



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

November 08, 2007

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Jasper
Charter Number: 7746

200 - 18th Street West
Jasper, AL 35501

Office of the Comptroller of the Currency

Midsized Banks
440 South LaSalle Street, Suite 2700
Chicago, IL 60605

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** with respect to the Lending, Investment, and Service Tests:

Performance Levels	The First National Bank of Jasper Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		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 lending levels reflect excellent responsiveness to meeting the credit needs of the assessment area (AA).
- Overall, FNB’s geographic distribution of loans is good.
- A majority of the bank’s loans are originated within its AA.
- The overall distribution of loans by income level of the borrower is good.
- FNB’s dollar amount of investments in the AA is adequate given the available community development (CD) opportunities in the AA.
- FNB’s delivery systems are accessible to geographies and individuals of different income levels throughout the full-scope AA.

Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Description of Institution

The First National Bank of Jasper (FNB) is an intrastate financial institution headquartered in Jasper, AL. The bank's primary service area is Walker County, AL which is part of the Birmingham-Hoover MSA. FNB operates 8 branches and 6 ATMs (5 cash dispensing and 1 deposit-taking) throughout the AA.

FNB is a subsidiary of Synovus Financial Corp. (SFC). SFC is a \$34 billion diversified financial services company headquartered in Columbus, GA. SFC operates 37 banks in Alabama, Florida, Georgia, South Carolina, and Tennessee. In addition to banking, SFC offers financial management, insurance, mortgage, leasing, and electronic payment services through its subsidiaries.

As of September 30, 2007, FNB had total assets of \$549 million. The major categories of the bank's \$383 million loan portfolio were as follows: 40 percent commercial and industrial, including non-farm non-residential real estate; 25 percent construction; 21 percent 1-4 family residential; 7 percent consumer and 7 percent other. Agricultural loans represent less than 1 percent of total loans. The percent of the bank's total assets represented by net loans is 70 percent. FNB's Tier One Risk Based Capital to Risk Weighted Assets equals 9.94 percent and Tier One Capital totals \$44.2 million.

FNB is primarily a commercial lender and offers a full range of traditional banking products and services. On a smaller scale, the bank offers consumer and mortgage loans through various programs. Small farm lending is not a significant product for FNB. The bank does not operate any subsidiaries.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its assessment areas. The bank's rating at its preceding CRA examination, dated November 17, 2003, was "Satisfactory".

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation assesses the bank's performance under the Lending, Investment, and Service Tests. Although qualified by asset size to be evaluated under Intermediate Small Bank exam procedures, FNB bank elected to be evaluated under the Large Bank Test. In evaluating the bank's lending performance, we reviewed residential mortgage loans subject to filing under HMDA, and small loans to businesses. We did not evaluate the bank's lending performance with regard to small loans to farms. The bank originated only 106 small loans to farms compared to 3,485 small loans to businesses during the evaluation period.

With the exception of CD loans, the evaluation period for the Lending Test is January 1, 2003 through December 31, 2006. Tables of Performance Data represent loans originated during the period January 1, 2004 through December 31, 2006. Loans originated during 2003 are not represented in the PE in table format and were analyzed separately from loans originated during calendar years 2004, 2005, and 2006 because of changes in the demographics of the assessment area identified as a result of the 2000 U.S. Census. An analysis of 2003 loan data was compared to 2000 U.S. Census data using the corresponding Metropolitan Statistical Area (MSA) designations. The Office of Management and Budget published updated MSA designations for use beginning in 2004. Therefore, analyses of 2004, 2005 and 2006 loan data was compared to the 2000 U.S. Census data using the updated MSA configurations. Performance for 2003 is discussed only if it is inconsistent with performance in 2004-2006. Refer to comments under the lending test regarding 2003 performance.

For CD loans, the Investment Test, and the Services Test, the evaluation period is November 18, 2003, through November 8, 2007.

Data Integrity

Prior to this examination, we tested the accuracy of FNB's HMDA and CRA (small loans to businesses and farms) loan data. We found that the bank's HMDA data was accurate and reliable. We found the publicly reported CRA data inaccurate with respect to gross annual revenue (GAR) codes. The bank made subsequent changes to correct the errors and placed the corrected data in its public file. This evaluation is based on accurate data. Bank underwriting practices do not require consideration of GAR in the credit approval process. The bank is therefore not required to collect GAR. GAR data will not be used in this analysis. Tables reflecting loans to businesses with revenues of less than and greater than \$1 million dollars are omitted. Conclusions related to the distribution of loans by borrower income will be limited to loans reported under HMDA.

