



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

**August 12, 2002**

# **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, Suite 100  
St. Louis, MO 63103**

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

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## Overall CRA Rating

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

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

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

- Lending levels reflect good responsiveness to community credit needs.
- The bank has a good distribution of loans among individuals of different income levels.
- First National Bank (FNB) generated a number of community development loans that support affordable housing for low- and moderate-income persons. This had a positive impact on the lending test.
- The bank generated a good level of qualified investments.
- Retail delivery systems are accessible to essentially all individuals regardless of income level.
- Service hours and products offered do not vary significantly from one branch to another.
- Bank officers provide a good number of community development services.

## 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 St. Louis is an interstate bank headquartered in the heart of the downtown business district in Clayton, Missouri. As of December 31, 2001, the bank had total assets of \$1.02 billion. FNB is owned by Central Bancompany (Central), Inc., headquartered in Jefferson City, Missouri. Central is a 13-bank holding company with total assets of \$5.8 billion. During this evaluation period, FNB acquired MidAmerica Bank of St. Clair County, headquartered in O'Fallon, Illinois.

FNB operates 11 offices in the St. Louis MA and offers a full range of banking products and services. As of December 31, 2001, loans totaled \$714 million and deposits totaled \$774 million. Loans represented 70 percent of total assets. By dollar volume, the loan portfolio's distribution included real estate loans (76 percent), commercial loans (12 percent), individual loans (4 percent), and other loans (8 percent). FNB is primarily a commercial and residential real estate lender with Tier 1 capital of \$71 million as of December 31, 2001. There are no legal, financial, or other factors impeding FNB's ability to help meet the credit needs in its AA.

FNB received a satisfactory CRA rating in May 1999.

## **Scope of the Evaluation**

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

The evaluation period for the lending test was from January 1, 1999, through December 31, 2001. Lending products reviewed include small loans to businesses, community development loans, home mortgage loans, and multifamily housing loans. The bank did not originate a significant number of farm loans and this was not an identified AA credit need. As a result, we did not include farm loans in our analysis.

The evaluation period for community development investments and services was from January 1, 1999, through August 12, 2002.

### **Data Integrity**

The OCC performed a review to determine the accuracy of the bank's loan data. The review noted no significant errors and found the bank's data reliable.

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

FNB has two AAs and both are within the St. Louis MA. We combined the results of FNB's performance in each AA for analysis purposes.

### **Ratings**

The bank's overall rating is based on the results of the full-scope reviews. In evaluating performance under the lending test, greater weight was placed on lending activity and loan distribution by borrower income. The geographic distribution of loans carries less weight because there are very few LMI CTs in the AA.

We placed more weight on home purchase loans, small loans to businesses, community development loans, and multifamily housing loans. In determining how each loan type would be weighed, we considered identified community credit needs and the bank's business strategy.

### **Other**

We reviewed four prior community contacts to determine community credit and investment needs and opportunities. These contacts were with organizations that promote housing for LMI individuals and small business development. These contacts identified start-up capital for small businesses and affordable housing for LMI residents as primary credit needs. Opportunities to directly address the housing needs of LMI residents is limited due to the low number of LMI residents and the large number of financial institutions competing within the AA. However, regional public/private partnerships are providing opportunities to support housing developments throughout the broader region that includes the bank's AA.



## Fair Lending Review

An analysis of the most recent CRA public comments, consumer complaint information, HMDA, and small business and small farm lending data was performed according to the OCC's risk-based fair lending approach. Based on this analysis, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation. The latest comprehensive fair lending examination was performed in May 1999.

## Conclusions with Respect to Performance Tests

### LENDING TEST

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

The bank's performance under the lending test is rated high satisfactory. Based on full-scope reviews, the bank's performance in the combined St. Louis MA is good.

#### Lending Activity

Refer to Table 1 Lending Volume in appendix C for the facts and data used in this analysis.

Lending levels reflect good responsiveness in relation to area credit needs. Small business and home mortgage loans are essential to the local economy. As of June 30, 2001, FNB had a deposit market share of 2.03 percent, ranking eighth among 122 financial institutions in the entire St. Louis MA.

Business and home mortgage lending activity in the bank's AA is good. The bank originated 1,192 small loans to businesses totaling \$171 million and 2,102 home mortgage loans totaling \$341 million. For home purchase and home refinance lending, the bank's market share was under one percent. For home improvement lending its market share was just over one percent. The bank's highest overall market share was in multifamily housing loans with a 5.8 percent market share. The bank's overall loan-to-deposit ratio was strong at 92 percent as of December 31, 2001.

