

PUBLIC DISCLOSURE

November 1, 1999

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**First Bankers Trust Company, N.A.
Charter Number #14564
1201 Broadway Street
Quincy, Illinois 62305**

**Office of the Comptroller of the Currency
Peoria Field Office
111 West Washington Street, Suite 300
East Peoria, Illinois 61611**

NOTE: 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.

GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the CRA performance of **First Bankers Trust Company, N.A (FBT)** prepared by the **Office of the Comptroller of the Currency**, the institution's supervisory agency, as of **November 1, 1999**. This evaluation is based on information from the last CRA examination dated August 23, 1996 to the current examination dated November 1, 1999. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

INSTITUTION'S CRA RATING: This institution is rated A Satisfactory. @

- C A majority of FBT's loan originations are located within the bank's assessment area.
- C The bank's distribution of lending to borrowers of different income levels, including low- and moderate-income individuals, is reasonable.
- C FBT's record of lending to small farms and small businesses within its assessment area is good.

DESCRIPTION OF INSTITUTION

First Bankers Trust Company, N.A., (FBT) is a \$247 million bank in Quincy, Illinois. The main bank, located in downtown Quincy, has a drive-up facility and an Automated Teller Machine (ATM). The bank has three other branches in Quincy with drive-up facilities and ATMs. There is a full-service branch and drive-up in Mendon, Illinois, approximately 20 miles north of Quincy, and three additional ATMs located in the AA. The main bank office is in an upper-income Block Numbering Area (BNA), but is adjacent to a low- and several moderate-income BNAs.

FBT is wholly owned by First Bankers Trustshares, Inc., a one bank holding company. The bank offers traditional banking services and lending products. Their primary business focus is commercial and residential real estate lending. The loan portfolio mix is as follows: commercial 44%; residential real estate 30%; instalment 18%, and agricultural 8%.

There are no financial conditions, legal constraints, or other factors that hinder the bank's ability to help meet the credit needs of its assessment area (AA). A Satisfactory rating was received during the August 23, 1996, CRA examination.

DESCRIPTION OF ASSESSMENT AREA:

The bank's AA consists of 17 BNAs within the western half of Adams County, which is located in West Central Illinois. One (6%) of the BNAs in the AA is designated as low-income; four (23%) as moderate-income; nine (53%) as middle-income, and three (18%) as upper-income. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies. The location of the BNAs by income level is as follows:

- C Low-income: 7
- C Moderate-income: 3, 4, 5, 8
- C Middle-income: 1, 2.01, 2.02, 9, 10.01, 10.02, 101, 104, 106
- C Upper-income: 6, 11, 105

According to 1990 census data, the total population of the bank's AA is 56,687. The 1999 non-Metropolitan Statistical Area (MSA) statewide median family income for Illinois is \$41,500. Potential borrowers earning less than 50% of the non-MSA statewide median family income are designated as low-income, while those earning 50% - 80%, 80% - 120%, and more than 120% are designated as moderate-, middle-, and upper-income, respectively. Within the AA, 19% of the families are low-income; 19% are moderate-income; 23% are middle-income, and 39% are upper-income. Fourteen percent of the population is below poverty level.

There are 24,180 total housing units in the AA, of which 64% are owner-occupied, 28% are rental-occupied and 8% are vacant. The median age of homes in the AA is 47 years; the median housing price is \$44,866.

Economic Data

The economy of the AA is based on manufacturing, agriculture, retail/wholesale and professional services. Economic conditions in the AA are stable. Major employers include: Blessing Hospital, Quincy Public Schools, Glenayre Electronics and ADM. The unemployment rate for the AA is low at 3%.

Ninety percent of the businesses in the AA have gross income of less than \$1million with 10% greater than \$1 million. Ninety-six percent of the farms have revenues less than \$1 million.

The large number of banks, thrift institutions, credit unions and Farm Credit services provide a strong level of competition in the financial services market. First State Bank of Western Illinois, Farmers State Bank and State Street Bank and Trust Company were identified as similarly situated institutions in surrounding counties based on asset size.

A community contact was made with a representative from an area economic development group. The contact indicated local financial institutions are responsive to community credit needs and there are no significant unmet credit needs in the community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA:

LOAN-TO-DEPOSIT RATIO

The bank's loan-to-deposit ratio meets the standards for satisfactory performance. The average loan-to-deposit ratio for the 12 quarters ending June 30, 1999 equals 72.55% compared to 71.88% for similarly situated banks.

LENDING IN ASSESSMENT AREA

The bank's record of lending within the AA is reasonable and meets the standards for satisfactory performance. The following table details the bank's lending within and outside the AA by dollar volume and number of loan originations in the evaluation period.

