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Comptroller of the Currency Administrator of National Banks

Washington, DC 20219

# **Public Disclosure**

October 15, 2002

# Community Reinvestment Act Performance Evaluation

First National Bank & Trust Company Charter Number: 1467

> 801 East Broadway Columbia, MO 65205

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 & Trust Company (FNB)** with respect to the Lending, Investment, and Service Tests:

		nal Bank & Trust Co Performance Tests	ompany
Performance Levels	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	Х		Х
Low Satisfactory		Х	
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:

- FNB's distribution of loans by income level of the borrower is good.
- FNB's distribution of loans by income level of geography is good.
- The level of retail banking services is excellent.
- The level of community development services and qualified investments is adequate.

## **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.

**Block Numbering Area (BNA):** A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

**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 lowor 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 moderateincome 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 marriedcouple family or other family, which is further classified into 'male householder' (a family with a male household 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 or a block numbering area 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 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).

**Home Mortgage Loans:** such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

**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 primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

**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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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**

First National Bank & Trust Company (FNB) is a \$341 million intrastate bank headquartered in Columbia, Missouri. The Landrum Company, a multi-bank holding company also headquartered in Columbia, Missouri, owns 96 percent of FNB and has total assets of \$864 million. FNB has nine branches in Boone County, Missouri.

In February 2001, FNB opened a branch in Ashland, Missouri. No branches were closed during the evaluation period. FNB is a full service institution offering various loan and deposit products. FNB's primary business focus is commercial lending to small- and medium-sized businesses. Residential real estate lending is also a significant product for the bank. The assessment area consists solely of Boone County, Missouri. This area comprises the entire Columbia, Missouri metropolitan area.

Net loans as a percentage of total assets are 69 percent as of June 30, 2002. HMDA loans, small business loans, small farm loans, and other real estate secured loans represent 54 percent, 29 percent, 3 percent, and 14 percent of reported loans originated during 1999-2001, respectively. By dollar volume, HMDA loans are 52 percent, small business loans are 26 percent, small farm loans are 2 percent, and other real estate secured loans are 20 percent of reported loans originated during this time frame.

Real estate, commercial, and consumer loans represent 73 percent, 18 percent, and 7 percent, respectively, of the total dollar amount of loans outstanding. The remaining 2 percent consists of other miscellaneous loans. Tier 1 capital is \$31 million, which is 9 percent of total assets.

FNB has no legal, financial, or other factors that impede its ability to help meet the credit needs of its assessment area. FNB's performance was rated "Satisfactory" at its last CRA evaluation dated August 16, 1999.

## Scope of the Evaluation

#### **Evaluation Period/Products Evaluated**

The evaluation period for the Lending Test is 1999 – 2001. For the lending test, we evaluated HMDA, small business, small farm, and other real estate secured loans originated and purchased. For the Investment Test and the Service Test, the evaluation period is January 2, 1999 – October 15, 2002. FNB does not have any qualified Community Development (CD) loans.

#### **Data Integrity**

In July 2002, we tested FNB's publicly filed information on HMDA, small business, small farm, and other real estate secured loan information from 1999-2001 for accuracy. The test included an evaluation of the bank's processes to ensure data is reliable. We did not find any significant errors during this review. All data used to evaluate the bank's performance in its assessment areas (AA) is accurate.

Information regarding CD investments and services was evaluated during this examination.

#### Selection of Areas for Full-Scope Review

Boone County, Missouri, FNB's only AA, received a full-scope review. This represents the entire Columbia, Missouri metropolitan area (MA).

Refer to Appendix A for additional information.

#### Ratings

The bank's overall rating is based entirely on its performance in the Boone County AA. More weight is given to HMDA loans followed by small business loans. The primary HMDA loan product is refinanced loans followed by home purchase loans. The volume of small farm loans is not significant.

#### Other

We conducted two community contacts during this evaluation period with government offices in the AA. We also reviewed one community contact with a government agency made within the last year by another regulatory agency.

Primary credit needs are down payment assistance and low-interest home purchase and rehabilitation loans in low- and moderate-income geographies. We also identified financing for start-up and small businesses, as a primary credit need.

