



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

**November 17, 2003**

# **Community Reinvestment Act Performance Evaluation**

**First National Bank of Jasper  
Charter Number: 7746**

**200 West 18th Street  
Jasper, AL 35502**

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

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# Overall CRA Rating

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

The following table indicates the performance level of the **First National Bank of Jasper** (FNB) with respect to the lending, investment, and service tests:

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

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

The major factors that support this rating include:

- Overall, FNB’s lending activity reflects an excellent responsiveness to meeting the credit needs of the assessment area (AA).
- Overall, FNB’s distribution of loans by income level of the borrower is excellent. The distribution of home mortgage loans is excellent. FNB’ distribution of small loans to businesses and farms is excellent.
- The high level of CD loans had a positive impact on the lending test rating given the limited opportunities to make CD loans in the AA.
- Given the limited opportunities to make CD investments in Walker County, FNB’s level of qualified investments is adequate.
- FNB’s delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the full-scope AA.
- FNB had a high level of community development services considering the limited opportunities. CD services had a positive impact on their service test rating.

## 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 First National Bank of Jasper (FNB) is a \$544 million intrastate bank headquartered in Jasper, Alabama. FNB's AA includes Walker County, AL in its entirety. FNB operates 8 branches, 5 cash dispensing and 1 deposit-taking ATMs throughout the AA. The AA is comprised of 19 census tracts, none of which are designated as low- or moderate-income.

FNB is a wholly owned subsidiary of Synovus Financial Corp. based in Columbus, Georgia. Synovus (NYSE symbol: "SNV") is a diversified financial services holding company with more than \$21 billion in assets. Synovus provides integrated financial services including banking, financial management, insurance, mortgage and leasing services through 41 affiliate banks and other Synovus offices in Georgia, Alabama, South Carolina, Florida and Tennessee; and electronic payment processing through an 81-percent stake in TSYS (NYSE symbol: "TSS"), the world's largest third-party processor of international payments.

FNB does not operate any subsidiaries. However, at their request, the home mortgage lending activity of Synovus Mortgage Company (an affiliate of FNB) is included in this Performance Evaluation.

As of September 30, 2003, loans totaled \$432 million and deposits totaled \$397 million. Loans represent 79 percent of total assets. The distribution of FNB's loan portfolio was as follows: commercial (includes commercial real estate) (42.16 percent); 1-4 family residential properties (19.04 percent); consumer loans (8.80 percent), agricultural (1.03 percent), and other loans (28.97 percent). As illustrated by their loan mix, FNB is primarily a commercial lender. Small farm lending is not a significant product for FNB. FNB's Tier One Capital is \$46 million and risk-based capital to risk weighted assets equals 10.77 percent. Tier One Leverage Capital equaled 8.30 percent.

FNB is the dominant financial institution in the AA with a deposit market share of 48 percent. In terms of deposit market share, FNB's primary competitors are Pinnacle Bank (16.7 percent), Compass Bank (8.89 percent), and Colonial Bank (8 percent). Other competitors with less than a 5 percent market share are Southtrust Bank, Security Federal Savings Bank, AmSouth Bank, First National Hamilton, Regions Bank, and Traders & Farmers Bank.

There are no legal, financial or other factors impeding FNB's ability to help meet the credit needs in its AA. FNB's CRA performance was rated "Satisfactory" in the previous public evaluation dated July 24, 2000.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This Performance Evaluation assesses FNB's performance under the lending, investment and service tests. In evaluating FNB's lending performance, we reviewed residential mortgage loans and small loans to businesses and farms. FNB is not a HMDA reporter. However, FNB chose to collect the data for CRA evaluation purposes. The first year that FNB collected HMDA data was 2001. The home mortgage lending activity for 2000 reflected in this PE is that of the mortgage company.

The evaluation period for the home mortgage and small business and farm loans is January 1, 2000 through December 31, 2002. For CD loans, the investment test and the services test, the evaluation period is July 24, 2000 through November 17, 2003.

### Data Integrity

Prior to our previous CRA examination, we performed a data verification review. FNB's home mortgage loans and loans to small businesses and farms loan data was tested for accuracy. We determined that FNB's data was accurate. Also, we reviewed FNB's data collection, verification and reporting processes to ensure that they were adequate.

