



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Public Disclosure

March 12, 2002

Community Reinvestment Act Performance Evaluation

**The First National Bank of Audrain County
Charter Number 2881**

**203 East Liberty Street
Mexico, MO 65265**

**Office of the Comptroller of the Currency
St. Louis Field Office
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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 **Outstanding**.

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

| Performance Levels | FNB Audrain County Performance Tests | | |
|---------------------------|--------------------------------------|-----------------|--------------|
| | Lending Test* | Investment Test | Service Test |
| Outstanding | X | | X |
| High Satisfactory | | | |
| Low Satisfactory | | X | |
| Needs to Improve | | | |
| Substantial Noncompliance | | | |

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

The major factors that support this rating include:

- The large majority of FNB’s loans were made within the bank’s assessment area.
- The overall distribution of loans by borrower income level is excellent. The distribution of home loans by borrower income level is good. The distribution of small loans to businesses and farms is excellent.
- Based on the limited community development investment opportunities within the AA, the bank’s level of community development investments is adequate.
- The bank has an excellent service delivery system that is readily available to all residents, particularly low- and moderate-income residents.

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also

include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male 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

The FNB is an intrastate bank and is located in Mexico, Missouri. As of December 31, 2001, FNB's total assets were \$122 million. Its main office is located in Mexico, with one branch in Laddonia and one office in Vandalia, Missouri. FNB is a subsidiary of Central Banccompany Inc., a multi-bank holding company headquartered in Jefferson City, Missouri. Consolidated holding company assets totaled \$5.6 billion as of December 31, 2001. The parent organization owns 13 banks throughout Missouri and offers a full range of credit products, deposit accounts, trust services and retail nondeposit investment services.

FNB's loan portfolio is \$83 million, or 68 percent of total assets. The loan portfolio is primarily composed of real estate (66 percent), commercial (12 percent), consumer (12 percent) and agricultural lending (10 percent). As of December 31, 2001, the bank's loan-to-deposit ratio measured 77 percent, its return-on-assets is 1.52 percent and the Tier One Leverage capital ratio is 7.26 percent. There are no legal impediments inhibiting FNB's ability to meet assessment area credit needs.

The bank offers a variety of loan products, including: residential real estate, home improvement, construction, commercial, commercial mortgages, and consumer loans. We reviewed the bank's lending to small businesses, small farms, and home mortgages as part of the CRA evaluation.

The last CRA Public Evaluation was dated February 10, 1997. FNB was rated "Outstanding".

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the lending test includes small business, small farm, and home mortgage loans made from January 1, 1997 through March 12, 2002. Because FNB is not a HMDA reporter, we sampled 118 home mortgage (purchase and refinance) loans originated or purchased during the evaluation period. FNB's originations of home improvement loans were not evaluated, as the volume was not significant enough to perform a meaningful analysis.

The evaluation period for the investment and service tests includes all qualifying community development investments made and services provided from January 1, 1997 through March 12, 2002.

Data Integrity

The OCC verified CRA loan data that was used in the evaluation of the bank's performance during a Data Integrity Review. Samples of small business, small farm, and home mortgage loans were selected in accordance with sampling methods described in the Large Bank CRA Examiner Guidance dated December 2000. The bank is not in a Metropolitan Statistical Area and is not required to collect HMDA data. The bank collects the information and retains it for consideration in CRA performance and to comply with the requirements of the Fair Housing Home Loan Data System regulation. We found the bank's loan data to be accurate.

We reviewed the community development investments, loans, and services submitted by bank management to ensure they met the regulatory definition of community development.

Selection of Areas for Full-Scope Review

We performed a full-scope review of the bank's one AA, Audrain County in Missouri. Refer to the table in Appendix A for more information.

Ratings

The bank's overall rating is based on the full-scope review of its Audrain County AA.