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

Selection of Areas for Full-Scope Review

The Walker County AA received a full-scope review. Walker County is the bank's only AA.

Refer to the table in Appendix A for more information.

Ratings

The bank's overall rating is based on that area that received a full-scope review.

In evaluating the bank's lending performance, more weight was placed on small loans to businesses than on HMDA loans. In terms of individual HMDA products, home improvement loans received the least weight. This weighting is reflective of the bank's business strategy and lending performance during the evaluation period.

More weight was placed on loans originated during calendar years 2004, 2005 and 2006 than on loans originated during 2003. Loans originated between January 1, 2004 and December 31, 2006 represent a majority of loans originated during the evaluation period. These were evaluated using demographic data from the 2000 census and reflect current lending practices. Demographic data from the 2000 census was used to evaluate performance for loans originated during 2003.

Other

We reviewed two community contacts conducted by the OCC in the last 18 months. One of the organizations contacted supports development and maintenance of affordable housing in central Alabama. The other provides services and resources, including loans and counseling, for women entrepreneurs. Identified needs included borrower education and micro loans for business start-ups and bank involvement in small SBA loan programs.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST-

The bank's performance under the lending test is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Walker County AA is good.

Lending Activity

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

We considered that about one-third of the bank's mortgage lending is conducted through an affiliate, Synovus Mortgage Corp. (SMC). The affiliate loans are not considered in this evaluation.

We also considered that a high rate of poverty diminishes the bank's ability to lend to low-income individuals and families. Eighteen percent of the households in the AA live below the poverty level. A low-income family earns less than \$27,750 making it difficult to finance and own a home.

Lending levels reflect excellent responsiveness to meeting the credit needs of the AA. As of June 30, 2006 FNB ranked first in deposits in the AA with a 47.83 percent market share. There are 11 financial institutions with banking offices throughout the AA. Based on 2006 aggregate market data, FNB ranked first out of 33 CRA reporters in the AA in making small loans to businesses with a 40.57 percent market share. Based on 2006 HMDA aggregate data, FNB had a market share of 7.42 percent and ranked first of 198 HMDA reporters in the AA in the overall volume of HMDA lending. For home purchase loans, FNB ranked first of 141 HMDA lenders with an 8.84 market share. For home improvement loans, FNB ranked fourth of 49 lenders, with a 6.30 market share. For home refinance loans, FNB ranked first of 147 lenders with a 6.45 market share.

Distribution of Loans by Income Level of the Geography

Overall, FNB's geographic distribution of loans is good. The bank's distribution of HMDA loans is good. The geographic distribution of small loans to businesses is good.

Multi-family loans were not reviewed during this evaluation period. The bank originated and purchased a minimal number of multi-family loans. As a result, an analysis would not be meaningful.

Home Mortgage Loans

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

Overall, the geographic distribution of HMDA loans is good.

The geographic distribution of *home purchase loans* is good. The percent of home purchase loans in moderate-income tracts approximates the percent of owner-occupied units in moderate-income tracts. The bank's market share of loans in moderate-income tracts exceeds its overall market share.

The geographic distribution of *home improvement loans* is excellent. The bank's percent of home improvement loans in moderate-income tracts exceeds the percent of owner-occupied units in these tracts. The bank market share of loans in moderate-income tracts exceeds its overall market share.

The overall geographic distribution of *refinance loans* is good. The bank's percent of refinance loans in moderate-income tracts is near the percent of owner-occupied units in moderate-income tracts. The bank's market share in moderate-income tracts exceeds its overall market share.

Small Loans to Businesses

Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The bank's geographic distribution of small loans to businesses is good. The bank's percent of loans in moderate-income tracts is near the percentage of businesses located in moderate-income tracts. The bank's market share in moderate-income tracts exceeds its overall market share.

Lending Gap Analysis

We evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We reviewed lending reports and maps detailing the volume of HMDA and small loans to businesses in moderate-income geographies. No unexplained conspicuous gaps were identified. This performance had a positive effect on the bank's overall geographic distribution analysis.

Inside/Outside Ratio

A majority of the bank's loans are originated within its AA. Overall, 80.91 percent of FNB's loan originations are within their AA. By loan product, 81.43 percent of HMDA loans, and 80.69 percent of small loans to businesses were inside the AA. This performance had a positive effect on the bank's overall geographic distribution analysis.

Distribution of Loans by Income Level of the Borrower

Overall, the distribution of loans by income level of the borrower is good.

Home Mortgage Loans

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

The distribution of HMDA loans by borrower income is good.