## Fair Lending Review

Our Fair Lending analysis focused on the bank's policies and lending practices used in the underwriting process. Using a sample of diverse applications, both approved and denied, we analyzed each applicant's qualifications with the bank's underwriting standards by comparing application information, qualifications, and loan terms and we determined whether the bank treated each applicant as explicitly required by law. Our review covered the period of January 1, 2002 to September 30, 2002.

Compliance with Fair Lending laws and regulations is satisfactory. We did not identify any violations of the substantive provisions of the anti-discrimination laws and regulations. We found no evidence or pattern of discriminatory practices or disparate treatment. We did not identify any policy or lending practice that would result in harm to the consumer.

## **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 a fullscope review, the bank's performance in the Boone County MA is good.

#### Lending Activity

Refer to Tables 1 (Lending Volume and Other) in appendix C for the facts and data used to evaluate the bank's lending activity.

Lending activity is good. FNB's net loan-to-deposit ratio is 88.63 percent as of June 30, 2002.

FNB is ranked second in deposits in the Boone County MA with a 16 percent market share. This compares to a market share rank of fourth for both home improvement and small business, with five percent and eight percent of the market, respectively. FNB is ranked third in home purchase loans with an overall market share of 8 percent. For home improvement and small farm loans, FNB is ranked second with an overall market share of 22 percent and 24 percent, respectively. Primary products are small business, refinanced, and home purchase loans. Competition from nationwide mortgage and small business lenders impact FNB's market share percentages.

#### Distribution of Loans by Income Level of the Geography

FNB's overall distribution of loans by geography is good. A substantial majority of loans are originated and purchased in the Boone County AA. The bank did not originate or purchase any multifamily loans.

#### Home Mortgage Loans

Refer to Tables 2, 3, and 4 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 is good.

FNB's performance in moderate-income tracts is excellent for home purchase loans. The percentage of loans in moderate-income geographies is near to demographics. In addition, the market share in moderate-income tracts exceeds the overall market share in the AA. Performance in low-income tracts is good for home purchase loans given that only 2 percent of housing is within low-income geographies in the AA.

For home improvement loans, performance in moderate-income tracts is good. While the percentage of bank loans is below demographics, the market share in moderate-income

geographies exceeds the overall market share. In low-income tracts, performance is adequate considering the percentage of housing in these areas.

FNB's performance in moderate-income tracts is good for refinanced loans. The percentage of bank loans is near to demographics in moderate-income geographies and the market share in these areas exceeds the overall market share in the AA. Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is below demographics. However, the market share in low-income tracts exceeds the overall market share.

#### 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 overall geographic distribution of small loans to businesses is good.

FNB's performance in moderate-income geographies is good. The percentage of bank loans in moderate-income tracts is near to demographics and the market share in these areas exceeds the overall market share in the AA. Performance in low-income geographies is good. The percentage of bank loans is below demographics. However, the market share in low-income tracts exceeds the overall market share.

FNB provided information on other real estate secured loans for CRA consideration. This information includes loans secured by nonfarm residential real estate to finance small businesses. These loans are not included as "loans to small businesses". Based on our analysis, performance is adequate in moderate-income tracts. The percentage of bank loans in low-income geographies is not significant.

#### Small Loans to Farms

Refer to Table 7 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The overall geographic distribution of small loans to farms is adequate.

FNB's performance in low-income geographies is good. The percentage of bank loans is near to demographics and the market share in these areas exceeds the overall market share in the AA. Performance in moderate-income geographies is poor. The percentage of bank loans is below demographics and the bank does not have any market share in moderate-income tracts.

Small loans to farms are not a significant loan product for the bank.

#### Lending Gap Analysis

Maps and reports were reviewed to identify any gaps in the geographic distribution of home mortgage loans, small loans to businesses, and small loans to farms. No unexplained or conspicuous gaps were identified.

#### Inside/Outside Ratio

A majority of total loans originated and purchased are within the bank's AAs.

For the period 1999-2001, 91 percent of the number of all loans reviewed were originated or purchased in the AA. By product type, the percentage of home mortgage, small business, small farm, and other real estate secured loans within the AA is 92 percent, 90 percent, 78 percent, and 93 percent, respectively.

The bank's performance was a positive factor in the overall analysis of the geographic distribution of lending.

#### Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level of borrower is good.

#### 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 overall distribution of home mortgage loans by income level of borrower is good. Approximately 9 percent of families are below the poverty level.