Other

We contacted two community leaders in Mexico, Missouri, during this evaluation. One contact works on economic development in Mexico and the other contact works on providing community development services to low- and moderate-income (LMI) families in Mexico. The contacts did not identify any unmet credit or qualified investment need in the AA.

Fair Lending Review

An analysis of the most recent public comments, consumer complaint information, small farm, and small business lending data was performed according to the OCC's risk-based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending examination was performed in February 1997.

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 "Outstanding". Based on the full-scope review, FNB's performance in the AA is excellent.

Lending Activity

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

FNB generated a good volume of loans within its AA. As of December 31, 2001, the bank's loan-to-deposit ratio was 77 percent. FNB ranks second in deposit market share (27 percent) among the five institutions with offices located within the bank's AA. Based on 2000 CRA aggregate data, FNB was the second largest originator of small loans to businesses and the largest originator of small loans to farms with market shares of 10 percent and 21 percent respectively.

FNB is not a HMDA reporter. However, the bank has tracked the volume of Deed Of Trust (DOT) filings in Audrain County since 1995. The bank's report shows that in 2001, FNB filed the largest number of DOT filings with 222 or 40 percent of the total filings. The competitor with the second largest number of DOT filings had 13 percent. In 2000, FNB filed 308 or 39 percent of the total DOT filings in Audrain County. The competitor with the second largest volume filed 83 DOT filings or 10 percent of the total. Similar results were achieved during the prior years of the evaluation period.

Distribution of Loans by Income Level of the Geography

An analysis of the bank's distribution of loans by geography was not performed. Such an analysis would not be meaningful, as the bank's AA does not have any low- or moderate-income BNAs. As a result, we did not include any tables on the geographic distribution of FNB's loans in this performance evaluation.

Lending Gap Analysis

We evaluated the lending distribution within the AA to determine if any unexplained conspicuous gaps existed. We reviewed lending reports detailing the volume of home mortgage, small business, and small farm loan originations within the AA. There are no conspicuous gaps in the geographic distribution of the bank's loans.

Inside/Outside Ratio

The bank's lending activity within the AA was good and positively impacts the overall Lending Test rating. In all loan categories, a substantial majority of the loans originated within the AA.

Distribution of Loans by Income Level of the Borrower

Based on an analysis of the overall distribution of home mortgage, small business, and small farm loans to borrowers of different income levels, FNB's performance is excellent. The distribution of home purchase and refinance loans is good, while the distribution of small business and small farm loans is excellent.

Home Mortgage Loans

Refer to Tables 8 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.

Overall, the bank's distribution of home purchase and refinance loans by borrower income level is good. Because FNB is not located in a MA, it is not a HMDA reporter. To assess its performance in distributing loans among borrowers by income level, we sampled home purchase and refinance loans originated within the AA during the evaluation period. The conclusions on the distribution of home purchase and refinance loans are based on the results of our sample.

The distribution of home purchase loans by borrower income level is good. The bank's percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families residing within the AA. However, the bank's percentage of home purchase loans to moderate-income borrowers greatly exceeds the percentage of moderate-income families residing within the AA. Also, the bank's penetration to low-income families was hindered by the fact that 15 percent of AA households live below the poverty level. Families in this income category have difficulty qualifying for home purchase loans.

The distribution of refinance loans by borrower income level is excellent. The bank's percentage of refinance loans to low-income borrowers is lower than the percentage of low-income families residing in the AA. However, opportunities for home refinance loans to low-income borrowers are limited based on the difficulty these borrowers have affording home purchase loans as discussed under home purchase loans. The bank's percentage of refinance loans to moderate-income families is slightly below the percentage of moderate-income families residing within the AA.

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 by income level is excellent. The percentage of bank loans to businesses with revenues of \$1 million or less is greater than the percentage of businesses in the AA with revenues of \$1 million or less. In addition, FNB's percentage of loans for \$100 thousand or less exceeds the percentage of businesses with revenues of \$1 million or less. Of all small loans to businesses with revenues of \$1 million or less, the bank has a 14 percent market share. FNB's 14 percent market share for loans to businesses with revenues of \$1 million or less exceeds its market share for all small business loans of 10 percent.