The overall distribution of *home purchase loans* is excellent. The bank's percent of home purchase loans to low-income borrowers is below the percent of low-income families that live in the AA, but is excellent when considering the high rate of poverty discussed above. The bank's percent of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families that live in the AA. The bank's market share of loans to low-income borrowers exceeds its overall market share. The bank's market share of loans to moderate-income borrowers is near its overall market share. Performance in 2003 is weaker than performance in the 2004-2006 period.

The overall distribution of *home improvement loans* is good. The bank's percent of home improvement loans to low-income borrowers is below the percent of low-income families that live in the AA, but is excellent when considering the high rate of poverty discussed above. The bank's percent of loans to moderate-income borrowers exceeds the percent of moderate-income families that live in the AA. The bank's market share of loans to low-income borrowers is significantly below its overall market share. The bank's market share to moderate-income borrowers is well below its overall market share.

The overall distribution of *refinance loans* is good. The bank's percent of refinance loans to low-income borrowers is well below the percent of low-income families that live in the AA, but is good when considering the high rate of poverty discussed above. The bank's percent of refinance loans to moderate-income borrowers exceeds the percent of moderate-income families that live in the AA. The bank's market share of loans to low-income borrower exceeds their overall market share. The market share to moderate-income borrowers is below its overall market share.

Community Development Lending

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

During this evaluation period, FNB originated four community development loans totaling \$59.4 thousand. All four loans were originated under a special program to develop affordable housing in the bank's AA. This had a neutral impact on the 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

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

The bank's performance under the Investment Test is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Walker County AA is adequate.

FNB's level of qualified investments is adequate. The AA is predominantly rural. Opportunities to make investments in qualified community development programs or projects are very limited. Opportunities are further limited by competition from local, regional and national banks doing business in the AA. During this evaluation period, FNB made 46 qualified grants and donations totaling \$356 thousand. The majority of the grants and donations were made to organizations that provide community services or affordable housing for low- and moderate-income 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, the bank'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 the bank's branch delivery system and branch openings and closings.

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

FNB has 8 branches in the Walker County AA. Three are located in moderate-income tracts and five are in middle-income tracts. Walker County has no low- or upper-income geographies. Two of the five branches located in middle-income tracts have physical locations that border moderate-income tracts. Branches are located on primary roadways where the majority of retail businesses in the AA are located. These areas are heavily traveled and are accessible to families and individuals residing in the AA.

FNB's record of opening and closing branches did not have an adverse affect 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 types of organizations that benefit from the services provided. Sixteen employees provided financial services to 33 community development organizations. The types of services provided include serving as Chairman, Vice President, Secretary, Treasurer, Board member, on finance committees, or as a member in organizations that provide affordable housing, services to low- and moderate-income families, revitalization of low- and moderate-income geographies, and support small business development. FNB's high level of CD services received positive consideration in evaluating performance under the Service Test.

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 nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): 1/1/2003 – 12/31/2006 Investment and Service Tests and CD Loans: 11/18/2003 – 11/8/2007	
Financial Institution	Products Reviewed	
First National Bank of Jasper	Residential mortgage loans Loans to businesses and farms Community development loans	
Affiliate(s)	Affiliate Relationship	Affiliate(s)
None		None
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Assessment Area
Walker County, AL	Full-scope	Walker County, AL

Appendix B: Market Profiles for Full-Scope Areas

Walker County

Demographic Information for Full-Scope Area: Walker County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	18	0.00	72.22	27.78	0.00	0.00
Population by Geography	70,713	0.00	67.60	32.40	0.00	0.00
Owner-Occupied Housing by Geography	22,693	0.00	67.83	32.17	0.00	0.00
Business by Geography	4,375	0.00	60.69	39.31	0.00	0.00
Farms by Geography	74	0.00	59.46	40.54	0.00	0.00
Family Distribution by Income Level	20,515	30.91	21.63	20.17	27.29	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	10,779	0.00	73.36	26.64	0.00	0.00
Median Family Income		46,408	Median Housing Value		57,492	
HUD Adjusted Median Family Income for 2007		55,500	Unemployment Rate (2000 US Census)		2.72%	
Households Below Poverty Level		18%				

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

Source: 2000 US Census and 2007 HUD updated MFI

FNB has 8 branches and 6 ATMs in the Walker County AA. The AA includes Walker County in its entirety. The county is part of the Birmingham-Hoover MSA which is located in the north-central area of the state known as Greater Birmingham. FNB's AA has 18 census tracts consisting of 13 moderate- and 5 middle-income tracts. The bank's AA does not arbitrarily exclude any geography, particularly low- or moderate-income, and complies with the technical requirements of the CRA regulation.

