



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

7707 Forsyth Boulevard
Clayton, MO 63105

Office of the Comptroller of the Currency

2350 Market Street, Room 100
St. Louis, MO 63103

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 the **First National Bank of St. Louis** 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			
Low Satisfactory	X		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:

- First National Bank of St. Louis’ (FNB) Lending Test performance is adequate. FNB achieved an adequate level of lending volume throughout the evaluation period. While FNB’s borrower income distribution reflected adequate distribution for home mortgage loans and good distribution for small loans to businesses, FNB’s geographic distribution reflects poor dispersion of their loans in low- and moderate-income census tracts for home mortgage loans and adequate distribution for small loans to businesses. We noted substantial gaps in their lending performance in these areas. The overall adequate conclusion reflects a positive impact to the Lending Test based on the Community Development lending and product innovation and flexibility of their loan products.
- FNB’s Investment Test performance demonstrates excellent responsiveness in addressing the assessment area’s needs through investments targeted at affordable housing projects for low- and moderate-income residents.
- The bank’s performance under the Service Test is adequate. The accessibility of FNB’s retail delivery system to individuals and geographies of different income levels is limited, while its community development services are excellent.

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.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development.

Activities that revitalize or stabilize-

- (i) Low- or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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% 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% of the area median income, or a median family income that is less than 50%, 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 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% and less than 120% of the area median income, or a median family income that is at least 80% and less than 120%, in the case of a geography.

Moderate-Income: Individual income that is at least 50% and less than 80% of the area median income, or a median family income that is at least 50% and less than 80%, 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 at least 120% of the area median income, or a median family income that is at least 120%, in the case of a geography.

Description of Institution

First National Bank of St. Louis (FNB) is a full-service interstate bank headquartered in Clayton, Missouri. FNB is a subsidiary of Central Banccompany, Inc., a \$10 billion bank holding company headquartered in Jefferson City, Missouri. As of December 31, 2012, FNB had assets of \$1.45 billion, net loans of \$1.04 billion, and Tier One Capital of \$137 million.

In 2012, FNB opened a full-service branch located at 10704 West Florissant Avenue, Ferguson, Missouri. There were no acquisitions, mergers or branch closings during the evaluation period.

FNB's operations are primarily centered in the St. Louis MO-IL MSA. The bank's business focus is largely on commercial and real estate lending within its local market area. The bank has 3 branches in Illinois, 12 branches in Missouri, and 3 ATMs in Missouri.

The bank offers a full range of banking products and services to individuals and small businesses. The composition of the loan portfolio includes: real estate loans at 80%, commercial loans at 18%, and individual loans at 2%.

FNB received a "Needs to Improve" rating at the last CRA examination dated October 26, 2009. There are no legal, financial, or other factors that would impede the bank's ability to help meet the credit needs of its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation assesses information since the previous CRA examination. The evaluation period for our review of the bank's community development loans, investments and services, as well as retail banking services covers the period from July 1, 2010 through December 31, 2012. The evaluation period for our review of the bank's HMDA and small business loan originations includes loans originated and purchased from January 1, 2010 through December 31, 2012. The loans originated and purchased in 2010 and 2011 were evaluated using 2000 census data. The loans originated and purchased in 2012 were evaluated using 2010 census data. Greater weight was given to the loans from 2010 and 2011 due to the volume of lending during that timeframe. Sixty-four percent of the mortgage and small loans to business lending in the evaluation period was done during that two-year period.

Data Integrity

Prior to this CRA examination, we verified the accuracy of data made available to the public in accordance with the HMDA and CRA regulations. Public data included home mortgage lending and small loans to farms and businesses. Based on our verification work, we determined the HMDA and CRA data to be reliable for analysis. In addition, we reviewed certain non-public data submitted by bank management for community development loans, investments, and services to ensure they met the regulatory definition of community development and used only those loans, investments and services that met that definition.