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 by income level is excellent. The percentage of bank loans to farms with revenues of \$1 million or less exceeds the percentage of farms in the AA with revenues less than \$1 million. Also, the substantial majority of the bank's loan originations to small farms were for amounts of \$100 thousand or less. The percentage of loans for \$100 thousand or less substantially meets the percentage of farms with revenues of \$1 million or less. In addition, the bank's 21 percent market share for small loans to farms with revenues of \$1 million or less substantially meets its market share for all small farm loans.

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 lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

Product Innovation and Flexibility

FNB does not offer innovative and flexible loan products specifically targeted to low- or moderate-income individuals.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "Low Satisfactory".

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. While the volume of CD investments (by number and dollar) is low given the bank's size and resources, it is adequate based on the small amount of CD investment opportunities within the AA. Community contacts indicated they were not aware of any opportunities to invest in community development projects in the AA. The area's small population (23,599), rural characteristics and a lack of community development organizations limits the bank's opportunities to make community development investments.

FNB's major investments include a community development corporation that provides loans to small businesses and a local technology center that provides job training. During the current evaluation period, FNB originated \$53,000 in qualified charitable contributions. This includes a \$25,000 donation for a vocational technical school located within the AA. FNB's funds were combined with state and federal assistance to establish the Advanced Technology Center in Mexico. The center provides a variety of vocational skills and other job training to low- and moderate-income residents. Other contributions include \$10,000 to expand a facility that provides jobs targeted at low- and moderate-income residents and \$3,000 to assist the City of Mexico in financing repairs to low-income housing.

The bank continues to maintain its \$40,000 investment in a community development corporation (CDC), which originated during the prior evaluation period. FNB holds the largest investment. The CDC provides small working capital and building rehab loans to small businesses within the AA. However, loan demand remains low, with the CDC's loan portfolio decreasing from \$40,000 at the last examination to \$32,121 as of December 31, 2001.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated Outstanding.

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 delivery systems are readily accessible to all geographies and individuals of different income levels. The bank has three branches located in Mexico, Vandalia, and Laddonia. The AA does not have low- or moderate-income BNAs. However, demographic information indicates that 31 percent of AA residents are low- or moderate-income and 15 percent of AA households live below the poverty level. The substantial majority of low- and moderate-income residents live within close proximity to the bank's main office in Mexico. The main office is located near the center of the community and is within a short walk of a public low-income housing development. In addition, the vast majority of privately owned low- and moderate-income housing is within the immediate area of the bank's main office.

The Vandalia and Laddonia branch offices are centrally located along major roads. These are also rural areas with very small populations. While both BNAs are categorized as middle-income, a significant segment of the population is made up of low- and moderate-income families. In Vandalia, 38 percent of families are low- or moderate-income and 20 percent of families live at or below the poverty level. In Laddonia, 25 percent of families are low- or moderate-income and 10 percent live at or below the poverty level.

All three branches offer a wide range of traditional deposit and loan products. The traditional services are complemented at each branch by a convenient automatic teller machine (ATM) service, which is connected to the Cirrus and Bankmate networks. A fourth ATM is located at Hickman Foods in South Trails shopping center in Mexico. Each branch is a full-service facility with reasonable business hours based on the needs of the community. The bank did not open or close any branch offices during the evaluation period.

The bank also offers a 24-hour Info-Line service over the telephone allowing customers to check account balances and cleared checks, as well as make transfers and loan payments. Because no data was available on how low- and moderate-income residents were affected, we could not place significant weight on the alternative delivery system.

