



# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

Public Disclosure

April 23, 2007

Community Reinvestment Act  
**Performance Evaluation**

**UMB Bank, National Association**  
**Charter Number: 23920**

**1010 Grand Avenue**  
**Kansas City, MO 64106**

**Office of the Comptroller of the Currency**

**Mid-size Banks - Blue**  
**440 South Lasalle Street 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 **Outstanding**.

The following table indicates the performance level of **UMB Bank, National Association** with respect to the Lending, Investment, and Service Tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			
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:

- The geographic distribution of loans in the Kansas City MA and the state of Kansas is excellent. In the St. Louis MA and the state of Missouri, performance is good. These four areas collectively account for 97 percent of UMB's deposits.
- The borrower distribution of loans in the Kansas City MA and St. Louis MA is good. In the state of Missouri and state of Kansas, performance is excellent.
- Excellent community development lending had a positive impact on the lending test rating.
- An excellent level of qualified investments was found in the Kansas City MA, the St. Louis MA, the state of Kansas, the state of Nebraska, and the state of Oklahoma. Investment performance in the state of Missouri is good. Current and prior period investments addressed primary community development needs in the communities in which UMB has offices.
- UMB's service delivery systems provide adequate access to low- and moderate-income geographies and individuals. The Kansas City MA, the St. Louis MA, and the state of Missouri were given the most weight in the Service Test as 83 percent of the bank's branches and 80 percent of bank deposits are located in these markets. Bank personnel provided their financial expertise through participation in community development services in each rated area.

## 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.

**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 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 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 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

UMB Bank, National Association (UMB) is a \$7.5 billion interstate financial institution headquartered in Kansas City, Missouri. UMB is a wholly owned subsidiary and serves as the lead bank of UMB Financial Corporation (UMBFC), Kansas City, Missouri, an \$8.9 billion regional, multi-bank holding company. UMBFC owns and operates five other national banks, and one trust company, with 140 locations throughout Missouri, Kansas, Illinois, Oklahoma, Nebraska, Colorado, and Arizona. Additionally UMBFC owns the UMB Community Development Corporation (UMB CDC). The UMB CDC was designed to provide low-cost mortgages to developers for the purpose of rehabilitation of distressed properties and to low- and moderate-income persons for the purpose of home improvement of owner-occupied housing.

UMB is a full-service banking institution offering a wide range of products for individuals and businesses. Significant business lines include investment and cash management services, trust services for individuals and corporations, correspondent banking activity, and international banking services. The bank's primary lending focus is commercial loans followed by consumer loans.

The following financial information is reported as of December 31, 2006: The loan portfolio totaled \$2.97 billion and was comprised of 60 percent commercial and commercial real estate loans, 29 percent loans to individuals, 8 percent residential real estate loans, 2 percent agriculture loans, and 1 percent other loans. Net loans represent 56 percent of total deposits and 39 percent of the bank's asset base. Tier 1 capital totaled \$530 million.

UMB operates 115 banking offices throughout its 19 assessment areas (AAs) in five states – Missouri, Kansas, Illinois, Nebraska, and Oklahoma. The AAs consist of two multistate metropolitan areas in Kansas City and St. Louis; eleven other metropolitan areas in St. Joseph, Joplin, Columbia, Springfield, and Jefferson City, in Missouri; Topeka, Lawrence, and Wichita in Kansas; Oklahoma City and Tulsa in Oklahoma; Omaha in Nebraska, and six other non-metropolitan areas in Missouri and Kansas. Approximately 86 percent of the bank's deposits, 59 percent of loans (by number), and 65 percent of loans (by dollar volume) were attributed to locations in the metropolitan areas of Kansas City and St. Louis. UMB Bank Omaha, N.A. merged into UMB Bank, N.A. during this evaluation period.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its communities. The Office of the Comptroller last evaluated UMB's CRA performance on July 7, 2003. The bank received an overall rating of "Satisfactory."



# Scope of the Evaluation

## Evaluation Period/Products Evaluated

The evaluation period for the lending test, excluding community development loans, is January 1, 2003 through December 31, 2006. Products reviewed in the lending test include home mortgage loans, small loans to businesses, and small loans to farms. We used 2005 peer lending data, the most recent data available, for home mortgages, small loans to businesses and small loans to farms to compare UMB's lending performance to other reporting lenders in the AAs.

