



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

October 26, 2009

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of St. Louis
Charter Number: 12333

7707 Forsyth Boulevard
Clayton, MO 63105

Office of the Comptroller of the Currency

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

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated "Needs to Improve".

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

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

- We found the bank to be in substantive noncompliance with the Fair Housing Act and the Equal Credit Opportunity Act. The violations had a significant adverse impact on the bank's CRA performance, resulting in a lowering of its overall CRA rating to Needs to Improve. Refer to the "Fair Lending or Other Illegal Credit Practices" section of this performance evaluation for additional information.
- The bank achieved an adequate lending volume during the evaluation period.
- The overall distribution of loans by borrower income is adequate.
- The geographic distribution of the bank's loans is poor. We noted conspicuous gaps in the bank's geographic distribution of HMDA-reportable and small business loans.
- FNB originated an excellent volume of community development loans, which had a significantly positive impact on FNB's overall Lending Test performance.
- FNB originated a good volume of community development investments. The investments were responsive to identified assessment area (AA) needs.
- The bank's retail delivery system is not accessible to individuals and geographies of different income levels.

Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Metropolitan Division: As defined by the Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

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

Description of Institution

First National Bank of St. Louis (FNB) is a full-service interstate bank headquartered in Clayton, Missouri. The bank has eleven offices in Missouri and three in Illinois. FNB is a subsidiary of Central Banccompany, Inc., a \$9 billion bank holding company headquartered in Jefferson City, Missouri. As of September 30, 2009, FNB had assets of \$1.4 billion, net loans of \$1.2 billion, and Tier One Capital of \$129 million.

In November 2007, FNB completed its purchase of the First National Bank of Millstadt, in Millstadt, Illinois. The First National Bank of Millstadt had one branch office and total assets of approximately \$86 million.

FNB's operations are primarily centered in the western portion of the St. Louis Missouri/Illinois Multi-State MSA. The bank's business focus is largely on commercial real estate lending within its local market area. Competition in the MSA is intense and includes numerous financial service providers.

The bank offers a full range of banking products and services to individuals and small businesses. The composition of the loan portfolio includes: real estate loans at 87 percent, commercial loans at 7 percent, individual loans at 2 percent, and other loans at 4 percent.

In 2008, among the 602 Home Mortgage Disclosure Act (HMDA) reporters in the assessment area (AA), FNB ranked 20th in HMDA loan originations by dollar volume, with a 1 percent market share. The bank is one of 108 CRA-reporting small business lenders in the AA and ranked 7th by dollar volume, with a 4.60 percent market share for CRA-reported small business loans.

FNB received a "Satisfactory" rating at the last CRA examination dated August 15, 2006. There are no legal, financial, or other factors that would impede the bank's ability to help meet the credit needs of its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The Performance Evaluation (PE) assesses information since the previous CRA examination. The evaluation period for our review of the bank's community development loans, investments, and services, as well as retail banking services covers the period from July 1, 2006 through June 30, 2010. The evaluation period for our review of the bank's HMDA and small business loan originations includes loans originated from January 2, 2006 through December 31, 2009.

Data Integrity

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

Selection of Areas for Full-Scope Review

We conducted an analysis of the bank's assessment areas (AAs) to ensure they met the requirements under the CRA and to select the areas for a full-scope review. Throughout this evaluation period, FNB defined two separate AAs, both located within the St. Louis Missouri/Illinois Multi-State MSA. The Missouri AA included all of St. Charles County, all of Warren County, and the southern and central portions of St. Louis County. This AA excluded the northern portion of St. Louis County and the entire City of St. Louis, Missouri. Similarly, the Illinois AA included all of Monroe County and the southeastern two-thirds of St. Clair County. This AA excluded the northern portions of St. Clair County, including the City of East St. Louis, Illinois.

The bank's AAs did not comply with the CRA. The excluded geographies contain a substantial portion of the Multi-State MSA's low- and moderate-income residents and census tracts. The OCC redrew the AA to comply with the CRA, and this evaluation is based on FNB's performance within the redrawn AA. The redrawn AA includes the entire portion of St. Charles County, St. Louis County and St. Louis City in Missouri and St. Clair County and Monroe County in Illinois. This redrawn AA is reasonable and does not arbitrarily exclude low- and moderate-income CTs.