Community Development Services

FNB is a leader in providing community development services in its AA. Senior bank management leads by supporting the major organizations in the AA, that are involved in providing community development services. These services include affordable housing for low- and moderate-income residents, economic stabilization and revitalization of low- and moderate-income areas in the AA, and other services targeted for low- and moderate-income residents. FNB's activities are highly responsive to the AA's primary needs, affordable housing for low- and moderate-income residents and small business development.

The bank's performance is particularly noteworthy given the limited number of opportunities in the AA. The AA is rural and has a small and widely dispersed population. There are very few private organizations serving the AA. These factors make it difficult for bank employees to find opportunities to deliver qualified community development services.

Bank involvement in serving low- and moderate-income individuals is primarily done by working with local boards and committees that promote small businesses and employment opportunities for low- and moderate-income residents within the community. Examples include:

- **Economic and Small Business Development:** Bank officers provided professional expertise to Mexico's Land Redevelopment Authority, which rehabilitates commercial real estate in downtown Mexico. Another notable activity is the bank's involvement in the Industrial Development Authority. A FNB officer serves on the Authority's Board of Directors, providing expertise in evaluating and financing community redevelopment projects. The executive is also actively involved in Mexico's Enterprise Development Corporation, which guarantees small business development loans. These agencies are small and rely heavily on volunteers for the bulk of the administrative work. Bank officers provide critical services, including preparing grant proposals, budgets and other

management reports. Both of these organizations focus on neighborhood revitalization and job creation for low- and moderate-income residents.

- **Consumer Financial Information:** FNB provides technical assistance or financial education to low- and moderate-income residents. The President is involved in a community literacy program aimed to help low- and moderate-income persons become better equipped for the work force. The bank sponsors a "Dollars and Sense" program at a local school. The program teaches money management, saving, and other basic financial topics to high school students. The bank also sponsors the "Your Checking Account" class offered at the high school. The class provides practical financial tools and specifically instructs students on the mechanics of using a checking account. While these programs are open to all students, bank management has found this to be an effective way of providing financial education to the AA's low- and moderate-income students.
- **Affordable Housing:** This organization develops housing for low- and moderate-income families. A bank officer provides financial expertise on budgeting and financing to the Mexico Chapter of Habitat For Humanity.

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 | Lending Test (includes CD Loans): (1/1/97 to 3/31/02) Investment and Service Tests: (1/1/97 to 3/31/02) | |
| Financial Institution | Products Reviewed | |
| The First National Bank of Audrain County Mexico, Missouri | Home Mortgage, Small Business, Small Farm and CD Loans | |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| None | | |
| List of Assessment Areas and Type of Examination | | |
| Assessment Area | Type of Exam | Other Information |
| Audrain County non-MA | Full-Scope | |

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Audrain County..... B-2

| Demographic Information for Full-Scope Area: Audrain County | | | | | | |
|---|------------|---|--------------------|---------------------|-----------------|---------------|
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts/BNAs) | 7 | 0 | 0 | 57.14 | 42.86 | 0 |
| Population by Geography | 23,599 | 0 | 0 | 56.30 | 46.70 | 0 |
| Owner-Occupied Housing by Geography | 6,830 | 0 | 0 | 57.38 | 42.62 | 0 |
| Businesses by Geography | 1,036 | 0 | 0 | 35.33 | 64.67 | 0 |
| Farms by Geography | 287 | 0 | 0 | 62.72 | 37.28 | 0 |
| Family Distribution by Income Level | 6,701 | 16.50 | 14.40 | 22.50 | 46.70 | 0 |
| Distribution of Low- and Moderate-Income Families throughout AA Geographies | 2,069 | 0 | 0 | 60.00 | 40.00 | 0 |
| Median Family Income | = \$28,126 | Median Housing Value Unemployment Rate | | = 35,986 = 2.05% | | |
| HUD Adjusted Median Family Income for 2001 | = \$37,400 | | | | | |
| Households Below the Poverty Level | = 1,401 | | | | | |

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 2001 HUD updated MFI.