During this evaluation, we reviewed FNB's data collection, verification and reporting processes to determine that no major changes had occurred, and to ensure our evaluation is based on accurate data. Our review concluded that FNB's processes remain adequate, and that our evaluation could rely on FNB's data.

CD loans, investments and services submitted by management were verified to ensure that they met the regulatory definition for CD. Some items submitted by FNB were excluded from this evaluation because they did not meet the definition of CD.

### Selection of Areas for Full-Scope Review

FNB has one AA, Walker County. This AA received a full-scope review. Refer to the table in Appendix A for more information.

### Ratings

FNB's overall rating is based primarily on their performance in the Walker County AA.

By loan products, small business loans received more weight than home mortgage loans. Small farm loans received the least weight of the three products. FNB is not a significant small farm lender. Multi-family loans were not analyzed. FNB originated a nominal number of multi-family loans during this evaluation period therefore an analysis would be meaningless.

In terms of home mortgage loan products, refinance and home purchase loans received the most weight followed by home improvement loans. This weighting is reflective of FNB's lending performance during the evaluation period and its overall lending strategy.



## **Other**

We performed one community contact in conjunction with this CRA examination. The type of organization contacted included an Economic Development organization. No credit needs were identified as a result of the contact. However, based on previous contacts made, affordable and decent housing and small business financing were identified as credit needs in the community.

Based on information reviewed during this examination, the opportunity to make community development loans, investments and to provide community development services is somewhat limited. FNB's AA is very rural and the nearest metropolitan area is approximately 50 miles away. There is one Community Development Corporation (CDC) and no Small Business Investment Corporations (SBICs) or Community Development Financial Institutions (CDFIs) that operate in the AA. However, there are a few grass-root organizations in the AA that provide some community development activities.

## **Fair Lending Review**

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

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

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

FNB's performance under the lending test is rated "Outstanding." Based on full-scope reviews, FNB's performance in the Walker County AA is excellent.

#### **Lending Activity**

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

Overall, FNB's lending activity reflects an excellent responsiveness to meeting the credit needs of the AA.

As of June 30, 2003, FNB ranked number 1 in deposits in Walker County with a 47.9 percent market share. There are 10 financial institutions with banking offices throughout the county. FNB is not a HMDA reporter; therefore, no market data was available for comparison purposes. In terms of small loans to businesses and farms, FNB ranked number 1 in making small loans to businesses with a market share of 43.33 percent. The number 2 ranked institution had a market share of 12.08 percent. There are 30 institutions that make small loans to businesses in the AA. In terms of making small loans to farms, FNB also ranked number 1 with a market share of 76.56 percent. The number 2 ranked institution had a market share of 12.50 percent.

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

We did not perform a geographic distribution lending analysis. FNB's AA did not contain any low or moderate-income census tracts. Therefore, a geographic distribution lending analysis would be meaningless.

#### **Lending Gap Analysis**

We evaluated FNB's lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We reviewed lending reports detailing the volume of home mortgage, small loans to businesses and small loans to farms in the AA. No unexplained conspicuous gaps were identified. FNB made home mortgage and small loans to businesses in all census tracts in its AA.

### ***Inside/Outside Ratio***

A majority of FNB's loans are originated or purchased within its AAs. Overall, 85 percent of FNB's loan originations are within its AAs. By loan product, 86 percent of home mortgage loans, 84 percent of small loans to businesses, and 90 percent of small loans to farms were inside the AA. This analysis was performed on the entire bank rather than by AA and did not include any loans originated or purchased by the mortgage company.

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

Overall, FNB's distribution of loans by income level of the borrower is excellent. The distribution of home mortgage loans is excellent. The distribution of small loans to businesses and farms is excellent.

### ***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 FNB's home mortgage loan originations and purchases.

Overall, the distribution of home mortgage loans by income level of the borrower is excellent.