Ratings

Lending Test conclusions were substantially influenced by the geographic distribution of FNB's HMDA-reportable loans and small business loans. In addition, we considered the distribution of loans by borrower income, business revenue, and CD lending activity. Also, we considered the volume of lending, the AA's credit needs, and other contextual factors. Multifamily loans and small loans to farms represented low loan volumes; these loans did not receive any significant weight under the Lending Test conclusions.

Other

During the examination, we received a public comment letter from a consortium of community organizations regarding FNB's performance under the CRA. The organizations raised concerns with respect to the following issues:

- The number of home mortgage loan originations made to African Americans,
- The denial rates for African American home mortgage loan applicants,
- The location of the bank's branch offices, and
- The bank's community delineation (assessment areas).

We considered these comments in our evaluation, and our conclusions are described in this document.

In addition, we held a meeting with representatives of the organizations to further discuss their concerns regarding FNB's performance under the CRA and to answer questions involving the CRA performance evaluation process. We also solicited their views regarding credit and investment needs in the AA. These organizations focus on improving housing for low- and moderate-income residents, fighting racial discrimination, and promoting economic development in low- and moderate-income geographies.

We asked the bank to make the comments received by our Office regarding its performance available in its CRA public file.

Meeting attendees pointed to a need for additional bank branch offices in low- and moderate-income geographies throughout the multi-state MSA as a primary need. Improving the number and quality of housing in low- and moderate-income geographies and job creation were also mentioned as critical needs.

Fair Lending or Other Illegal Credit Practices Review

We identified substantive violations of the Equal Credit Opportunity Act and its implementing regulation (Regulation B), as well as the Fair Housing Act, during a fair lending examination conducted in conjunction with this CRA evaluation. The violations represented a pattern or practice of discrimination on a prohibited basis and resulted in a lowering of the bank's CRA rating. Although bank management had implemented certain policies, procedures and other controls to ensure compliance with fair lending laws, they were not effective in preventing the violations. Bank management has committed to specific actions intended to correct the violations, strengthen the fair lending program, and improve the bank's CRA performance.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

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

Lending levels reflect adequate responsiveness based on AA credit needs and the bank's deposit market share. According to the FDIC's deposit market share data as of June 30, 2009, the bank has a deposit market share of 1.84 percent, which ranks 12th in the AA.

FNB's level of small business lending is good. Measured by dollar volume, the bank's market share for small business loans was 4.60 percent. Particularly noteworthy, the bank's market share for loans to businesses with revenues of \$1 million or less was 6.40 percent. Also, the average loan size for each of the top five market leaders was less than \$10,000 compared to an average loan size of \$261,000 for FNB's small business loans.

Overall home lending activity was adequate. FNB's market share for home purchase loans was 1.02 percent, ranking 27th among 435 lenders that reported home purchase loans. The bank's market share for home refinance loans is not significant at less than one percent. The bank's market share for home improvement loans was 1.07 percent, ranking 23rd among 182 lenders that reported home improvement loans. The lower lending market share for home purchase loans and home refinance loans reflects the high number of competitors in the AA.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

The geographic distribution of home purchase loans is poor. FNB's portion of these loans made in low-income geographies is significantly less than the percentage of owner-occupied housing units in low-income geographies. However, lending opportunities in low-income geographies are extremely limited as these geographies contain just four percent of the AA's owner-occupied housing units. The bank's portion of these loans in moderate-income geographies was less than the percentage of owner-occupied housing units in these geographies. FNB's market share for home purchase loans is not significant.

FNB's home improvement loan geographic distribution is good. The bank's portion of these loans made in low- and moderate-income geographies was near to the percentage of owner-occupied housing units in low- and moderate-income geographies. However, FNB's market share for home improvement loans is not significant and we gave less weight to home improvement loans in determining the bank's Lending Test performance.

The geographic distribution of FNB's home mortgage refinance loans is very poor. The percentage of FNB's loans to low- and moderate-income geographies was significantly less than the percentage of owner-occupied housing in these geographies. However, the bank's performance is impacted by the extremely low percentage of owner-occupied housing units in low-income geographies.