LOAN TYPE	DOLLAR VOLUME		NUMBER OF LOANS	
	WITHIN AA	OUTSIDE AA	WITHIN AA	OUTSIDE AA
Residential Real Estate	\$37,449,305	\$6,213,599	716	126
	86%	14%	85%	15%
Business	\$66,807,979	\$15,591,483	477	72
	81%	19%	87%	13%
Agricultural	\$9,957,904	\$6,638,650	324	107
	60%	40%	75%	25%
Consumer Instalment	\$22,671,675	\$14,056,566	2,310	1,305
	62%	38%	64%	36%
TOTAL	\$136,886,863	\$42,500,298	3,827	1,610
	76%	24%	70%	30%

Source: Bank Records (9/30/96 to 10/31/99)

LENDING TO BORROWERS OF DIFFERENT INCOMES AND TO BUSINESSES OF DIFFERENT SIZES

The distribution of residential real estate loans reflects adequate penetration among individuals of different income levels including low- and moderate-income individuals. Based on a sample of 60 residential real estate loans originated within the AA, 15% were originated to low-income borrowers and 15% originated to moderate-income borrowers.

FBT accommodates low- and moderate-income individuals by granting small dollar real estate loans. Thirty-one percent of the real estate loans originated for less than \$25,000; 30% originated for \$25,000 to \$49,999; 26% originated for \$50,000 to \$99,999, and 13% originated for \$100,000 or more.

The following tables summarize the bank's distribution of loan originations among borrowers of different income levels:

RESIDENTIAL REAL ESTATE LENDING TO BORROWERS OF DIFFERENT INCOME LEVELS

INCOME LEVEL OF BORROWER	% OF FAMILIES	\$ VOLUME ORIGINATED	% ORIGINATED	# ORIGINATED	% ORIGINATED
Low-income	19%	\$231,765	5%	9	15%
Moderate-income	19%	\$385,600	8%	9	15%
Middle-income	23%	\$734,641	15%	11	18%
Upper-income	39%	\$3,618,050	72%	31	52%
TOTAL	100%	\$4,970,056	100%	60	100%

Source: Bank Records (9/30/96 to 10/31/99)

FBT's lending levels for small business and small farm loans reflect good responsiveness to community credit needs. All of the small farm loans were made to farms with annual revenues less than \$1 million and 82% of the small business loans were made to businesses with annual revenues less than \$1 million. This performance is reflective of the markets in the bank's assessment areas.

As detailed in the following tables, a substantial portion of the loans originated during the evaluation period to small businesses and farms originated for less than \$50,000.

**DISTRIBUTION OF SMALL BUSINESS AND FARM LOANS
BY LOAN SIZE**

LOAN SIZE (\$)	BUSINESS LOANS		FARM LOANS	
	#	%	#	%
< \$25,000	141	29%	191	59%
\$25,000 - \$49,999	89	19%	43	13%
\$50,000 - \$99,999	80	17%	53	16%
\$100,000 - \$249,999	89	19%	29	9%
\$250,000 - \$499,999	41	8%	8	3%
\$500,000 - \$999,999	22	5%	0	0%
> \$1,000,000	15	3%	0	0%
TOTAL	477	100%	324	100%

Source: Bank Records (9/30/96 to 10/31/99).

GEOGRAPHIC DISTRIBUTION OF LOANS

The bank's geographic distribution of residential real estate loans is reasonable based upon the demographics of the assessment area. The geographic analysis is based on a sample of 60 residential real estate loans originated in the evaluation period. Our analysis reflects lending in all BNAs.

GEOGRAPHIC DISTRIBUTION OF LOANS

RESIDENTIAL REAL ESTATE LOAN ORIGINATIONS BY INCOME LEVEL OF BNAs WITHIN AA					
INCOME LEVEL OF BNA	% OWNER OCCUPIED	\$ OF ORIGINATIONS	% OF ORIGINATIONS	# OF ORIGINATIONS	% OF ORIGINATIONS
Low-income	1%	\$100,000	3%	2	3%
Moderate-income	13%	\$225,925	7%	5	8%
Middle-income	64%	\$2,285,656	66%	42	70%
Upper-income	22%	\$828,151	24%	11	19%
TOTAL SAMPLE	100%	\$3,439,732	100%	60	100%

Source: Bank Records (9/30/96 to 10/31/99)

RESPONSE TO COMPLAINTS

The bank has not received any complaints since the prior examination relative to its performance under the CRA.

COMPLIANCE WITH ANTIDISCRIMINATION LAWS

Our Fair Lending review consisted of benchmark and rates and terms analyses of auto purchase loans. No violations of the substantive provisions of the anti-discrimination laws and regulations were discovered during our examination.