Selection of Areas for Full-Scope Review

FNB has only one assessment area (AA). We reviewed that AA to ensure it met the regulatory requirements. The AA meets the definition of the regulation and does not arbitrarily exclude low- and moderate-income census tracts (CTs). The bank's AA is a portion of the St. Louis MO-IL #41180 MSA. The St. Louis MO-IL MSA consists of eight counties in Missouri and eight counties in Illinois. The bank has five of those counties in its AA – St. Charles and St. Louis counties and the City of St. Louis in Missouri, and Monroe and St. Clair counties in Illinois. This AA was selected for a full-scope review. Refer to Appendix B for more detailed AA information.

Ratings

The bank's overall rating is based entirely on the bank's performance in the full-scope AA (St. Louis MO-IL MSA). Performance under the Lending Test receives greater weight than performance under the Investment Test or Service Test when assigning an overall CRA rating. Under the Lending Test, HMDA loan originations and small business loan originations accounted for a significantly higher volume by both number and dollar. HMDA lending received the most weight, followed by small loans to businesses. Small farm, home improvement and multifamily loans were not analyzed based on the small volume of originations. None of these loan types was an identified primary credit need within the AA.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

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 Low Satisfactory. Based on a full-scope review, the bank's performance in the St. Louis MO-IL MSA is adequate.

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 levels reflect adequate responsiveness based on AA credit needs and the bank's deposit market share. According to the FDIC's deposit market share data as of June 30, 2012, the bank has a deposit market share of 1.48%, which ranks 14th in the AA of 88 institutions.

During the period from January 1, 2010 through December 31, 2011, FNB made 3,451 home mortgage, small loans to businesses and small loans to farms in the St. Louis, MO-IL MSA, totaling \$708 million. Approximately 77% of loans originated or purchased in this AA are home mortgage loans, 23% are small loans to businesses, and less than 0.1% are small loans to farms. Of the total home mortgage loans, 70% are home refinance loans, 28% are home purchase loans, 1.5% are home improvement loans, and 0.5% are multifamily loans.

During the period from January 1, 2012 to December 31, 2012, FNB made 1,914 loans in the AA totaling \$394 million. Approximately 80% of loans originated or purchased in this AA are home mortgage loans, 20% are small loans to businesses, and less than 0.2% are small loans to farms. Of the total home mortgage loans, 80% are home refinance loans, 20% are home purchase loans, and less than 1% are home improvement and multifamily loans.

Based on 2011 peer mortgage data, FNB ranked 18th of 397 lenders reporting home loan purchases with 1.16% of the market share. FNB ranked 23rd of 494 lenders in home refinance loans with 0.98% of market share. FNB ranked 16th in small loans to businesses of 117 lenders reporting business loans with 1.25% of the market share.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

The overall geographic distribution of home mortgage loans in the AA is poor.

Home purchase loan geographic distribution is poor. The percentage of home purchase loans made in the low-income geographies in 2010 and 2011 is significantly less than the percentage of owner-

occupied housing units in low-income geographies in the AA. The bank's portion of these loans in moderate-income geographies was less than the percentage of owner-occupied housing units. The percentage of home purchase loans made in the low-income geographies in 2012 is significantly less than the percentage of owner-occupied housing units in low-income geographies. The bank's portion of these loans in moderate-income geographies is less than the percentage of owner-occupied housing units in these geographies in 2012.

Home refinance loan geographic distribution is very poor. The percentage of home refinance loans made in the low- and moderate-income geographies in 2010 and 2011 is significantly less than the percentage of owner-occupied housing units in low-income geographies. The percentage of home refinance loans made in low- and moderate-income geographies in 2012 is also significantly less than the percentage of owner-occupied housing units.

Small Loans to Businesses

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The bank's geographic distribution of small loans to businesses in the St. Louis MO-IL MSA is adequate.

FNB's 2010 and 2011 performance in low- and moderate-income geographies is poor. FNB's small loans to business lending is lower than the number of businesses located in those CTs. In 2012, FNB's performance in low-income CTs is good as it is near to the number of businesses located in low-income CTs. Performance in moderate-income CTs is adequate as it is somewhat lower than the demographics in the AA.