Small Loans to Businesses

The bank's geographic distribution of small loans to businesses is poor. FNB's portion of these loans made in low- and moderate-income geographies is less than the percentage of AA businesses in low- and moderate-income geographies. FNB's market share for these loans was not significant.

Small Loans to Farms

We did not evaluate the geographic distribution of the bank's originations and purchases of small loans to farms. This product was not identified as an AA credit need and FNB's volume of small loans to farms is too small to conduct a meaningful analysis.

Lending Gap Analysis

We identified significant conspicuous geographic gaps in FNB's lending distribution. FNB did not originate any HMDA-reportable loans in 63 or 16 percent of the census tracts in its AA. These census tracts contain eight percent of the AA's families, and 89 percent of the census tracts are designated as low- or moderate-income. In addition, the bank did not originate any small business loans in 196 or 49 percent of the AA's census tracts. These census tracts contain 28 percent of the AA's non-farm businesses, and 60 percent of the census tracts are designated as low- or moderate-income. Also, there were 53 census tracts in which FNB did not originate any HMDA-reportable or small business loans. We used reports and maps to compare the geographies with no loan originations to the geographies in the AA. We considered competition, economic conditions, and demographic data in our analysis. The bank's poor loan penetration in these census tracts had a negative impact on its overall Lending Test performance.

Inside/Outside Ratio

The bank made a good percentage of its loans within its AA. By number, 83 percent of the bank's HMDA-reportable home mortgage loans and 90 percent of the bank's small business loans were originated within the AA. These strong results had a positive impact on the bank's Lending Test performance.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

FNB's borrower distribution of home purchase loans is adequate. The bank's percentage of these loans made to low-income borrowers is significantly less than the percentage of low-income families in the AA. However, lending to low-income borrowers is adequate after taking into consideration the percentage of families living below the poverty level (8 percent). The bank's percentage of these loans made to moderate-income borrowers significantly exceeds the percentage of moderate-income families. FNB's market share for home purchase loans was not significant.

FNB's borrower distribution of home improvement loans is adequate. The bank's percentage of these loans made to low-income borrowers was significantly less than the percentage of low-income families. However, lending to low-income borrowers is adequate after considering the percentage of families living below the poverty level. The bank's percentage of these loans made to moderate-income borrowers was near to the percentage of moderate-income families. FNB's market share for these loans was not significant.

FNB's borrower distribution of home mortgage refinance loans is adequate. The bank's percentage of these loans made to low-income borrowers was significantly less than the percentage of low-income families. However, lending to low-income borrowers is adequate after considering the percentage of families living below the poverty level. The bank's percentage of these loans made to moderate-income borrowers was near to the percentage of moderate-income families. FNB's market share for these loans was not significant.

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 originations and purchases of small loans to businesses.

The borrower distribution of small loans to businesses is adequate. The bank's percentage of small loans made to businesses with annual revenues of \$1 million or less is lower than the percentage of such businesses within the AA. However, this performance is adequate after considering the downturn in the local and national economies during the latter part of the evaluation period, and its negative impact on small business lending needs and opportunities. FNB's market share for loans to businesses with revenues of \$1 million or less exceeds its overall market share. Also, the majority of FNB's small business loan originations were in the amount of \$250,000 or less.

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. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

The bank originated an excellent volume of CD loans in the AA. FNB's CD lending had a significantly positive impact on the bank's Lending Test performance. During the evaluation period, FNB originated 18 CD loans totaling \$70.9 million that directly benefited the AA. These include 10 loans to revitalize/stabilize low- and moderate-income neighborhoods, 3 loans to fund economic development activities, and 5 loans to provide affordable housing for low- and moderate-income residents and other community development services.

In addition to the strong dollar volume, the complexity of the CD loans demonstrates excellent responsiveness to the AA's needs. The loans supporting neighborhood revitalization/stabilization and economic development often require the complex use of multiple nontraditional funding sources including federal and state tax credits, local property tax abatements, and special taxing districts.