FNB's AA is defined as Audrain County of Missouri. The bank is headquartered in the City of Mexico, Missouri, the county seat of Audrain County. Mexico is located in north central Missouri. The AA contains seven Block Numbering Areas (BNAs), four of which are middle-income and three are upper-income. The AA does not contain any low- or moderate-income BNAs.

The HUD adjusted Median Family Income for 2001 is \$37,400. According to the 1990 United States Census Bureau data, 68 percent of AA housing is owner-occupied, 38 percent of households receive social security, and 15 percent of households live below the poverty level.

Major competitors consist of branches of two large multi-national banks and one larger regional bank. The area's economy is largely based on farming, health care services and manufacturing. The unemployment rate for 2001 was 2 percent.

We conducted two community contacts during the examination. The results of the contacts did not identify any unmet credit needs within the community.

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

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

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

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

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item 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 - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

| LENDING VOLUME | | Geography: AUDRAIN COUNTY | | | | | | Evaluation Period: From January 1, 1997 to March 12, 2002 | | | | |
|---------------------|------------------------------------|---------------------------|------------|---------------------------|------------|----------------------|------------|---|------------|----------------------|-----------|--------------------------------------|
| MA/Assessment Area: | % of Rated Area Loans (#) in MA/AA | Home Mortgage | | Small Loans to Businesses | | Small Loans to Farms | | Community Development Loans** | | Total Reported Loans | | % of Rated Area Deposits in MA/AA*** |
| | | # | \$ (000's) | # | \$ (000's) | # | \$ (000's) | # | \$ (000's) | # | \$(000's) | |
| Full Review: | | | | | | | | | | | | |
| Audrain County AA | 00 | 118 | 6,089 | 1,093 | 47,228 | 1,191 | 36,638 | 0.00 | 0.00 | 2,402 | 89,955 | 100.00 |

- Loan Data as of March 12, 2002. Rated area refers to either the state or multi-state MA rating area.
- Deposit data as of June 30, 2001.
- Total under Home Mortgage Loans refers to the totals in the loan sample.

Table 8. Borrower Distribution of Home Purchase Loans

| Borrower Distribution: HOME PURCHASE | | Geography: AUDRAIN COUNTY | | | | | | | | Evaluation Period: From January 1, 1997 to March 12, 2002 | | | | | |
|--------------------------------------|---------------------------|---------------------------|----------------------|------------------|---------------------------|------------------|-------------------------|------------------|------------------------|---|---------------|-----|-----|-----|-----|
| MA/Assessment Area: | Total Home Purchase Loans | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Market Share* | | | | |
| | # | % of Total** | % Families** | % BANK Loans**** | % Families* ** | % BANK Loans**** | % Families* ** | % BANK Loans**** | % Families* ** | % BANK Loans**** | Over all | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Audrain County AA | 52 | 100.00 | 16.50 | 5.77 | 14.40 | 23.08 | 22.50 | 30.77 | 46.70 | 26.92 | NA | NA | NA | NA | NA |

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

** Percentage of families is based on 1990 Census information.

*** As a percentage of loans with borrower income information available.

**** Market share information is not available. Bank is not in an MA and does not report HMDA data.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

| Borrower Distribution: HOME MORTGAGE REFINANCE | | Geography: AUDRAIN COUNTY | | | | | | | | Evaluation Period: From January 1, 1997 to March 12, 2002 | | | | | |
|--|-------------------------------------|---------------------------|----------------------|------------------|---------------------------|------------------|-------------------------|------------------|------------------------|---|--------------|-----|-----|-----|-----|
| MA/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* ** | % BANK Loans**** | % Families* ** | % BANK Loans**** | % Families* ** | % BANK Loans**** | Over all | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Audrain County AA | 66 | 100.00 | 16.50 | 4.55 | 14.40 | 10.61 | 22.50 | 33.33 | 46.70 | 51.55 | NA | NA | NA | NA | NA |