FNB's distribution of *home purchase loans* is excellent. FNB's percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income borrowers residing in the AA. However, in evaluating FNB's lending performance to low-income borrowers, we considered FNB's ability to make loans to this population of borrowers. Approximately 14 percent of the families in the AA live below the poverty level. This means that approximately 71 percent of the low-income individuals in the AA live below the poverty level, which makes it difficult for them to afford and maintain a home. These factors also limit FNB's opportunities to make home improvement and refinance loans in the AA. FNB's percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income borrowers in the AA. FNB is not a HMDA reporter; therefore, no market share data is available.

FNB's distribution of *home improvement loans* is excellent. FNB's percentage of home improvement loans to low-income borrowers is near the percentage of low-income borrowers that reside in the AA. The percentage of home improvement loans to moderate-income borrowers significantly exceeds the percentage of moderate-income borrowers residing in the AA.

FNB's distribution of *refinance loans* is good. FNB's percentage of refinance loans to low-income borrowers is significantly lower than the percentage of low-income individuals in the AA. Refer to the home purchase section for factors that mitigate FNB's low performance to low-income borrowers. The percentage of refinance loans to moderate-income borrowers is near the percentage of moderate-income individuals residing in 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 FNB's origination/purchase of small loans to businesses.

FNB's distribution of making small loans to businesses is excellent. FNB's percentage of loans to small businesses is near the percentage of small businesses that are in the AA. Furthermore, FNB's market share of small loans to businesses significantly exceeds its market share of loans to all businesses. A substantial portion of FNB's loans was for amounts of \$100 thousand or less. This indicates that FNB is making an effort to meet the small loan needs of the businesses in the AA.

### ***Small Loans to Farms***

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

FNB's distribution of small loans to farms by income level is excellent. All of FNB's loan originations and/or purchases were made to small farms in the AA. This performance exceeded demographic information showing the percentage of small farms operating in the AA. In addition, FNB's small farm loan market share significantly exceeded their market share of loans to all farms (regardless of revenue size). Lastly, a substantial percentage of FNB's loans were for amounts less than \$100 thousand. This further illustrates FNB's efforts to meet the credit needs for small dollar loans to smaller farms.

### **Community Development Lending**

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate FNB'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.

During this evaluation period, FNB originated and/or purchased 29 qualified CD loans totaling \$1.1 million. The vast majority of these loans were multi-family housing projects in Walker County targeted to low- and moderate-income individuals. Also, several CD loans were participation loans with the Alabama Multi-family program that provides financing for multi-family housing projects targeted toward low- and moderate-income individuals throughout the state of AL.

The opportunities to make CD loans in the AA are limited. When this factor is considered coupled with the number and dollar amount of CD loans made during the evaluation period, FNB's performance is good. FNB's high level of CD lending had a positive impact on the bank's lending test rating.

### **Product Innovation and Flexibility**

FNB did not use any innovative or flexible products during this evaluation period. This had a neutral impact on the lending test rating.

## **INVESTMENT TEST**

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

FNB's performance under the investment test is rated "Low Satisfactory." Based on full-scope reviews, FNB's performance in the Walker County AA is adequate.

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

Given the limited opportunities to make CD investments in Walker County, FNB's level of qualified investments is adequate. During this evaluation period, FNB made 10 qualified grants and donations totaling \$71 thousand. The majority of the grants and donations were made to qualified CD organizations that provide community services or affordable housing to low- and moderate-income individuals.

## **SERVICE TEST**

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

FNB's performance under the service test is rated "High Satisfactory." Based on full-scope reviews, FNB's performance in the Walker County AA is good.

### **Retail Banking Services**

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

FNB's delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the full-scope AA.

Walker County does not have any low- or moderate-income geographies. FNB has 8 branches in the Walker County AA, of which 5 are located in upper-income tracts. These tracts are located in or near downtown Jasper. All 5 upper-income tracts are within 1-2 miles of middle-income tracts where the majority of low- and moderate-income families reside. The vast majority of FNB's branches are in relatively close proximity to each other. Furthermore, the majority of FNB's banking offices are located on the main highway where most of the retail businesses are located. This area is heavily traveled and is reasonably accessible to the individuals residing in the AA.