Product Innovation and Flexibility

FNB participates in several national and state government-sponsored loan programs that utilize flexible underwriting criteria to help AA residents obtain home mortgage loans. These loans are included in the bank's total HMDA-reportable loans.

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 "High Satisfactory." FNB demonstrated good responsiveness in addressing the AA's needs through direct investments in affordable housing projects for low- and moderate-income residents. By dollar, the vast majority of the investments were in tax credit equity funds that financed low- and moderate-income housing developments. Some of these investments were in securities that help provide market liquidity to originators of mortgage loans for low- and moderate-income borrowers in the AA.

During the evaluation period, FNB made 28 investments totaling \$6.9 million in the AA. The bank also had 12 outstanding prior investments totaling an additional \$1.5 million. Almost 94 percent (by dollar) of FNB's current period investments focused on affordable housing, a primary AA credit need. Also noteworthy is the bank's financial support provided to a nonprofit organization that delivers innovative and comprehensive home ownership counseling and training to low-income families, helping them purchase their first home and

sustain homeownership for the long term. The training covers home purchase, home improvement, home management, insurance services, and money management. The volume and nature of the bank's investments demonstrate good responsiveness to AA needs.

SERVICE TEST

The bank's performance under the Service Test is rated "Needs to Improve". Based on full-scope reviews, FNB's performance in the combined AA is poor.

Retail Banking Services

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

FNB's retail delivery systems are accessible to a limited number of geographies and individuals of different income levels. FNB does not have any branch offices located in low- or moderate-income geographies. However, 28 percent of the AA's overall population and 46 percent of the AA's low- and moderate-income families reside in low- and moderate-income geographies. The bank's eleven Missouri branch offices are located primarily within the western St. Louis County and St. Charles County. These geographies consist mostly of middle- and upper-income census tracts. In Illinois, FNB has two branch offices in middle-income geographies and one branch office in an upper-income geography. The location of FNB's branch offices makes it difficult for low- and moderate-income residents to access the bank's retail delivery system.

The bank opened two branch offices in upper-income geographies and did not close any branch offices during this evaluation period.

FNB's branch hours, products, and services do not vary significantly by branch location. Branches are typically opened for business Monday through Thursday at 8:30 or 9:00 a.m. and are closed at 5:00 p.m., with extended hours offered on Friday. With the exception of one, all branches are open for three hours on Saturdays.

The bank offers automated teller machines as an alternative delivery system in its AA. Due to a lack of data on its usage, we were unable to determine its impact on low- and moderate-income borrowers or geographies.

Community Development Services

FNB's performance in providing CD services in the combined AA is adequate. The bank's officers and employees provided CD services by lending their professional expertise to 14 organizations that focus on small business development and social service needs of low- and moderate-income families.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): January 2, 2006 to December 31, 2009 Investment and Service Tests and CD Loans: July 1, 2006 to June 30, 2010	
Financial Institution		Products Reviewed
First National Bank of St. Louis (FNB), Clayton, Missouri		Home mortgage loans, Small Business loans, Community Development (CD) loans, CD Investments, and CD Services
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
FNB Revised AA	Full-Scope	

Appendix B: Market Profiles for Full-Scope Areas

St. Louis Missouri/Illinois Metropolitan Statistical Area

FNB - Revised AA

Demographic Information for Full Scope Area: FNB Revised AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	401	13.22	23.44	35.91	26.43	1.00
Population by Geography	1,932,088	7.53	20.36	40.33	31.77	0.01
Owner-Occupied Housing by Geography	525,154	4.05	17.03	43.12	35.80	0.00
Business by Geography	139,266	6.14	18.02	38.38	37.06	0.40
Farms by Geography	2,967	1.79	10.21	55.11	32.76	0.13
Family Distribution by Income Level	503,125	19.30	17.30	21.50	41.90	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	184,145	14.14	31.56	39.57	14.73	0.00
Median Family Income HUD Adjusted Median Family Income for 2009 Households Below Poverty Level		53,435 67,900 10%	Median Housing Value Unemployment Rate (2000 US Census)		112,644 2.95%	

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

Source: 2000 US Census and 2009 HUD updated MFI

During the CRA examination, FNB's management agreed to a revised AA that greatly expanded the number of low- and moderate-income geographies. The revised AA complies with the CRA and does not arbitrarily exclude any low- or moderate-income areas. The entire AA is located within the boundaries of the St. Louis MO-IL Multistate Metropolitan Statistical Area. The AA includes all of St. Charles County, St. Louis County, and St. Louis City in Missouri and all of St. Clair County and Monroe County in Illinois.