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

** Percentage of Families is based on 1990 Census Information.

*** As a percentage of loans with borrower income information available.

**** Market share Information is not available. Bank is not in an MA and does not report HMDA Data.

Table 11. Borrower Distribution of Small Loans to Businesses

| Borrower Distribution: SMALL LOANS TO BUSINESSES | | | | Geography: AUDRAIN COUNTY | | | Evaluation Period: From January 1, 1997 to March 12, 2002 | | |
|--|---------------------------------|--------------|---|---------------------------|--|-------------------------|---|---------------|-------------------------|
| MA/Assessment Area: | Total Small Loans to Businesses | | Businesses With Revenues of \$1 million or less | | Loans by Original Amount Regardless of Business Size | | | Market Share* | |
| | # | % of Total** | % of Businesses*** | % BANK Loans**** | \$100,000 or less | >\$100,000 to \$250,000 | >\$250,000 to \$1,000,000 | All | Rev \$1 Million or Less |
| Full Review: | | | | | | | | | |
| Audrain County AA | 1,093 | 100.00 | 87.89 | 91.22 | 89.66 | 6.77 | 3.57 | 9.86 | 13.49 |

* Based on 2001 Peer Small Business Data: US

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2001).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

| Borrower Distribution: SMALL LOANS TO FARMS | | Geography: AUDRAIN COUNTY | | Evaluation Period: From January 1, 1997 to March 12, 2002 | | | | | |
|---|----------------------------|---------------------------|--|---|--|-------------------------|-------------------------|--------------|-------------------------|
| MA/Assessment Area: | Total Small Loans to Farms | | Farms With Revenues of \$1 million or less | | Loans by Original Amount Regardless of Farm Size | | | Market Share | |
| | # | % of Total** | % of Farms*** | % BANK Loans**** | \$100,000 or less | >\$100,000 to \$250,000 | >\$250,000 to \$500,000 | All | Rev \$1 Million or Less |
| Full Review: | | | | | | | | | |
| Audrain County AA | 1,191 | 1.00 | 97.56 | 99.41 | 93.37 | 5.88 | 0.76 | 20.98 | 20.66 |

* Based on 2001 Peer Small Business Data: US.

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2001).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms..

Table 14. Qualified Investments

| QUALIFIED INVESTMENTS | | | | | | | | | |
|--|--------------------------|-----------|----------------------------|-----------|-------------------|-----------|------------|------------------------|-----------|
| Geography: AUDRAIN COUNTY | | | | | | | | | |
| Evaluation Period: January 1, 1997 to March 12, 2002 | | | | | | | | | |
| MA/Assessment Area: | Prior Period Investments | | Current Period Investments | | Total Investments | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | \$(000's) | % of Total | # | \$(000's) |
| Full Review: | | | | | | | | | |
| | 1 | 40 | 7 | 53 | 8 | 93 | 100.00 | 0.00 | 0.00 |

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

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

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

| DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: AUDRAIN CO. Evaluation Period: From January 1, 1997 to March 8, 202 | | | | | | | | | | | | | | | | | |
|--|--------------------------------|--------------------|--------------------------------|---|-----|------|------|--------------------------|----------------------|---|-----|-----|-----|---------------------------------------|-----|-------|-------|
| MA/Assessment Area: | Deposits | Branches | | | | | | Branch Openings/Closings | | | | | | Population | | | |
| | % of Rated Area Deposits in AA | # of BANK Branches | % of Rated Area Branches in AA | Location of Branches by Income of Geographies (%) | | | | # of Branch Openings | # of Branch Closings | Net change in Location of Branches (+ or -) | | | | % of Population within Each Geography | | | |
| | | | | Low | Mod | Mid | Upp | | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | | | |
| Audrain County AA | 100.00 | 3 | 100.00 | NA | NA | 66.6 | 33.4 | 0 | 0 | NA | NA | NA | NA | NA | NA | 56.30 | 43.70 |