Lending Gap Analysis

We identified significant conspicuous geographic gaps in FNB's lending distribution. The bank did not originate any HMDA-reportable loans in 116 or 25.8% of the CTs in its AA. Seventy-four percent of those CTs are designated as low- or moderate-income. The bank did not originate any small loans to businesses in 299 or 66% of the CTs in its AA. Forty-three percent of those CTs are designated as low- or moderate-income. The bank's poor loan penetration in these CTs had a negative impact on its overall Lending Test performance.

Inside/Outside Ratio

A majority of loans originated or purchased by FNB over the evaluation period are within its AA. Approximately 83% of the bank's home mortgage and 84% of small business loans are within its AA. This performance was factored into the overall analysis of the geographic distribution of lending by income level of geographies.

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.

The borrower distribution of home mortgage loans is adequate. In evaluating the borrower distribution of home mortgage loans we considered the large number of families that live below the poverty level (10%-12%) and the barriers this may have on home ownership.

The borrower distribution of FNB's home purchase loans is good for loans originated and purchased in 2010 and 2011. FNB's lending to low-income borrowers is adequate as it is somewhat lower than the AA demographics for low-income families. Lending to moderate-income borrowers is excellent as FNB exceeded the demographics for moderate-income families in the AA. For 2012, lending to low-income borrowers is good while lending to moderate-income borrowers is excellent.

The borrower distribution of FNB's home mortgage refinance loans is adequate for refinance loans originated and purchased in 2010 and 2011. The distribution in relation to low-income borrowers is poor as the bank's lending to those borrowers was less than the percentage of low-income families in the AA. The distribution in relation to moderate-income borrowers is adequate. The percentage of home refinance loans made to moderate-income borrowers is below the percentage of moderate-income families in the AA. For 2012 loans, lending to low-income borrowers is very poor as the bank's lending is significantly below the AA demographics. Lending to moderate-income borrowers is adequate as the bank's lending is somewhat lower than the AA demographics.

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 reflects good penetration among businesses of different sizes.

The borrower distribution of FNB's small loans to businesses is good. FNB's 2010 and 2011 performance in low- and moderate-income geographies was near to the percentage of small businesses (those with revenues of \$1 million or less) and considered good. In 2012, FNB's performance was also near to the percentage of small businesses in the AA and considered good.

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 community development (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 multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

CD lending had a positive effect on the Lending Test conclusions. The volume of CD lending is relatively high and is responsive to the need for affordable housing in the AA.

During this examination's evaluation period, FNB originated eight CD loans and renewed eight CD loans totaling more than \$22 million that directly benefited the AA. The majority of the loans were to developers and organizations providing affordable housing for low- and moderate-income families through housing developments. Two loans were to developers of a strip mall and convenience store providing services to and employment of low- and moderate-income individuals. One loan was to revitalize property in a blighted area, and another was for a nursing home facility with over 50% low- and moderate-income patients.

Product Innovation and Flexibility

Product innovation has a positive effect on the Lending Test.

FNB has two innovative loan products to meet the credit needs of low- and moderate-income individuals and small businesses. The first product is a Special Financing Program, which is required as part of the Department of Housing and Urban Development's Conciliation Agreement between the Metropolitan St. Louis Equal Housing Opportunity Council and FNB. Per the Agreement, this loan product is available to residents/potential residents of a certain portion of the bank's AA as outlined in the Agreement, which FNB added to its AA in 2010, making the borrowers eligible to receive up to \$2,500 in down payment/closing cost assistance. Low- and moderate-income residents in other parts of the bank's AA are able to receive up to \$1,500 in down payment/closing cost assistance. As of December 31, 2012, FNB has assisted 89 low- and moderate-income families through this program.

A second innovative loan product offered by FNB is the Express Loan Program. FNB became a delegated lender for the Express Loan Program as part of the 7(a) Small Business Administration loan program. They made one loan under this program during the evaluation period.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

The bank's performance under the Investment Test is rated Outstanding. Based on a full-scope review of FNB's AA, they demonstrated excellent responsiveness in addressing the AA's needs through investments targeted at affordable housing projects for low- and moderate-income residents. In addition, they invested funds in revitalizing low- and moderate-income geographies through remodeling and expansion of school facilities.