FNB's performance to moderate-income individuals is excellent for home purchase loans. The percentage of bank loans exceeds demographics and the market share to moderate-income individuals exceeds the overall market share. Performance to low-income individuals is adequate.

For home improvement loans, FNB's performance to moderate-income individuals is good. The percentage of bank loans and market share to moderate-income individuals is comparable to demographics. Performance to low-income individuals is adequate considering the percentage of families below the poverty level.

FNB's performance to moderate-income individuals is adequate for refinanced loans. Performance to low-income individuals is also adequate given the percentage of families below the poverty level. The market share to low-income individuals exceeds the 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 distribution of small loans to businesses of different sizes is good. The percentage of bank loans to businesses with revenues of \$1 million or less is comparable to demographics. The market share of loans to these businesses exceeds the overall market share.

Regarding the other real estate secured loans provided by FNB for CRA consideration, the distribution of small loans to firms of different sizes is also good. The percentage of bank loans to firms with revenues of \$1 million or less is comparable to demographics.

#### Small Loans to Farms

Refer to Table 12 in the appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

The distribution of small loans to farms of different sizes is excellent. The percentage of loans to farms with revenues of \$1 million or less exceeds demographics. The market share of loans to these farms also exceeds the overall market share.

#### **Product Innovation and Flexibility**

FNB makes use of flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals. The following products are offered:

<u>Homeownership Assistance Program:</u> This is a flexible program that helps low- and moderateincome (LMI) individuals purchase a home. Program participants must meet the HUD LMI guidelines. The city of Columbia, Missouri provides a grant for up to \$2,500 or 5 percent of the purchase price, whichever is less. Borrowers must contribute the greater of at least 2 percent of the purchase price or 50 percent of the down payment. Borrowers must also attend classes to help them understand their credit record and the home buying process. Lenders offer affordable home loan rates. FNB does not track their performance in this program. However, information from our community contact indicated that FNB is one of the major participants.

Low Down Payment Home Loan Program (Affordable Loan): This is a flexible program that offers affordable rates to LMI homebuyers in Boone County. Borrowers are required to have a 2 percent minimum down payment on a maximum purchase price of \$86 thousand for a primary residence. Borrowers cannot own other real estate, must attend a homebuyer class, and must maintain a 2 percent escrow for repairs. During the evaluation period, FNB originated four loans for \$256 thousand.

#### **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 "Low Satisfactory". Based on a fullscope review, the bank's performance in the Boone County MA is adequate.

FNB has a total of \$58 thousand in qualified investments during the evaluation period. This includes a continuing investment of \$28 thousand in a local Community Development Corporation that builds affordable housing in the AA. The remaining balance of \$30 thousand

consists of donations to 16 different organizations that primarily benefit low- and moderateincome individuals and provide affordable housing.

#### SERVICE TEST

#### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test is rated "High Satisfactory". Based on a fullscope review, the bank's performance in the Boone County MA good.

#### **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 distribution of branches in the AA is excellent. The percentage of branches in low- and moderate-income geographies exceeds demographics. One branch was opened during the evaluation period in a middle-income tract. FNB did not close any branches during this time frame. There are no significant differences in services or hours in branches located in low-and moderate-income geographies.

Hours of operation are flexible and based on customer needs. On Monday-Friday, five branches are open from 9:00 a.m. to 5:00 p.m., two branches are open from 8:30 to 6:00 p.m., and the Wal-Mart branch opens at 11:00 a.m. and closes at 7:00 p.m. The Columbia Mall branch is open Monday-Saturday from 9:00 a.m. to 7:00 p.m. Seven branches have lobby hours on Saturday from 9:00 a.m. – 12:00 p.m. The Wal-Mart branch is open from 12:00 p.m. to 7:00 p.m. on Saturday and from 12:00 p.m. to 4:00 p.m. on Sunday.

Six branches have drive-up hours on Monday-Friday from 8:30 a.m. to 6:00 p.m. On Saturday, the drive-up hours at three branches are from 9:00 a.m. to 12:00 p.m., two are open from 9:00 a.m. to 1:00 p.m., and one branch opens at 8:30 a.m. and closes at 12:00 p.m.