The other 3 bank branches are located in middle-income tracts. These tracts are located in small towns about 15-20 miles from Jasper. The tracts have a high percentage of low- and moderate-income residents (i.e. about 40%) and the branches are located in areas that are accessible to the individuals residing in the area.

FNB's record of opening and closing branches did not have an adverse effect on the delivery of retail banking services to low- and moderate-income persons. FNB did not open or close any branches during this evaluation period.

FNB offers a range of banking products and services. Its banking hours do not vary significantly from one location to another but are tailored to meet the needs of the market.

### **Community Development Services**

FNB's level of community development services is good. This assessment is based on the opportunities in the AA and the type of organizations that benefit from the services provided. Fifteen employees provide financial services to 12 CD organizations. The types of services provided include serving as Chairman, Vice President, Secretary, Treasurer, Board member, finance committee, or as a member in organizations that provide affordable housing or community services for low- or moderate-income individuals or to organizations that stabilize or revitalize low- or moderate-income areas. FNB's high level of CD services had a positive impact on their service test rating.

## 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): 01/01/2000 to 12/31/2002 Investment and Service Tests and CD Loans: 07/24/2000 to 11/17/2003	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
First National Bank of Jasper (FNB) Jasper, AL	Home mortgage loans, small loans to businesses, small loans to farms and CD loans.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Synovus Mortgage Company	Affiliate	Home Mortgage Loans
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Walker County AA	Full-Scope	

# Appendix B: Market Profiles for Full-Scope Areas

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

Walker County, AL .....B-2



**Walker County, AL**

Demographic Information for Full Scope Area: Walker County, AL						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	19	0.00	0.00	78.95	21.05	0.00
Population by Geography	67,670	0.00	0.00	73.80	26.20	0.00
Owner-Occupied Housing by Geography	20,258	0.00	0.00	73.60	26.40	0.00
Business by Geography	2,674	0.00	0.00	57.03	42.97	0.00
Farms by Geography	61	0.00	0.00	62.30	37.70	0.00
Family Distribution by Income Level	19,734	20.07	17.69	19.35	42.90	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	7,451	0.00	0.00	81.57	18.43	0.00
Median Family Income		24,084	Median Housing Value		42,876	
HUD Adjusted Median Family Income for 2002		39,300	Unemployment Rate (1990 US Census)		3.14%	
Households Below Poverty Level		18.96%				

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

Source: 1990 US Census and 2002 HUD updated MFI

FNB has one AA; Walker County in its entirety. FNB’s AA includes 19 census tracts. FNB operates 8 branches and 5 cash dispensing and 1 deposit-taking ATMs throughout the AA. Six of the eight branches are located in upper-income tracts and 2 are located in middle-income tracts.

FNB is the dominant financial institution in the AA with a deposit market share of 48 percent. Their primary competitors are Pinnacle Bank with 16.7 percent of the market share, Compass Bank with 8.89 percent of market share, and Colonial Bank with 8 percent. FNB’s primary business focus is small business lending. In terms of small business lending, FNB ranks number 1 in the AA in making small loans to businesses with a market share of 43.33 percent. The number 2 ranked institution had a market share of 12.08 percent.

Walker County is located in the north-central portion of Alabama, about 16 miles northwest of Birmingham. The city of Jasper is the largest municipality in the county and is the county seat of Walker County. The local economy is relatively diversified with more than 130 manufacturing and service industries and approximately 1,400 retail outlets located in the county. Jasper is the medical center for northwest Alabama. Walker Baptist Medical Center, a 267-bed facility, provides health care. Of the total workforce, approximately 27 percent is wholesale and retail trade, 24 percent service industries, 19 percent government, 10 percent manufacturing, 10 percent mining and construction, 6 percent transportation and public utilities, and 4 percent banking/insurance/real estate. The unemployment rate for October 2003 was 6.6 percent, which is higher than the state average of 5.9 percent.

## Appendix C: Tables of Performance Data

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### 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. FNB chose not to submit consumer data for analysis in this PE. Therefore, Table 13 was excluded from this document.

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 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.