Due to changes in metropolitan statistical area (MSA) boundaries, we separately evaluated loan data for 2003. Beginning January 1, 2004, collected HMDA and CRA data must use the newly revised MSA boundaries and definitions established by the U.S. Office of Management and Budget.

Our analysis does not include multifamily home mortgage loans. The number of reported loans for this product type is insufficient for meaningful analysis in all AAs.

We used deposit information, reported to the Federal Deposit Insurance Corporation annually, to determine the bank's deposit market share and market presences within its AAs. The most recent deposit information available is as of June 30, 2006.

The evaluation period for the investment and service tests and community development lending is July 7, 2003 through April 23, 2007. At the bank's request, we considered qualified investments made by its affiliates.

## Selection of Areas for Full-Scope Review

In each state where the bank has an office, a sample of AAs within that state was selected for full-scope reviews. Refer to the "Scope" section under each State Rating for details regarding how the areas were selected. Every multistate metropolitan area in which the bank has branches in more than one state received a full-scope review.

## Data Integrity

To assess the accuracy of the data, we conducted an independent test in October 2006 of data for home mortgage products, small loans to businesses, and small loans to farms. Our findings were that the data was accurate and could be relied upon for use in this evaluation.

We performed a review of community development loans, investments, and services. Only those activities that qualified are presented and considered in this evaluation.

## **Ratings**

The bank's overall rating is a blend of the multistate metropolitan area ratings and state ratings. We placed more weight on the 2004-2006 evaluation periods.

We weighted the bank's CRA performance in the Kansas City multistate metropolitan area most heavily because it constitutes 63 percent of the bank's total deposit base, and 37 percent of loan originations (by number) during this evaluation period, and is the bank's headquarters. The St. Louis multistate metropolitan area followed by the state of Missouri, received the next highest weightings.

The St. Louis multistate metropolitan area represents 17 percent of total deposits and 23 percent of loan originations (by number). The state of Missouri represents 13 percent of total deposits and 24 percent of loan originations (by number). The St. Louis multistate metropolitan area received slightly more weight over the state of Missouri because it represents a larger concentration of loans, deposits, and branches in one AA, whereas activity within the state of Missouri is widespread over ten different AAs. Additionally, management considers the St. Louis AA a key market in terms of its operations.

The states of Kansas, Oklahoma, and Nebraska received the least weight in our analysis. Kansas represents 4 percent of deposits and 10 percent of loan originations (by number), Oklahoma represents 3 percent of deposits and 4 percent of loan originations (by number), and Nebraska represents less than 0.5 percent of deposits and 2 percent of loan originations (by number).

The multistate metropolitan area ratings and state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each state rating for details regarding how the areas were weighted in arriving at the overall state rating.

## **Fair Lending Review**

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

# Multistate Metropolitan Area Rating

## Kansas City Multistate Metropolitan Area

**CRA rating for the Kansas City MO-KS MA<sup>1</sup>: Outstanding**

**The lending test is rated: Outstanding**

**The investment test is rated: Outstanding**

**The service test is rated: Low Satisfactory**

The major factors that support this rating include:

- Lending test performance in the Kansas City MA is excellent as evidenced by excellent overall geographic distribution and good overall borrower distribution of loans. The level of community development lending is high and positively impacted the bank's lending performance.
- The level of qualified investments is excellent. A majority of the investment dollars continues to support a complex redevelopment plan the bank initiated during a prior evaluation period. Current period investments largely support affordable housing initiatives.
- Branch distribution is adequate, providing reasonable access to banking services in low- and moderate-income geographies and to individuals of different income levels. Bank personnel provided a good level of community development services during this evaluation period.

## Description of Institution's Operations in the Kansas City MA

UMB operates 39 branch offices and 161 ATMs in the Kansas City AA. The primary business focus is commercial lending. The Kansas City AA represents 63 percent of the bank's deposit base and 37 percent of loan originations (by number) and 50 percent by dollar volume. UMB ranks second in deposit market share among 119 other financial institutions in the AA. Bank deposits total \$3.2 billion and represent 10 percent of the area deposits. Competition for banking services in this AA is strong. Primary competitors include Bank of America and Commerce Bank, which held deposit market shares of 11 percent and 10 percent respectively.

We conducted one community contact in the Kansas City AA with representative of a community service organization. Identified community needs are the ability to obtain banking services and financial assistance programs and services for young persons with low- and moderate income levels.