FNB's ATM network is an effective alternative delivery system for delivering retail banking services to low- and moderate-income geographies and individuals. FNB has 12 ATMs in the AA. Two ATMs (17 percent) are located in low-income tracts and four ATMs (33 percent) are in moderate-income tracts. The percentage of ATMs in low- and moderate-income geographies exceeds demographics. Ten ATM's accepts deposits. One ATM that does not accept deposits is located at a convenience store and the other is a quick cash ATM at the bank's downtown branch.

FNB offers a free checking account to individuals with a \$100 opening balance. There is no monthly fee, no minimum balance requirements, and unlimited check writing privileges.

FNB offers Internet banking, which allows customers to manage account balances, check account history, transfer funds between accounts, make loan payments, pay bills, etc. In addition, FNB's 24-hour account hotline allows customers to bank by phone to check account balances, transfer funds between accounts, request account statements, and verify deposits

and cleared checks. These services do not impact the service test performance. FNB could not demonstrate the impact of these systems in low- and moderate-income geographies or the use of these systems by low- and moderate-income individuals.

#### **Community Development Services**

FNB's performance in providing CD services is adequate. FNB provides CD services to organizations in the AA through its employees. Financial services are provided to the Columbia Community Development Corporation to help provide affordable housing. Other financial services are provided to organizations that primarily benefit low- and moderate-income individuals. These organizations provide food, dental care, shelter, emergency assistance, day care, job training, academic support, and other services.

## **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 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	Investment and Service	CD Loans): (01/02/99 to 12/31/01) e Tests: (01/01/99 to 10/15/02) y information on CD loans.
Financial Institution		Products Reviewed
First National Bank & Trust Compa Columbia, Missouri	ny (FNB)	HMDA loans Small loans to businesses Small loans to farms Other real estate secured loans Qualified Investments
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Ty	pe of Examination	
Assessment Area	Type of Exam	Other Information
Boone County MA #1740	Full-Scope	Entire MA (includes all of Columbia, Missouri)

## Appendix B: Market Profiles for Full-Scope Areas

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#### Market Profiles for Areas Receiving Full-Scope Reviews

Demographic In	formation for	Full-Scope	e Area: Boo	one Coun	ty MA	
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	29	17.24	17.24	51.72	13.79	0.00
Population by Geography	112,379	14.07	15.57	52.82	17.54	0.00
Owner-Occupied Housing by Geography	23,081	2.42	10.30	63.43	23.85	0.00
Businesses by Geography	5,764	25.07	15.02	47.66	12.25	0.00
Farms by Geography	424	3.54	4.25	78.07	14.15	0.00
Family Distribution by Income Level	25,939	19.20	18.49	23.20	39.11	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	9,776	12.41	18.63	58.88	10.99	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$34,123 = \$57,000 = 17.31%		ousing Value ment Rate as	s of August	1 2002	= \$66,805 = 2.1%

#### **Boone County MA**

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

Source: 1990 U.S. Census, and 2002 HUD updated MFI.

FNB's AA consists of Boone County, which is also the entire Columbia, Missouri MA. FNB has nine branches and 12 ATMs in the AA. Numerous financial institutions provide competition. Financial institutions headquartered in Missouri with less than five offices outside the AA have total assets ranging from \$63 million to \$838 million.

FNB ranks second in deposit market share with 16 percent of the deposits in the AA. FNB is also second in the market for home improvement loans and small loans to farms. FNB is third in the market for home purchase loans and fourth in the market for refinanced loans and small loans to businesses.

Economic conditions are stable. Government sectors, agricultural services, and retail trade primarily provide employment opportunities. Based on three recent community contacts, primary credit needs are down payment assistance and low-interest home purchase and rehabilitation loans in low- and moderate-income geographies. We also identified financing for start-up and small businesses, as a primary credit need.