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**Table 1. Lending Volume**

LENDING VOLUME		Geography: ALABAMA				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002						
MA/Assessment Area (2002):	% 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)	
<b>Full Review:</b>												
Walker County	100.00	1,256	63,882	2,646	192,033	141	6,432	29	1,100	4,072	263,447	100.00

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: ALABAMA				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002									
MA/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	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Walker County	413	100.00	0.00	0.00	0.00	1.69	73.60	64.65	26.40	33.66	0.00	0.00	0.00	0.00	0.00

\* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is From July 25, 2000 to November 17, 2003.

\*\*\* Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

\* Based on Peer Data is not available.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

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**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: ALABAMA				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Walker County	269	100.00	0.00	0.00	0.00	0.00	73.60	68.03	26.40	31.97	0.00	0.00	0.00	0.00	0.00

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

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: ALABAMA				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Walker County	569	100.00	0.00	0.00	0.00	1.05	73.60	59.93	26.40	39.02	0.00	0.00	0.00	0.00	0.00

\* Based on Peer Data is not available.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

\* Based on Peer Data is not available.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

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**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: ALABAMA					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography <sup>*</sup>				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% of MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans						
<b>Full Review:</b>																
Walker County	5	100.00	0.00	0.00	0.00	0.00	66.92	40.00	33.08	60.00	0.00	0.00	0.00	0.00	0.00	

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

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: ALABAMA					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography <sup>*</sup>				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans						
<b>Full Review:</b>																
Walker County	2,646	100.00	0.00	0.00	0.00	0.00	57.03	47.35	42.97	52.65	43.33	0.00	0.00	43.73	46.04	

\* Based on Peer Data is not available.

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

\*\*\* Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

\* Based on 2002 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 (2003).

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

Geographic Distribution: SMALL LOANS TO FARMS		Geography: ALABAMA					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans						
<b>Full Review:</b>																
Walker County	141	100.00	0.00	0.00	0.00	0.00	62.30	70.92	37.70	29.08	76.56	0.00	0.00	76.74	76.19	

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

Borrower Distribution: HOME PURCHASE		Geography: ALABAMA					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Walker County	413	100.00	20.07	12.96	17.69	20.54	19.35	25.43	42.90	41.08	0.00	0.00	0.00	0.00	0.00	

\* Based on 2002 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 (2003).

\* Based on Peer Data is not available.

\*\* As a percentage of loans with borrower income information available. No information was available for 0.97% of loans originated and purchased by BANK.

\*\*\* Percentage of Families is based on the 1990 Census information.

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



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**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: ALABAMA				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share <sup>*</sup>				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>					
<b>Full Review:</b>															
Walker County	269	100.00	20.07	17.84	17.69	21.56	19.35	27.14	42.90	33.46	0.00	0.00	0.00	0.00	0.00

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: ALABAMA				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share <sup>*</sup>				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>					
<b>Full Review:</b>															
Walker County	569	100.00	20.07	6.91	17.69	15.78	19.35	27.66	42.90	49.65	0.00	0.00	0.00	0.00	0.00

\* Based on Peer Data is not available.

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

\*\*\* Percentage of Families is based on the 1990 Census information.

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

\* Based on Peer Data is not available.

\*\* As a percentage of loans with borrower income information available. No information was available for 0.88% of loans originated and purchased by BANK.

\*\*\* Percentage of Families is based on the 1990 Census information.

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

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**Table11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: ALABAMA			Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 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 <sup>†</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Walker County	2,646	100.00	81.56	80.20	83.03	10.54	6.42	43.33	62.60

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: ALABAMA			Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 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 <sup>†</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Walker County	141	100.00	95.08	100.00	91.49	4.96	3.55	76.56	76.56

\* Based on 2002 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 - 2003).

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

\* Based on 2002 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 - 2003).

\*\*\*\* 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.

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**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: ALABAMA									
Evaluation Period: JULY 25, 2000 TO NOVEMBER 17, 2003									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Walker County	0	0	10	71	10	71	100.00	0	0

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: ALABAMA																	
Evaluation Period: JULY 25, 2000 TO NOVEMBER 17, 2003																	
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
<b>Full Review:</b>																	
Walker County	100.00	8	100	0.00	0.00	37.50	62.50	0	0	0	0	0	0	0.00	0.00	73.80	26.20

\* '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.