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

##### *Home Mortgage Loans*

Refer to Tables 2, 3, 4 and 5 in appendix C for the facts and data used to support this analysis.

The geographic distribution of home purchase and home improvement loans was good. FNB's percentage of home purchase and home improvement loans originated in moderate-income CTs was near the percentage of owner-occupied housing units in those CTs. The bank's market share for home improvement loans in moderate-income CTs was significantly greater than its overall market share for home improvement loans.

The bank's performance is particularly impressive given the following contextual factors. The AA contains just two low-income CTs, and less than one percent of the AA's families resides in these CTs. In addition, moderate-income CTs contain less than three percent of AA families and less than two percent of the AA's owner-occupied housing units.

The geographic distribution of multifamily loans was excellent. The percentage of multifamily loans originated in moderate-income CTs was substantially greater than the percentage of multifamily housing units in moderate-income CTs.

### ***Small Loans to Businesses***

Refer to Table 6 in appendix C for the facts and data used to support this analysis.

The geographic distribution of small loans to businesses was adequate. FNB's percentage of small loans to businesses in LMI CTs was significantly less than the percentage of businesses located in LMI CTs. FNB's market share in LMI CTs was less than its overall market share.

### **Lending Gap Analysis**

We evaluated the bank's lending distribution within the AA by reviewing management reports and regulatory reports to determine if any unexplained conspicuous gaps existed. No unexplained conspicuous gaps were identified. This had a positive impact on the bank's performance under the lending test.

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

A substantial majority of the bank's loan originations were within its AA. By loan product, 79 percent of the home mortgage loans and 76 percent of the small loans to businesses originated within the AA. This had a positive impact on the bank's performance under the lending test.

### **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 support this analysis.

FNB's distribution of loans to borrowers of different income levels is good. For home purchase loans, performance to moderate-income borrowers exceeds the demographics. For home improvement and refinance lending, performance was less than the demographics for moderate-income borrowers. The bank's performance to low-income borrowers was significantly below the demographics for all product types. However, this is not considered unreasonable given the fact that over 75 percent of AA families are classified as middle- and upper-income. Also, the median housing price is \$104 thousand and five percent of households live below the poverty level. All of these factors make it difficult to originate home loans to the small population of low- and moderate-income borrowers in the AA.

### ***Small Loans to Businesses***

Refer to Table 11 in appendix C for the facts and data used to support this analysis.

The distribution of small loans to businesses is good. FNB's percentage of small loans to small businesses (businesses with annual revenues of \$1 million or less) was lower than the percentage of small businesses within the AA. However, the bank's market share of loans to small businesses is greater than its overall market share. Also, a majority of the bank's loans originated for amounts of \$100 thousand or less.

## **Community Development Lending**

The bank generated a good level of community development (CD) loans that enhanced its overall lending performance. Refer to Table 1 Lending Volume in appendix C for the facts and data used to support this analysis. 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 multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

FNB originated three CD loans totaling \$948 thousand. These loans were made to an organization for the construction of multifamily housing for LMI individuals.

## **Product Innovation and Flexibility**

FNB offers an array of home mortgage loans with flexible terms to assist LMI borrowers in achieving home ownership. These loan programs include federal, state, and local government-sponsored programs that offer less stringent underwriting requirements, fixed interest rates, low down payments, 100 percent financing, and flexible options for closing costs. These loans are included in the totals for loans originated within the AA.

## **INVESTMENT TEST**

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

The bank's performance under the investment test is rated high satisfactory. Based on full-scope reviews, the bank's performance in the St. Louis MA is rated good. Refer to Table 14 in appendix C for the facts and data used to support this analysis.

FNB had a good level of qualified investments that were responsive to the AA's credit needs. The bank originated 22 investments totaling \$1.03 million during this evaluation period. This represents a substantial increase over the \$514 thousand remaining from prior periods. This is particularly noteworthy given the limited opportunities available within the bank's AA. The AA is predominantly a middle- and upper-income community with strong banking competition and few unmet community development investment needs or opportunities.

The major portion (by dollar) of FNB's investments was used to construct affordable low-income housing developments. In addition, the bank negotiated an arrangement with the Federal National Mortgage Association to purchase \$1 million in targeted mortgage backed securities. These securities are backed by mortgage loans made to borrowers with incomes of less than 80 percent of the AA's median income and secured by real estate located within the bank's AA. Other investments included charitable contributions to organizations that provide community development services to LMI individuals.

## **SERVICE TEST**

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

The bank's performance under the service test is rated high satisfactory. Based on a full-scope review, FNB's performance in the bank's portions of the St. Louis MA was good.