The AA contains 401 census tracts, of which 13 percent are low-income, 23.5 percent are moderate-income, 36 percent are middle-income, and 26.5 percent are upper-income. One percent of the census tracts lacked income information and are characterized as NA. The 2009 HUD adjusted median family income for the revised AA is \$67,900, and ten percent of AA households fall below the poverty level.

The area's largest employers include BJC Healthcare, Boeing Integrated Defense Systems, Schnucks Markets, Scott Air Force Base, and SSM Health Care.

The area economy is currently in a major recession. According to the U.S. Department of Labor Bureau of Labor Statistics, the September 30, 2009 unemployment rate for the MSA stood at 9.9 percent. This reflects a significant increase in joblessness when compared to the 4.8 percent unemployment rate on September 30, 2006. According to the National Association of Realtors, the median sales price of existing single-family homes in the St. Louis Multistate MSA declined from \$145,400 in 2007 to \$127,000 in 2009. The local economy was greatly

impacted by the closure of the Chrysler car manufacturing plant in Fenton, Missouri, resulting in the loss of approximately 1,500 higher-paying manufacturing jobs. Other industries that are experiencing higher unemployment include retail sales, wholesale trade, and transportation.

Numerous CD opportunities are available in the bank's AA. Financial institutions can participate in affordable housing development projects and small business lending programs. They can also partner with local organizations that have a CD purpose. Community contacts identified an extensive list of CD needs, including funding of foreclosure prevention programs, low-cost small business financing, and affordable rental housing for low- and moderate-income residents.

Banking competition is strong with 85 FDIC-insured institutions with 654 branch offices operating in the AA. Deposits are somewhat concentrated with five institutions holding 57 percent of the AA's deposits. These institutions include US Bank N.A. with a 21 percent deposit market share; Bank of America, N.A. with 13 percent; Southwest Bank with 9 percent; Commerce Bank N.A. with 7 percent, and Scottrade Bank with 7 percent.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage

distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and

purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

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

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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

Institution ID: First National Bank of St. Louis

Table 1. Lending Volume

LENDING VOLUME		graphy: ST. LOUIS MO-IL MSA						Evaluation Period: JANUARY 2, 2006 TO DECEMBER 31, 2009				
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
FNB STL - Revised AA	100.00	4,045	757,354	1,720	415,845	7	574	18	70,960	5,790	1,173,773	100.00

* Loan Data as of December 31, 2009. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 1, 2006 to June 30, 2010.

*** Deposit Data as of June 23, 2010. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: First National Bank of St. Louis

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: ST. LOUIS MO-IL MSA						Evaluation Period: JANUARY 2, 2006 TO DECEMBER 31, 2009						
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
FNB STL - Revised AA	1,645	100.00	4.05	1.52	17.03	11.25	43.12	39.82	35.80	47.42	1.02	1.18	0.84	0.82	1.33

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Institution ID: First National Bank of St. Louis

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: ST. LOUIS MO-IL MSA						Evaluation Period: JANUARY 2, 2006 TO DECEMBER 31, 2009						
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
FNB STL - Revised AA	95	100.00	4.05	3.16	17.03	14.74	43.12	30.53	35.80	51.58	1.07	1.40	0.71	0.82	1.58

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Institution ID: First National Bank of St. Louis

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: ST. LOUIS MO-IL MSA				Evaluation Period: JANUARY 2, 2006 TO DECEMBER 31, 2009							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
FNB STL - Revised AA	2,282	100.00	4.05	0.96	17.03	5.17	43.12	32.69	35.80	61.17	0.71	0.26	0.23	0.60	0.99

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Institution ID: First National Bank of St. Louis

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: ST. LOUIS MO-IL MSA						Evaluation Period: JANUARY 2, 2006 TO DECEMBER 31, 2009						
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
FNB STL - Revised AA	19	100.00	11.64	5.26	19.46	15.79	46.35	63.16	22.55	15.79	1.86	0.00	0.00	3.95	0.00

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Institution ID: First National Bank of St. Louis

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES					Geography: ST. LOUIS MO-IL MSA				Evaluation Period: JANUARY 2, 2006 TO DECEMBER 31, 2009						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
FNB STL – Revised AA	1,712	100.00	6.14	1.05	18.02	6.02	38.38	33.53	37.06	59.40	0.66	0.18	0.34	0.59	0.86

* Based on 2008 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2009).