FNB made a total of 66 investments during the evaluation period totaling nearly \$16 million. The investments consist mainly of investments and donations which are generally routine and non-complex, but responsive to identified needs for affordable housing and revitalization of low- and moderate-income geographies, which are identified needs in the AA. They also provided donations for various community development service organizations that provide services targeted to the low- and moderate-income residents of the AA.

Current period investments consist of:

- Three investments for affordable housing projects totaling \$11 million, which included construction of a new 48-unit building targeted to veterans with limited income and construction of a new 34-unit building which represented low-income housing tax credits with Section 8 assistance. Another investment helped to fund a 203-unit building in St. Anne, Missouri, that also provides affordable housing to low-income residents.
- Investments totaling nearly \$2 million to revitalize low- and moderate-income CTs by improving school building facilities through expansion and remodeling.
- Multiple donations to various organizations which promote affordable housing in FNB's AA, in addition to donations to various community development service organizations.

Prior period investments consisted of six investments totaling \$1.4 million which included \$1 million to revitalize an area school district through expansion of its building facilities and mortgage-backed securities with outstanding balances of \$400,000.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the St. Louis MSA is adequate. The accessibility of FNB's retail delivery system to individuals and geographies of different income levels is limited, but community development services provided by bank employees is excellent.

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 improved the accessibility of its retail delivery during the assessment period through one branch opening and also through changes to the census tract data due to the 2010 census; however, accessibility to low- and moderate-income individuals remains limited. The bank's 12 Missouri branch offices are located primarily on the western side of St. Louis and St. Charles counties. These geographies consist mostly of middle- and upper-income CTs. The bank also lists 3 stand-alone ATM locations in St. Charles, MO, with each ATM located in an upper-income CT. In Illinois, FNB St. Louis has two branch offices in middle-income geographies and one branch office in an upper-income geography.

FNB opened one branch office in a moderate-income census tract located on the north side of St. Louis County. North St. Louis County is primarily low- and moderate income. This branch opened in March 2012 in accordance with a requirement in the Department of Housing and Urban Development's Conciliation Agreement between the Metropolitan St. Louis Equal Housing Opportunity Council and FNB.

Using 2010 census data, one branch changed from an upper-income CT to a moderate-income CT. This change gives FNB its second branch in a moderate-income CT. While the distribution of branch locations among income geographies improved, the bank has only one branch location in North St. Louis County and no branch locations in the City of St. Louis. These two broader areas include the majority of low- and moderate-income CTs in the AA. The locations of FNB's branches continue to limit the accessibility of bank services to a large portion of low- and moderate-income CTs.

FNB's branch hours, products, and services do not vary significantly by branch location. Branches are typically open for business Monday through Thursday at 8:30 or 9:00 a.m. and are closed at 5:00 p.m., with extended hours offered on Friday. With the exception of one, all branches are open for three hours on Saturdays. The bank offers a free checking product to all of its customers, which is a benefit to the low- and moderate-income individuals within their AA. They also offer an Easy Checking product targeted to low- and moderate-income individuals; however, that product is limited to 41 specific zip codes when opening the account online.

FNB relies on three alternative methods (online banking, mobile banking, and ATMs) to supplement its branch network and reach customers without access to a branch location. The effectiveness of these alternative delivery methods is limited. The MoneyPass ATM network that the bank participates in increases accessibility to surcharge-free ATM withdrawals at over 250 ATMs within the AA and over 20,000 ATMs nation-wide. While this network increases the accessibility of withdrawals from FNB accounts, deposits cannot be made without going to an FNB branch location. The mobile banking service is the only alternative service method offered by the bank that allows for customers to make deposits to their accounts, but the technology required for that service may have a negative effect on its accessibility to low- and moderate-income individuals.

Community Development Services

FNB's performance in providing CD services in the AA is outstanding. The bank's officers and employees provided over 1,750 qualified CD service hours between 2010-2012 by providing financial expertise to over 40 different organizations that focus on small business development and the social service needs of low- and moderate-income individuals and families.