#### **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: 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. 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<br/>originated and purchased by the bank over the evaluation period by<br/>MA/assessment area. Community development loans to statewide or regional<br/>entities or made outside the bank's assessment area may receive positive CRA<br/>consideration. Refer to Interagency Q&As \_\_.12(i) 5 and 6 for guidance on<br/>when a bank may receive positive CRA consideration for such loans. When such<br/>loans exist, insert a line item with the appropriate caption, such as<br/>"Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area<br/>column and record the corresponding numbers and amounts in the "Community<br/>Development Loans" column.
- Table 1.Other Products Presents the number and dollar amount of any unreported<br/>category of loans originated and purchased by the bank over the evaluation period<br/>by MA/assessment area. Examples include consumer loans or other data that a<br/>bank may provide, at its option, concerning its lending performance. This is a two-<br/>page table that lists specific categories.
- Table 2.Geographic Distribution of Home Purchase Loans Compares the percentage<br/>distribution of the number of loans originated and purchased by the bank in low-,<br/>moderate-, middle-, and upper-income geographies to the percentage distribution<br/>of owner-occupied housing units throughout those geographies. The table also<br/>presents market share information based on the most recent aggregate market<br/>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<br/>distribution of the number of multifamily loans originated and purchased by the<br/>bank in low-, moderate-, middle-, and upper-income geographies to the percentage<br/>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<br/>distribution of the number of loans originated and purchased by the bank to low-,<br/>moderate-, middle-, and upper-income borrowers to the percentage distribution of<br/>families by income level in each MA/assessment area. The table also presents<br/>market share information based on the most recent aggregate market data<br/>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<br/>percentage distribution of the number of small loans (less than or equal to \$1<br/>million) originated and purchased by the bank to businesses with revenues of \$1<br/>million or less to the percentage distribution of businesses with revenues of \$1<br/>million or less. In addition, the table presents the percentage distribution of the<br/>number of loans originated and purchased by the bank by loan size, regardless of<br/>the revenue size of the business. Market share information is presented based on<br/>the most recent aggregate market data available.
- Table 12.Borrower Distribution of Small Loans to Farms Compares the percentage<br/>distribution of the number of small loans (less than or equal to \$500,000) originated<br/>and purchased by the bank to farms with revenues of \$1 million or less to the<br/>percentage distribution of farms with revenues of \$1 million or less. In addition, the<br/>table presents the percentage distribution of the number of the number of loans originated and<br/>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 with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

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

# Table 1. Lending Volume

LENDING VOLUME				Geograph	y: BOONE (	COUNTY		Evaluation Period: JANUARY 2, 1999 TO DECEMBER 31, 2001						
	lortgage	Small Loans to Small Businesses			ns to Farms	Comr Developme	nunity ent Loans <sup>**</sup>		eported ans	% of Rated Area Deposits in MA/AA <sup>****</sup>				
MA/Assessment Area:	Loans (#) in MA/AA <sup>*</sup>	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)			
Full Review:														
BOONE COUNTY	100.00	1,753	157,486	929	74,537	93	4,137	0	0	2,775	236,160	100.00		

Loan Data as of December 31, 2001. Rated area refers to either the state or multi-state MA rating area. The evaluation period for Community Development Loans is From January 02, 1999 to October 15, 2002. Deposit Data as of June 30, 2001. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

# **Table 1. Other Products**

LENDING VOLUME				Ge	eography: I	BOONE (	COUNTY	Evaluation Period: JANUARY 2, 1999 TO DECEMBER 31, 200							
	% of Rated Area	Rated Loans**		Small Business Real Estate Secured**		Home	Home Equity**		Motor Vehicle		Card**	Other Secured Consumer**		% of Rated Area Deposits in AA***	
MA/Assessment Area:	Loans (#) in MA/AA <sup>*</sup>	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)		
Full Review:															
BOONE COUNTY	100.00	443	59,896	443	59,896	0	0	0	0	0	0	0	0	100.00	

Loan Data as of December 31, 2001. Rated area refers to either the state or multi-state MA rating area. The evaluation period for Optional Product Line(s) is From January 02, 1999 to December 31, 2001. Deposit Data as of June 30, 2001. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

## **Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: 1 31, 2001		CHASE			Geograp	hy: BOONE	COUNTY		Evaluation Period: JANUARY 2, 1999 TO DECEMBER						
	Total HomeLow-IncomePurchase LoansGeographies					e-Income aphies		Income aphies	Upper- Geogr	Market Share (%) by Geography				iphy	
MA/Assessment Area:	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:															
BOONE COUNTY	672	100.00	2.42	2.08	10.30	10.27	63.43	58.78	23.85	28.87	7.84	5.66	10.1 8	7.39	8.20

Based on 2000 Peer Mortgage Data: Midwest 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 1990 Census information.

## Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: 31, 2001	HOME IN	IPROVEN	<b>IENT</b>		G	Geography: E	BOONE COU	JNTY	Evaluation Period: JANUARY 2, 1999 TO DECEMBE						
MA/Assessment Area:	Improvement Geog Loans			Income Moderate-Income raphies Geographies			Middle-Income Geographies		Upper-Income Geographies		Ма	rket Shar	re (%) by	hy <sup>*</sup>	
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>****</sup>	% 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:															
BOONE COUNTY	210	100.0 0	2.42	1.43	10.30	7.62	63.43	51.90	23.85	39.05	21.54	0.00	22.22	19.68	27.27

Based on 2000 Peer Mortgage Data: Midwest 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 1990 Census information.

## Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: DECEMBER 31, 2001	HOME N	MORTGA	GE REFINA	NCE		Geograp	hy: BOONE	COUNTY	Evaluation Period: JANUARY 2, 1999 TO						
MA/Assessment Area:	Total Home Mortgage Refinance Loans # % of		ortgage Geographies efinance		Moderate-Income Geographies		Middle-Income Geographies			Income aphies	Mar	ket Shar	e (%) by	Geogra	phy
	#	% of Total <sup>**</sup>	% 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:															
BOONE COUNTY	871	100.0 0	2.42	1.84	10.30	9.53	63.43	58.21	23.85	30.42	5.45	7.69	5.88	4.80	7.06

Based on 2000 Peer Mortgage Data: Midwest 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 1990 Census information.

## Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: DECEMBER 31, 2001	SMALL	LOANS TO	O BUSINES	SES		Geogr	aphy: BOO	NE COUNT	Υ	Evaluation Period: JANUARY 2, 1999 TO					
		Small ss Loans	Low-Ir Geogra	ncome aphies	Moderate Geogra		Middle- Geogra	Income aphies		Income aphies	Market Share (%) by Geograp				y <sup>*</sup>
MA/Assessment Area:	#	% of Total <sup>**</sup>	% of Busines ses***	% BANK Loans	Overal I	Low	Mod	Mid	Upp						
Full Review:															
BOONE COUNTY	929	100.00	25.07	20.02	15.02	13.67	47.66	49.84	12.25	16.47	8.47	10.40	11.65	7.22	9.62

Based on 2000 Peer Small Business Data: US&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 (2001).

## Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: DECEMBER 31, 2001	SMALL	LOANS T	O FARMS			Geography	BOONE C	OUNTY	Evaluation Period: JANUARY 2, 1999 TO						
Total SmallLow-IncomeFarm LoansGeographies						e-Income aphies		Income aphies		Income aphies	Ma	rket Shar	e (%) by	vhy <sup>*</sup>	
MA/Assessment Area:	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:															
BOONE COUNTY	93	100.00	3.54	3.23	4.25	2.15	78.07	83.87	14.15	10.75	23.86	40.00	0.00	24.68	16.67

Based on 2000 Peer Small Business Data: US&PR.

<sup>&</sup>quot;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 (2001).

## **Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: H0 2001	OME PU	JRCHASE	Ē		Geog	Evaluation Period: JANUARY 2, 1999 TO DECEMBER 31,									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers			Income owers	M		arket Share <sup>®</sup>		
	#	% of Total <sup>**</sup>	% Families <sup>**</sup>	% BANK Loans	% Families** *	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
BOONE COUNTY	672	100.0 0	19.20	11.98	18.49	23.35	23.20	26.42	39.11	38.25	8.27	6.58	10.2 9	7.02	8.54

Based on 2000 Peer Mortgage Data: Midwest Region. As a percentage of loans with borrower income information available. No information was available for 3.13% of loans originated and purchased by BANK. Percentage of Families is based on the 1990 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: H 31, 2001	OME II	MPROVEM	ENT		Ge	ography: BO	Evaluation Period: JANUARY 2, 1999 TO DECEMBER								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate Borro	e-Income owers	Middle-Income Borrowers		Upper-Income Borrowers		Market			t Share	
	#	% of Total <sup>**</sup>	% Families <sup>**</sup>	% BANK Loans	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
BOONE COUNTY	210	100.00	19.20	4.93	18.49	16.26	23.20	25.12	39.11	53.69	21.2 6	7.41	17.8 6	20.7 3	25.7 4