As of June 30, 2007, FNB is ranked first in the AA with a 47.8 percent deposit market share. The financial institutions ranked second and third have a combined deposit market share of 22.24 percent with 5 banking offices. Competition in this AA is moderate. There are 11 financial institutions with 25 banking offices in the area. Major competitors include large regional and national institutions.

Walker County is located in the north-central portion of AL, about 16 miles north of Birmingham. The City of Jasper is the largest municipality and county seat of Walker County. Walker Baptist Medical Center, a 267-bed acute care facility is located in Jasper. The local economy is diversified with manufacturing, service industries, and retail outlets. Of the total workforce, approximately 19 percent is educational, health, and social services. Another 15 percent is retail trade, and 14 percent is manufacturing. The top five employers in the AA are Walker Baptist Medical Center, Beville State College, Marshall Durbin, Wal-Mart and Alabama Power Company.

The unemployment rate for Walker County was 4.1 percent as of July 2007, equal to the state average of 4.1 percent for the same period. The 2004 poverty rate for Walker County was 16.2 percent compared to 16.1 percent for the state of Alabama.

Refer to the Scope of the Evaluation section of the Performance Evaluation for additional information on the identified credit needs and the community development lending, investment, and service opportunities in this AA.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

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

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

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

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

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

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

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF ALABAMA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006				
MA/Assessment Area (2007):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Walker Co AL	100.00	878	38,818	2,712	199,263	78	3,657	4	59	3,672	241,797	100.00

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF ALABAMA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006							
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
Full Review:															
Walker Co AL	396	100.00	0.00	0.00	67.83	67.17	32.17	32.83	0.00	0.00	8.84	0.00	9.98	7.12	0.00

* Loan Data as of December 31, 2006. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from November 13, 2003 to November 05, 2007.

*** Deposit Data as of June 30, 2007. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**** Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF ALABAMA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006						
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Walker Co AL	109	100.00	0.00	0.00	67.83	68.81	32.17	31.19	0.00	0.00	6.30	0.00	7.36	4.00	0.00

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF ALABAMA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006						
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Walker Co AL	364	100.00	0.00	0.00	67.83	60.16	32.17	39.84	0.00	0.00	6.45	0.00	6.99	5.67	0.00

^{*} Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

^{*} Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: STATE OF ALABAMA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006						
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
Full Review:															
Walker Co AL	2,712	100.00	0.00	0.00	60.69	51.36	39.31	48.64	0.00	0.00	40.57	0.00	43.43	42.47	0.00

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: STATE OF ALABAMA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006						
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 ¹	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Walker Co AL	396	100.00	30.91	17.78	21.63	27.58	20.17	25.52	27.29	29.12	8.84	9.63	8.51	10.96	9.03

* Based on 2006 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 (2006).

**** Based on 2006 Peer Mortgage Data (Eastern)

***** As a percentage of loans with borrower income information available. No information was available for 2.0% of loans originated and purchased by bank.

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

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT DECEMBER 31, 2006			Geography: STATE OF ALABAMA								Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ²	% BANK Loans ^{****}	% Families [*] ^{**}	% BANK Loans ^{****}	% Families [*] ^{**}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
Walker Co AL	109	100.00	30.91	18.69	21.63	27.10	20.17	29.91	27.29	24.30	6.30	2.88	4.27	3.08	9.32

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF ALABAMA								Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006				
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 ³	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
Walker Co AL	364	100.00	30.91	14.86	21.63	23.43	20.17	29.71	27.29	32.00	6.45	8.54	5.31	6.90	6.46

Table 14. Qualified Investments

QUALIFIED INVESTMENTS	Geography: STATE OF ALABAMA	Evaluation Period: NOVEMBER 18, 2003 TO NOVEMBER 5, 2007
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^{*} Based on 2006 Peer Mortgage Data (Eastern)

^{**} As a percentage of loans with borrower income information available. No information was available for 1.8% of loans originated and purchased by bank.

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

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

^{*} Based on 2006 Peer Mortgage Data (Eastern)

^{**} As a percentage of loans with borrower income information available. No information was available for 3.8% of loans originated and purchased by bank.

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

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

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

MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Walker Co AL	0	0	46	356	46	356	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: STATE OF ALABAMA Evaluation Period: NOVEMBER 18, 2003 TO NOVEMBER 5, 2007																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Walker Co AL	100.00	8	100.00	0.00	37.50	62.50	0.00	0	0	0	0	0	0	0.00	67.60	32.40	0.00

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

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