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 nonmetropolitan areas that received 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): 01/01/2010 to 12/31/2012 Investment and Service Tests and CD Loans: 07/01/2010 to 12/31/2012	
Financial Institution	Products Reviewed	
First National Bank of St. Louis (FNB), Clayton, Missouri	Home mortgage loans, Small business loans, Community Development loans, 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
Part of the St. Louis MO-IL MSA #41180 (Including the full counties of St. Charles and St. Louis in MO, plus the City of St. Louis, MO, and the counties of Monroe and St. Clair in IL)	Full Scope	

Appendix B: Market Profiles for Full-Scope Areas

Demographic Information for Full-Scope Area – 2000 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	401	13.22	23.44	35.91	26.43	1.00
Population by Geography	1,932,088	7.53	20.36	40.33	31.77	0.01
Owner-Occupied Housing by Geography	525,154	4.05	17.03	43.12	35.80	0.00
Businesses by Geography	186,130	4.92	15.51	38.36	40.85	0.36
Farms by Geography	4,092	1.32	9.41	53.91	35.34	0.02
Family Distribution by Income Level	503,125	19.30	17.30	21.50	41.90	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	184,145	14.14	31.56	39.57	14.73	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below the Poverty Level	= \$53,435 = \$69,500 = 10%				Median Housing Value = \$112,644 Unemployment Rate = 2.95%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Demographic Information for Full-Scope Area – 2010 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	450	16.00	18.89	30.89	33.78	0.44
Population by Geography	1,981,746	10.39	17.94	32.71	38.90	0.06
Owner-Occupied Housing by Geography	546,994	6.01	15.76	34.85	43.38	0.00
Businesses by Geography	181,645	6.99	15.41	30.96	46.54	0.10
Farms by Geography	4,185	2.49	11.40	38.81	47.24	0.07
Family Distribution by Income Level	506,229	20.89	16.40	20.03	42.68	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	188,769	19.35	27.29	32.06	21.30	0.01
Median Family Income FFIEC Adjusted Median Family Income for 2012 Households Below the Poverty Level	= \$67,013 = \$70,400 = 12%				Median Housing Value = \$183,160 Unemployment Rate = 4.15%	

FNB's AA did not change during the evaluation period; however, the census information changed the demographics of the AA. Low-income CTs increased from 13.22% to 16% of the AA but moderate-income CTs decreased from 23.44% to 18.89%.

The area economy is starting to improve. According to the U.S. Department of Labor Bureau of Labor Statistics, the December 31, 2009 unemployment rate for the MSA was 9.9%. As of December 31, 2012 the unemployment rate for the MSA had improved to 7.6%. This compares to the State of Missouri unemployment rate as of December 31, 2012 of 6.7% and the State of Illinois rate of 8.7%. The community contact we talked to indicated that there are multiple geographies in the St. Louis area that are still struggling and in need of revitalization, particularly St. Louis City and North St. Louis county. While community development focused organizations are continuing efforts in these areas, federal funding has been cut. Seriously depressed areas have had appraised property values decrease to levels where funding to renovate properties is difficult because collateral does not cover the necessary loan amounts. Financial services in depressed areas are still limited. While local financial institutions and community development organizations have recently focused on increasing financial education, many individuals in these low-income geographies are still turning to payday lenders and other non-financial institution lenders for their credit needs.

Banking competition is strong with 88 FDIC-insured institutions with 654 branch offices operating in the AA. Deposits are somewhat concentrated with four institutions holding more than 56% of the AA deposits in 189 branches.

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. [Note: Do not renumber the tables.]

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. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- 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. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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.

Institution ID: FNB STL (Included)

Table 1. Lending Volume

LENDING VOLUME		Geography: FNB STL MO-IL AA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2012				
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 STL AA 2010-2011	100.00	2,641	508,535	807	198,811	3	739	11	12,165	3,462	720,250	100.00
FNB STL AA 2012	100.00	1,522	294,574	389	99,601	3	254	5	10,020	1,919	404,449	100.00

* Loan Data as of December 31, 2012. Rated area refers to either state or multi-state MA rating area.
 ** The evaluation period for Community Development Loans is from July 1, 2010 to December 31, 2012.
 *** Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: FNB STL (Included)

Table 1. Other Products

LENDING VOLUME		Geography: FNB STL MO-IL AA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2012						
Assessment Area:	% of Rated Area Loans (#) in MA/AA	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:														
FNB STL AA 2010-2011	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00
FNB STL AA 2012	0	0	0	0	0	0	0	0	0	0	0	0	0	0

* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Optional Product Line(s) is from January 01, 2010 to December 31, 2011.

*** Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: FNB STL (Included)

Table 1. Other Products

LENDING VOLUME		Geography: FNB STL MO-IL AA		Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2012	
Assessment Area:	Other Unsecured Consumer Loans		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
FNB STL AA 2010-2011	0	0	0	0	0
FNB STL AA 2012	0	0	0	0	0

* The evaluation period for Optional Product Line(s) is from January 01, 2010 to December 31, 2012.

Institution ID: FNB STL (Included)

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE 2012		Geography: FNB STL MO-IL AA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31,							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
FNB STL AA 2010-2011	735	100.00	4.05	0.95	17.03	8.71	43.12	37.14	35.80	53.20	1.21	0.50	1.23	0.96	1.49
FNB STL AA 2012	469	100.00	6.01	1.92	15.76	10.87	34.85	32.20	43.38	55.01					

* Based on 2011 Peer Mortgage Data (USPR)

** 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 units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information through 2011 and on 2010 Census Information for 2012.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: FNB STL (Included)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT 31, 2012			Geography: FNB STL MO-IL AA				Evaluation Period: JANUARY 1, 2010 TO DECEMBER					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	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 STL AA 2010-2011	43	100.00	4.05	0.00	17.03	11.63	43.12	25.58	35.80	62.79	0.77	0.00	0.45	0.41	1.32	
FNB STL AA 2012	6	100.00	6.01	16.67	15.76	16.67	34.85	0.00	43.38	66.67						

* Based on 2011 Peer Mortgage Data (USPR)

** 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 units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information through 2011 and 2010 Census information for 2012.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: FNB STL (Included)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2012			Geography: FNB STL MO-IL AA						Evaluation Period: JANUARY 1, 2010 TO						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
FNB STL AA 2010-2011	1,845	100.00	4.05	0.43	17.03	4.12	43.12	30.57	35.80	64.88	1.12	0.44	0.68	0.87	1.35
FNB STL AA 2012	1,044	100.00	6.01	0.96	15.76	4.60	34.85	22.51	43.38	71.93					

* Based on 2011 Peer Mortgage Data (USPR)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information through 2011 and based on 2010 Census information for 2012.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: FNB STL (Included)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY 2012		Geography: FNB STL MO-IL AA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31,							
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	Overa ll	Low	Mod	Mid	Upp
Full Review:															
FNB STL AA 2010-2011	18	100.00	11.64	0.00	19.46	5.56	46.35	94.44	22.55	0.00	5.14	0.00	0.00	12.09	0.00
FNB STL AA 2012	3	100.00	14.19	0.00	18.67	66.67	36.25	33.33	30.90	0.00					

* Based on 2011 Peer Mortgage Data (USPR)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information through 2011 and on 2010 Census information for 2012.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Institution ID: FNB STL (Included)

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2012		Geography: FNB STL MO-IL AA								Evaluation Period: JANUARY 1, 2010 TO					
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 Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
FNB STL AA 2010-2011	802	100.00	4.92	1.50	15.51	4.61	38.36	36.53	40.85	57.36	1.25	0.55	0.55	1.17	1.61
FNB STL AA 2012	388	100.00	6.99	6.44	15.41	11.86	30.96	22.16	46.54	59.54					

* Based on 2011 and 2012 Peer Small Business Data -- US and PR

** 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 (2011 and 2012).

Institution ID: FNB STL (Included)

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS 31, 2012		Geography: FNB STL MO-IL AA								Evaluation Period: JANUARY 1, 2010 TO DECEMBER					
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
FNB STL AA 2010-2011	3	100.00	1.32	0.00	9.41	0.00	53.91	66.67	35.34	33.33	0.00	0.00	0.00	0.00	0.00
FNB STL AA 2012	3	100.00	2.49	0.00	11.40	0.00	38.81	0.00	47.24	100.00					