### **Retail Banking Services**

Refer to Table 15 in Appendix C for the facts and data used to support this analysis.

FNB's retail delivery systems are accessible to essentially all geographies and individuals of different income levels in its AA. The bank does not have any branch offices in LMI CTs. However, less than three percent of the AA's population lives in these tracts. The bank has 20 percent of its branches in middle-income CTs and 80 percent in upper-income CTs. These CTs contain 41 and 56 percent of the total population, respectively.

On a net basis, branch closures and openings had a positive effect on its CRA performance. The bank had a net increase of one branch in middle-income CTs. This has improved access to retail delivery systems for LMI families as 16 percent of low-income families and 20 percent of moderate-income families reside in these CTs.

Banking services and hours do not vary significantly from one branch to another.

The bank offers an on-line residential real estate loan application process. Applicants can complete the entire loan application process on-line. However, because the bank does not track how well this service reaches LMI individuals or geographies, we are unable to give this any significant weight.

### **Community Development Services**

FNB provided a good level of community development services in the AA. Bank officers regularly participate in a variety of organizations that promote affordable housing for or financial education to LMI individuals. Bank officers serve on the boards and committees of these organizations, providing financial expertise and advice.

## Appendix A: Scope of Examination

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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 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): January 1, 1999, through December 31, 2001 Investment and Service Tests and CD Loans: January 1, 1999, through August 12, 2002	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
First National Bank of St. Louis, Clayton, Missouri	Home Mortgage, Small Business, and Community Development Loans; Qualified Community Development Investments and Services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Combined St. Louis AA	Full-Scope	

# Appendix B: Market Profiles for Full-Scope Areas

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

St. Louis Combined AA .....	B-2
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St. Louis AA

Demographic Information for Full-Scope Area: St. Louis Combined AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	156	1.29	5.16	43.87	49.68	0.00
Population by Geography	967,396	0.11	2.79	40.47	56.64	0.00
Owner-Occupied Housing by Geography	269,029	0.04	1.61	40.14	58.20	0.00
Businesses by Geography	44,375	0.11	2.83	39.31	67.50	0.00
Farms by Geography	1,456	0.00	0.82	56.52	42.65	0.00
Family Distribution by Income Level	264,938	10.77	14.03	23.49	51.71	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	65,697	0.28	5.81	58.29	35.52	0.00
Median Family Income = \$37,995		Median Housing Value = \$103,460				
HUD Adjusted Median Family Income for 2001 = \$57,028		Unemployment Rate = 2.12%				
Households Below the Poverty Level = 5.16%						

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

FNB has two AAs, both within the St. Louis MA. The bank’s largest AA contains 135 CTs and consists of the Missouri counties of St. Charles and Warren along with portions of St. Louis County. The Illinois AA includes 21 contiguous CTs in the northeastern portion of St. Clair County. Because both AAs are within the same MA, they were combined for analysis purposes. The combined AA contains a total of 156 CTs; two are low-income, eight (5 percent) moderate-income, 68 (44 percent) middle-income, and 77 (50 percent) are upper-income. The AA meets the requirements of the CRA and does not arbitrarily exclude any LMI areas.

The local economy is stable and the unemployment rate is below the national average. The largest industries/employers are services and retail. Numerous commercial banks (including interstate banks), savings institutions and mortgage companies provide strong competition in the AA. Primary competitors include US Bank, Bank of America, Commerce Bank, First Bank, and UMB Bank.



## 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.

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

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

also presents market share information based on the most recent aggregate market data available.

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

Market share information is presented based on the most recent aggregate market data available.

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

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

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

## Table 1. Lending Volume

LENDING VOLUME		Geography: ST. LOUIS COMBINED AA						Evaluation Period: January 1, 1999 to December 31, 2001				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
St. Louis Combined AA	100.00	2,102	341,196	1,192	171,100	3	142	3	948	3,297	512,438	100.00

\* Loan Data as of December 31, 2001. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is January 1, 1999, to December 31, 2001.

\*\*\* Deposit Data as of June 30, 2001. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

## Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: ST. LOUIS COMBINED AA						Evaluation Period: January 1, 1999 to December 31, 2001							
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	Over all	Low	Mod	Mid	Upp
St. Louis Combined AA	1,144	100.00	0.04	0.00	1.61	1.14	40.14	26.05	58.20	72.81	0.48	0.00	0.28	0.33	0.54

\* Based on 2000 Peer Mortgage Data: Midwestern Region.

