



SMALL BANK

Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

PUBLIC DISCLOSURE

January 9, 2006

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Old Missouri National Bank
Charter Number 23881**

**3570 South National
Springfield, Missouri 65807**

**Comptroller of the Currency
Kansas City South Field Office
1710 East 32nd Street, Suite H
Joplin, Missouri 64804**

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, nor should it 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.

INSTITUTION'S COMMUNITY REINVESTMENT ACT (CRA) RATING:

This institution is rated Satisfactory.

Old Missouri National Bank's (OMNB) average quarterly loan-to-deposit ratio since the last examination is excellent.

- The bank's loan-to-deposit (LTD) ratio reflects more than reasonable responsiveness to the credit needs of the assessment area (AA). The bank's quarterly average LTD ratio since the last CRA examination was 100.96% based on the last 17 quarters. This is the second highest average LTD ratio of the five similarly situated banks in the AA and noticeably above the group average of 94.71%.

OMNB has an outstanding record of lending to borrowers of different income levels.

- Lending to borrowers of different incomes and small businesses is outstanding. The distribution of loans, given the demographics of the AA, reflects more than reasonable penetration among individuals of different income levels, as well as businesses of different sizes. Examiners reviewed a sample of at least 20 loans for each of the bank's primary product types originated in the AA since the previous CRA examination through December 2005. Our sample of residential real estate loans included all loans reported on the bank's Home Mortgage Disclosure Act Loan Application Registers for 2004 and 2005.

Performance for consumer lending to low-and moderate-income individuals is more than reasonable given the demographics. Based on the sample of 20 consumer loans, 15% by number and 13% by dollar were made to low-income borrowers, while 25% by number and 23% by dollar were made to moderate-income borrowers. Demographic data from the 2000 census indicates 22% and 17% of households in the AA are designated low- and moderate-income, respectively. And 12% of the households in the AA are below poverty level.

OMNB's lending for commercial loans is excellent. Based on the sample of 20 commercial loans, 85% by number and 86% by dollar were made to small businesses (revenues less than \$1 million). Demographic data for 2005 indicates 63% of the businesses in the AA have revenues less than \$1 million.

Lending performance for residential real estate loans is reasonable given the demographics. Based on a sample of 72 loans, 7% by number and 6% by dollar were made to low-income borrowers, while 19% by number and 12% by dollar were made to moderate-income borrowers. Demographic data from the 2000 census indicates 17% and 19% of families in the AA are designated low- and moderate-income, respectively, and 8.04% of the families in the AA are below poverty level.

OMNB's geographic distribution of loans within the assessment area is satisfactory.

- Although the bank's geographic distribution of credit reflects little penetration into low- and moderate-income census tracts, the bank's performance is reasonable. Neither of OMNB's two branches is located in any of the low- or moderate- income census tracts, which are confined to the Springfield city limits. This area represents only a fraction of the bank's overall AA that covers the four county region surrounding Springfield. In general, loans in the city, including loans in the low- and moderate-income census tracts, have been limited by Springfield's very competitive banking environment. There are 23 banks with 93 banking offices located in the city of Springfield. In our sample of loans originated in the bank's AA, approximately 70% were originated outside the Springfield city limits.

Lending to moderate-income census tracts is reasonable. However, our samples for commercial/industrial and consumer installment loans did not identify any loans in moderate-income census tracts. Our sample of residential real estate loans revealed 4% by number and 1% by dollar were originated in moderate-income census tracts. These results are considered satisfactory given the above mitigating factors. Demographics from the 2000 census and 2005 business data indicate that 14% of businesses, 16% of households, and 12% of owner occupied housing are located in moderate-income tracts.

Lending in the low-income census tracts is reasonable. However, our samples for commercial/industrial and consumer installment loans did not identify any loans in low-income census tracts. Our sample of residential real estate loans revealed that 1% by number and dollar were originated in the low-income census tracts. These results are considered satisfactory based upon the mitigating factors stated above and the fact that only 3% of businesses, 1% of households and 0.04% of owner occupied housing are located in the AA's low-income census tracts.

OMNB originated a majority of its loans in its assessment area.

- The bank's record of lending within its AA is satisfactory. For consumer, commercial and residential real estate loans sampled, the bank originated 71% by number and 68% by dollar amount within its AA.

OMNB did not receive any complaints about its performance in helping to meet credit needs in the assessment area during the evaluation period.

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

DESCRIPTION OF INSTITUTION

OMNB is an \$85 million institution located in Springfield, Missouri owned by JamesMark Bancshares, Inc, a one-bank holding company. The bank is headquartered and operates two full service facilities, including ATMs, in Springfield. Consumer installment, commercial/industrial, and residential real estate loans are the primary focuses of the bank's loan portfolio.

OMNB received a “Satisfactory” CRA rating at the last examination dated August 13, 2001. There are no legal or financial factors that impede the bank’s ability to help meet the credit needs of the AA.

DESCRIPTION OF ASSESSMENT AREA

OMNB’s AA includes all of Christian, Greene, Lawrence, and Webster counties in Missouri. The AA contains two low-, fifteen moderate-, forty-six middle-, and twenty-one upper-income census tracts. The low- and moderate-income tracts are all located in northern Springfield, Greene County, Missouri. The AA meets the requirements of the regulation, as the census tracts are contiguous, include geographies where the bank, all branches, and ATMs are located, and where a substantial majority of the bank’s loans are originated. There are forty-three banks with 164 banking offices within the AA. While the AA is located within the Springfield Metropolitan Statistical Area (MSA), the AA does not include the two most northern counties of the MSA, as the bank cannot reasonably serve these areas from its current locations.

We made one community contact during this examination, which indicated all financial institutions in the area assist in meeting the primary credit needs of the surrounding communities.

Please refer to the bank’s CRA Public File for more information.