* Based on 2011 and 2012 Peer Small Business Data -- US and PR

** 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 (2011 and 2012).

Institution ID: FNB STL (Included)

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 2012		Geography: FNB STL MO-IL AA								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31,					
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 ¹	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
FNB STL AA 2010-2011	735	100.00	19.30	9.64	17.30	23.74	21.50	21.87	41.90	44.75	1.44	0.84	1.38	1.48	1.68
FNB STL AA 2012	469	100.00	20.89	15.04	16.40	22.79	20.03	17.48	42.68	44.69					

* Based on 2011 Peer Mortgage Data (USPR)

** 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 Families is based on the 2000 Census information through 2011 and 2010 Census information for 2012

**** As a percentage of loans with borrower income information available. No information was available for 5.4% of loans originated and purchased by bank through 2011 and 3.6% for 2012.

¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: FNB STL (Included)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 2012		Geography: FNB STL MO-IL AA								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31,					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families ²	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
FNB STL AA 2010-2011	43	100.00	19.30	0.00	17.30	9.76	21.50	21.95	41.90	68.29	0.78	0.00	1.04	1.11	0.70
FNB STL AA 2012	6	100.00	20.89	0.00	16.40	50.00	20.03	33.33	42.68	16.67					

* Based on 2011 Peer Mortgage Data (USPR)

** 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 Families is based on the 2000 Census information through 2011 and 2010 Census information for 2012.

**** As a percentage of loans with borrower income information available. No information was available for 4.7% of loans originated and purchased by bank through 2011 and 0.00% for 2012.

² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2

Institution ID: FNB STL (Included)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2012		Geography: FNB STL MO-IL AA								Evaluation Period: JANUARY 1, 2010 TO					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families ³	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans*** *	Overa ll	Low	Mod	Mid	Upp
Full Review:															
FNB STL AA 2010-2011	1,845	100.00	19.30	3.22	17.30	11.43	21.50	20.22	41.90	65.13	1.36	0.68	0.94	1.20	1.61
FNB STL AA 2012	1,044	100.00	20.89	2.82	16.40	11.39	20.03	21.37	42.68	64.42					

* Based on 2011 Peer Mortgage Data (USPR)

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

*** Percentage of Families is based on the 2000 Census information through 2011 and 2010 Census information for 2012.

**** As a percentage of loans with borrower income information available. No information was available for 5.6% of loans originated and purchased by bank through 2011 and 5.0% for 2012.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: FNB STL (Included)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2012			Geography: FNB STL MO-IL AA			Evaluation Period: JANUARY 1, 2010 TO			
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 STL AA 2010-2011	807	100.00	64.28	57.74	40.02	27.76	32.22	1.25	1.75
FNB STL AA 2012	389	100.00	68.76	58.87	41.65	25.19	33.16	0.00	0.00

* Based on 2011 and 2012 Peer Small Business Data -- US and PR

** 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 – 2011 and 2012).

**** 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 12.14% of small loans to businesses originated and purchased by the bank through 2011; 8.74% for 2012.

Institution ID: FNB STL (Included)

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS 31, 2012		Geography: FNB STL MO-IL AA			Evaluation Period: JANUARY 1, 2010 TO DECEMBER				
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 STL AA 2010-2011	3	100.00	96.85	100.00	0.00	66.67	33.33	0.00	0.00
FNB STL AA 2012	3	100.00	97.25	100.00	100.00	0.00	0.00	0.00	0.00

* Based on 2011 and 2012 Peer Small Business Data -- US and PR

** 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 – 2011 and 2012).

**** 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 the bank.

Institution ID: FNB STL (Included)

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: FNB STL MO-IL AA				Evaluation Period: JULY 1, 2010 TO DECEMBER 31, 2012			
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 STL AA 2010-2012	6	1,416	66	15,621	72	17,036	100.00	0	0

* 'Prior Period Investments' means investments made in a previous 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: FNB STL MO-IL AA				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2012			
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 (2010 Census)							
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp				
Full Review:																					
FNB STL – 5-County AA	100.00	15	100.00	0.00	13.33	6.67	80.00	1	0	0	1	0	0	10.39	17.94	32.71	38.90				