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

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

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

Geographic Distribution: HOME IMPROVEMENT		Geography: ST. LOUIS COMBINED AA								Evaluation Period: January 1, 1999 to December 31, 2001					
MA/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
St. Louis Combined AA	166	100.00	0.04	0.00	1.61	1.20	40.14	13.25	58.20	85.54	1.16	0.00	3.51	0.25	1.56

\* Based on 2000 Peer Mortgage Data: Midwestern Region.

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

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: ST. LOUIS COMBINED Evaluation Period: January 1, 1999 to December 31, 2001													
MA/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
St. Louis Combined AA	778	100.00	0.04	0.00	1.61	0.13	40.14	22.62	58.20	77.25	0.20	0.00	0.40	0.22	0.19

\* Based on 2000 Peer Mortgage Data: Midwestern Region.

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

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

## Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: ST. LOUIS COMBINED AA						Evaluation Period: January 1, 1999 to December 31, 2001							
MA/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
St. Louis Combined AA	14	100.00	0.16	0.00	3.73	7.14	42.19	50.00	53.92	42.86	5.77	0.00	0.00	2.00	10.00

\* Based on 2000 Peer Mortgage Data: Midwestern Region.

\*\* 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.



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

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: ST. LOUIS COMBINED AA				Evaluation Period: January 1, 1999 to December 31, 2001									
MA/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 Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
St. Louis Combined	1,192	100.00	0.11	0.00	2.83	1.34	39.31	28.94	57.75	69.71	1.51	0.00	0.53	1.07	2.06

\* Based on 2000 Peer Small Business Data: US.

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

\*\*\* Source Data - Dun and Bradstreet (2001).

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

Geographic Distribution: SMALL LOANS TO FARMS		Geography: ST. LOUIS COMBINED AA				Evaluation Period: January 1, 1999 to December 31, 2001									
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
St. Louis Combined AA	3	100.00	0.00	0.00	0.82	0.00	56.62	33.33	42.65	66.67	1.99	0.00	0.00	0.93	5.00

\* Based on 2000 Peer Small Business Data: US.

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

\*\*\* Source Data - Dun and Bradstreet (2001).

## Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: ST. LOUIS COMBINED AA						Evaluation Period: January 1, 1999 to December 31, 2001							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp
St. Louis Combined AA	1,144	100.00	10.77	4.55	14.03	15.29	23.49	20.84	51.71	59.33	0.45	0.33	0.26	0.28	0.65

\* Based on 2000 Peer Mortgage Data: Midwestern Region.

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

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

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

## Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: ST. LOUIS COMBINED AA						Evaluation Period: January 1, 1999 to December 31, 2001						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families* **	% BANK Loans <sup>****</sup>	% Families* **	% BANK Loans <sup>****</sup>	% Families* **	% BANK Loans <sup>****</sup>	Over all	Low	Mod	Mid	Upp
St. Louis Combined AA	166	100.00	10.77	3.85	14.03	5.77	23.49	18.59	51.71	71.79	1.16	0.64	0.91	0.31	1.84

\* Based on 2000 Peer Mortgage Data: Midwestern Region.

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

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

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: ST. LOUIS COMBINED AA						Evaluation Period: January 1, 1999 to December 31, 2001							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
St. Louis Combined AA	3.72	100.00	10.77	3.72	14.03	9.57	23.49	23.27	51.71	63.43	0.23	0.24	0.10	0.15	0.31

\* Based on 2000] Peer Mortgage Data: Midwestern Region.

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

\*\*\* 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.

## Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: ST. LOUIS COMBINED AA			Evaluation Period: January 1, 1999 to December 31, 2001				
	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
MA/Assessment Area:									
St. Louis Combined AA	1,192	100.00	84.18	59.82	64.68	19.46	15.86	1.51	2.44

\* Based on 2000 Peer Small Business Data: US.

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

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

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

## Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS					Geography: ST. LOUIS COMBINED AA		Evaluation Period: January 1, 1999 to December 31, 2001		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
St. Louis Combined AA	3	100.00	92.58	100.00	66.67	33.33	0.00	1.99	2.34

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\* Based on 2000 Peer Small Business Data: US.

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

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

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

## Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: ST. LOUIS COMBINED AA				EValuation Period: January 1, 1999 to August 12, 2002			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
St. Louis Combined AA	1	514	22	1,029	23	1,543	100.00	1	486

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

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



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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: COMBINED AA Evaluation Period: January 1, 1999 to December 31, 2001																	
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>																	
	100.00	10	100.00	0.00	0.00	20.00	80.00	2	1	0	0	+1	0	0.11	2.79	40.47	56.64