Institution ID: First National Bank of St. Louis

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS				Geography: ST. LOUIS MO-IL MSA				Evaluation Period: JANUARY 2, 2006 TO DECEMBER 31, 2009							
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
FNB STL - Revised AA	7	100.00	1.79	0.00	10.21	28.57	56.27	71.43	32.76	0.00	0.56	0.00	0.00	0.93	0.00

* Based on 2008 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2009).

Institution ID: First National Bank of St. Louis

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: ST. LOUIS MO-IL MSA						Evaluation Period: JANUARY 2, 2006 TO DECEMBER 31, 2009						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
FNB STL - Revised AA	1,647	100.00	19.30	6.68	17.30	23.20	21.50	24.52	41.90	45.60	1.16	0.59	1.03	1.21	1.35

* Based on 2008 Peer Mortgage Data (Western)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 8.1% of loans originated and purchased by bank.

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

Institution ID: First National Bank of St. Louis

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: ST. LOUIS MO-IL MSA						Evaluation Period: JANUARY 2, 2006 TO DECEMBER 31, 2009						
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ²	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
FNB STL – Revised AA	95	100.00	19.30	4.17	17.30	12.50	21.50	18.06	41.90	65.28	0.79	0.64	0.29	0.31	1.37

^{*} Based on 2008 Peer Mortgage Data (Western)

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

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

^{****} As a percentage of loans with borrower income information available. No information was available for 24.2% of loans originated and purchased by bank.

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

Institution ID: First National Bank of St. Louis

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: ST. LOUIS MO-IL MSA				Evaluation Period: JANUARY 2, 2006 TO DECEMBER 31, 2009								
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families ³	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans*** *	Over all	Low	Mod	Mid	Upp
Full Review:															
FNB STL - Revised AA	2,284	100.00	19.30	3.71	17.30	13.01	21.50	23.36	41.90	59.92	0.83	0.44	0.48	0.63	1.13

* Based on 2008 Peer Mortgage Data (Western)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 9.1% of loans originated and purchased by bank.

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

Institution ID: First National Bank of St. Louis

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: ST. LOUIS MO-IL MSA			Evaluation Period: JANUARY 2, 2006 TO DECEMBER 31, 2009			
	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
Assessment Area:	#	% of Total**	% of Businesses***	% BANK****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
FNB STL - Revised AA	1,720	100.00	75.23	50.41	43.60	23.60	32.79	0.66	1.05

* Based on 2008 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2009).

**** 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 14.77% of small loans to businesses originated and purchased by the bank.

Institution ID: First National Bank of St. Louis

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: ST. LOUIS MO-IL MSA			Evaluation Period: JANUARY 2, 2006 TO DECEMBER 31, 2009			
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [*]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
FNB STL - Revised AA	7	100.00	97.20	57.14	85.71	14.29	0.00	0.56	0.41

^{*} Based on 2008 Peer Small Business Data -- US and PR

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

^{***} Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2009).

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

Institution ID: First National Bank of St. Louis

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: ST. LOUIS MO-IL MSA					Evaluation Period: JULY 1, 2006 TO JUNE 30, 2010				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
FNB STL - Revised AA	12	1,482	0	6,927	40	8,409	100.00	0	0

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

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

Institution ID: First National Bank of St. Louis

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: ST. LOUIS MO-IL MSA								Evaluation Period: JANUARY 2, 2006 TO DECEMBER 31, 2009									
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
FNB STL - Revised AA	100.00	14	0.00	0.00	0.00	28.57	71.43	2	0	0	0	0	0	7.53	20.36	40.33	31.77