Based on 2000 Peer Mortgage Data: Midwest Region. As a percentage of loans with borrower income information available. No information was available for 3.33% of loans originated and purchased by BANK. Percentage of Families is based on the 1990 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: H DECEMBER 31, 2001	OME M	ORTGAGE	E REFINANC	СЕ		Geograph	y: BOONE C	Evaluation Period: JANUARY 2, 1999 TO							
MA/Assessment Area:	Total Home Mortgage Refinance LoansLow-Income 				Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share			are	
			% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp		
Full Review:															
BOONE COUNTY	871	100.00	19.20	7.05	18.49	11.47	23.20	23.30	39.11	58.18	5.91	6.71	2.20	5.72	7.53

Based on 2000 Peer Mortgage Data: Midwest Region. As a percentage of loans with borrower income information available. No information was available for 3.90% of loans originated and purchased by BANK. Percentage of Families is based on the 1990 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.

## Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SI DECEMBER 31, 2001	MALL LO	ANS TO B	USINESSES		Geograp	hy: BOONE COUNTY	Evaluation Period: JANUARY 2, 1999 TO					
	Total	Small	Business	ses With	Loans by	Original Amount Regardles	s of Business Size	Market Share				
	Loa	ns to	Revenues of	\$1 million or								
	Busir	lesses	les	SS								
	#	% of	% of	% BANK	\$100,000 or	>\$100,000 to \$250,000	>\$250,000 to	All	Rev\$ 1 Million or			
		Total	Businesses	Loans	less		\$1,000,000		Less			
MA/Assessment Area:												
Full Review:												
BOONE COUNTY	929	100.00	87.13	75.89	81.16	10.98	7.86	8.47	12.09			

Based on 2000 Peer Small Business Data: US&PR.

<sup>&</sup>quot;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 - 2001).

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 0.11% of small loans to businesses originated and purchased by the bank.

## **Table12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SI 31, 2001	MALL LO	ANS TO F	ARMS		Geography:	BOONE COUNTY	Evaluation Period	Evaluation Period: JANUARY 2, 1999 TO DECEMBER					
		Small to Farms	Farms With I \$1 millio	Revenues of n or less	Loans b	by Original Amount Regardle	ess of Farm Size	Mar	arket Share				
MA/Assessment Area:	# % of Total <sup>**</sup>		** *** ***		\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less				
Full Review:								•					
BOONE COUNTY	93	100.00	96.70	98.92	88.17	9.68	2.15	23.86	23.98				

Based on 2000 Peer Small Business Data: US&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 - 2001). 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.

## **Table 14. Qualified Investments**

QUALIFIED INVESTME	NTS		Geogra	aphy: BOONE COU	NTY	Evaluation Period: JANUARY 2, 1999 TO OCTOBER 15, 2002						
MA/Assessment Area:	Prior Perio	od Investments <sup>*</sup>	Current Perio	od Investments		Total Investments		Unfunded Commitments <sup>**</sup>				
	# \$(000's)		# \$(000's)		#	\$(000's)	% of Total	#	\$(000's)			
Full Review:	·					·						
BOONE COUNTY	1	28	16	30	17	58	100.00	0	0			

<sup>&</sup>lt;sup>\*</sup> 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date. <sup>\*</sup> '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 BranchOpenings/Closings

DISTRIBUTION OF BRA 2, 1999 TO DECEMBER	-	IVERY SY	ŚTEM AN	ID BRAN	CH OPE	NINGS/C	LOSING	S	Geogra	phy: BO	ONE COU	JNTY		Eval	uation Pe	eriod: JAN	NUARY	
	Deposi ts	Branches							Branch Openings/Closings						Population			
MA/Assessment Area:	% of Rated Area	# of BANK Branch	% of Rated Area		Location of Branches by Income of Geographies (%)				# of Branch	Net change in Location of Branches (+ or - )				% of Population within Each Geography				
	Deposi ts in AA	es	Branch es in AA	Low	Mod	Mid	Upp	Openin gs	Closin gs	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Full Review:																		
BOONE COUNTY	100.00	9	100.00	22.22	33.33	33.33	11.11	1	0	0	0	1	0	14.07	15.57	52.82	17.54	