3.62	41.00	55.23	0.00
Businesses by Geography	68,469	0.09	5.98	37.85	56.08	0.00
Farms by Geography	1,775	0.11	2.76	53.92	43.21	0.00
Family Distribution by Income Level	293,181	10.85	14.50	21.74	52.92	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	74,317	0.47	8.47	56.91	34.14	0.00
Median Family Income = \$53,435 HUD Adjusted Median Family Income for 2006 = \$63,800 Households Below the Poverty Level = 5%			Median Housing Value = \$148,057 Unemployment Rate = 2.02%			

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 U.S. Census, and 2006 HUD updated MFI.

The bank's two AAs are within the St. Louis Missouri/Illinois Multi-State MSA. FNB's AA includes 110 contiguous census tracts (CTs) in St. Louis County, Missouri, 61 CTs in St. Charles County, Missouri, and 27 CTs in St. Clair County, Illinois. Of these CTs, one CT is designated as low-income, 12 are designated as moderate-income, and the rest are designated as middle- or upper-income. The Missouri and Illinois AA's were combined for analysis purposes.

Overall, the St. Louis MSA's economy is stable. The area's job market is supported by aircraft manufacturing, medical services, transportation, and the automobile manufacturing industry.

The portion of the MSA which contains the bank's AA is particularly affluent and consists of mostly middle-and upper-income residents. The bank is headquartered within the downtown business district of Clayton, Missouri. Clayton is the county seat of St. Louis County and serves as an economic hub for the western portion of the MSA. According to the Clayton City Manager's Office, the city's estimated average family household income is \$180,887, per capita income is \$56,719, the average appraised value for single-family residences is \$438,230, and white-collar workers comprise 91% of the city's workforce.

Some of the MSA's largest corporations are headquartered in Clayton, including Enterprise Rent-A-Car, Brown Shoe, Centene Corp, and Graybar Electric.

Banking competition is very strong for loans, deposits, CD loans, and investments. The strong competition limits the number of opportunities FNB has to make CD loans and investments.

Some of FNB's major competitors with a significant retail branch network in the AA include US Bank, Bank of America, National City Bank, Commerce Bank, UMB Bank, and First Bank. In addition, FNB competes with numerous smaller deposit-taking financial institutions and other financial service providers for loan and investment opportunities in the AA.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column with the appropriate caption, such as: “Statewide/Regional,” “Statewide/Regional with potential benefit to one or more AAs” or “Out of Assessment Area.” “Out of Assessment Area” is used ONLY if the bank has otherwise adequately met the CD lending needs of its assessment area.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

Table 12. Borrower Distribution of Small Loans to Farms - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of the Assessment Area" is used ONLY if the bank has otherwise adequately met the qualified investment needs of its assessment area.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: Combined FNB						Evaluation Period: January 2, 2004 to December 31, 2005				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
FNB St Louis 2004-2005 AA	100.00	1,136	235,156	897	200,138	0	0	4	984	2,037	436,278	100.00

* Loan Data as of December 31, 2005. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is August 13, 2002 to June 30, 2006.

*** Deposit Data as of June 30, 2005. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: Combined FNB				Evaluation Period: January 2, 2004 to December 31, 2005					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
FNB St Louis 2004-2005 AA	595	100.00	0.15	0.00	3.62	2.02	41.00	37.98	55.23	60.00	0.76	0.00	0.32	0.66	0.88

* Based on 2004 Peer Mortgage Data: Western Region.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: Combined FNB						Evaluation Period: January 2, 2004 to December 31, 2005							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
FNB St Louis 2004-2005 AA	14	100.00	0.15	0.00	3.62	0.00	41.00	21.43	55.23	78.57	0.28	0.00	0.00	0.07	0.52

* Based on 2004 Peer Mortgage Data: Western Region.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: Combined FNB				Evaluation Period: January 2, 2004 to December 31, 2005					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ... Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
FNB St Louis 2004-2005 AA	523	100.00	0.15	0.19	3.62	1.15	41.00	25.81	55.23	72.85	0.50	0.00	0.23	0.33	0.63	

* Based on 2004 Peer Mortgage Data: Western Region.

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: Combined FNB						Evaluation Period: January 2, 2004 to December 31, 2005							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
FNB St Louis 2004-2005 AA	4	100.00	0.02	0.00	5.42	0.00	53.38	75.00	41.19	25.00	1.15	0.00	0.00	0.98	1.96

* Based on 2004 Peer Mortgage Data: Western Region.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Combined FNB						Evaluation Period: January 2, 2004 to December 31, 2005							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography					
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid
Full Review:																
FNB St Louis 2004-2005 AA	897	100.00	0.09	0.00	5.98	1.56	37.85	22.30	56.08	76.14	1.08	0.53	0.39	0.74	1.56	

* Based on 2004 Peer Small Business Data: US.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet 2005.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Combined FNB				Evaluation Period: January 2, 2004 to December 31, 2005					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
FNB St Louis 2004-2005 AA	0	0.00	0.11	0.00	2.76	0.00	53.92	0.00	43.21	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2004 Peer Small Business Data: US.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet 2005.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: Combined FNB						Evaluation Period: January 2, 2004 to December 31, 2005							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
FNB St Louis 2004-2005 AA	595	100.00	10.85	5.46	14.50	17.08	21.74	23.59	52.92	53.87	0.88	0.69	0.61	0.90	1.05

* Based on 2004 Peer Mortgage Data: Western Region.

** As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by Bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: Combined FNB				Evaluation Period: January 2, 2004 to December 31, 2005					Market Share				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****						
Full Review:																
FNB St Louis 2004-2005 AA	14	100.00	10.85	0.00	14.50	7.14	21.74	14.29	52.92	78.57	0.32	0.00	0.17	0.25	0.51	

* Based on 2004 Peer Mortgage Data: Western Region.

** As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by Bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: Combined FNB				Evaluation Period: January 2, 2004 to December 31, 2005					Market Share				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families**	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
FNB St Louis 2004-2005 AA	523	100.00	10.85	5.28	14.50	14.29	21.74	25.83	52.92	54.60	0.64	0.42	0.45	0.59	0.79	

* Based on 2004 Peer Mortgage Data: Western Region.

** As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by Bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Combined FNB			Evaluation Period: January 2, 2004 to December 31, 2005				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
FNB St Louis 2004-2005 AA	897	100.00	62.95	52.84	45.48	25.53	28.99	1.08	1.15

* Based on 2004 Peer Small Business Data: US.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2005).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Combined FNB			Evaluation Period: January 2, 2004 to December 31, 2005				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [*]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
FNB St Louis 2004-2005 AA	0	0.00	89.18	0.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2004 Peer Small Business Data: US.

^{**} Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

^{***} Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2005).

^{****} Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Combined FNB				Evaluation Period: August 13, 2002 to June 30, 2006			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
FNB St Louis 2006 CRA Assessment Area	5	576	43	2,839	51	3,415	100.00	0	0

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS		Geography: Combined FNB						Evaluation Period: January 2, 2004 to December 31, 2005									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
FNB St Louis 2006 CRA Assessment Area	100.00	11	100.00	0	0	18.18	81.82	2	0	0	0	2	0	0.17	4.34	42.01	53.47