Refer to the market profile for the Kansas City Multistate MA AA in appendix C for detailed demographics and other performance context information.

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<sup>1</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

## **LENDING TEST**

The bank's performance under the Lending Test is rated "Outstanding". Refer to Table 1 Lending Volume in the Multistate Metropolitan Areas section of appendix D for the facts and data used to evaluate the bank's lending activity.

Our analysis gave equal weight to small loans to businesses and home mortgage loans, which account for 51 percent and 46 percent of the reported loans (by number) over the evaluation period, respectively. An analysis of UMB's small farm lending is not meaningful since this loan type represents less than 1 percent of the reported loans in the Kansas City AA. Small farm loans are not an identified credit need for this predominately metropolitan area.

### **Lending Activity**

Lending levels reflect good responsiveness in relation to area credit needs and the bank's deposit market share. UMB has a deposit market share of 10 percent, which ranks second in the Kansas City MSA. Of all HMDA data reported in the Kansas City MA for the year 2005, UMB ranked second in home improvement loans. And, of all CRA data reported in the Kansas City MA for the year 2005, UMB ranked 14<sup>th</sup> in loans to small businesses.

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

The overall geographic distribution of loans is excellent.

#### ***Home Mortgage Loans***

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

The geographic distribution of home mortgage loans is good. Home improvement loans received the most weight in our analysis, followed by home refinance and home purchase loans. These loans respectively represent 58 percent, 27 percent, and 15 percent of the bank's total home mortgage lending (by number).

Penetration in moderate-income tracts is excellent in 2004-2006. The distribution of home improvement and refinance loans in moderate-income geographies, at 17 percent and 20 percent, respectively, exceed demographics which indicate that 16 percent of owner-occupied housing is located in moderate-income tracts. The distribution of home purchase loans, at 15 percent, is near to demographics. In 2003, penetration in moderate-income tracts is good. The distribution of home improvement and home purchase loans is near to demographics. The distribution of refinance loans is adequate. Market share in moderate-income tracts is consistent with the bank's overall market share.

In low-income tracts, lending opportunities are limited as less than 4 percent of all owner occupied housing units are located in low-income geographies. The bank's performance reasonably reflects area demographics. In 2004-2006, the distribution of home purchase, home improvement, and home refinance lending in low-income geographies is adequate. In 2003, the distribution of home purchase loans exceeds demographics; the distribution of home

improvement and refinance loans is adequate. Market share by product, reasonably compare to the bank's overall market share.

A geographical analysis of multifamily loans is not meaningful. During the evaluation period, UMB originated four loans.

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

Refer to Table 6 in the Multistate Metropolitan Areas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Penetration of small loans to businesses in low- and moderate-income geographies is excellent. In 2004-2006, area demographics show that 4 percent of small businesses are located in low-income geographies and 18 percent are located in moderate-income geographies. The bank's distribution to low- and moderate-income geographies is 6 percent and 24 percent, respectively. Distributions in both the low- and moderate-income tracts exceed demographics and market share in these tracts exceeds the bank's overall market share for small business loans. In 2003, the bank's performance is also excellent and exceeds demographics in low- and moderate-income geographies.

### ***Lending Gap Analysis***

Our geographic distribution analysis included a review for lending gaps, particularly in low- and moderate-income areas. We did not identify any unexplained conspicuous gaps in the Kansas City AA.

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

We performed an analysis of the inside/outside ratio by state. A substantial majority of the loans were originated within the bank's defined AAs. This positively impacts the bank's lending test performance.

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

The overall borrower distribution of loans is good.

### ***Home Mortgage Loans***

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

The distribution of home mortgage loans to borrowers of different income levels is excellent in 2004-2006.

Lending performance to moderate-income borrowers is excellent. Demographics show that 18 percent of families within the AA are moderate-income. The distribution of home purchase, home improvement, and home refinance loans to moderate-income families is above

demographics. Market shares in the moderate-income tracts exceed the bank's overall market shares for home improvement and home refinance loans and equal to the overall market share for home purchase loans. Performance in 2003 is also excellent. The distribution of home purchase, home improvement, and refinance loans exceed demographics.

Lending performance to low-income borrowers is good in 2004-2006. Demographics report that 18 percent of families are low-income. Six percent of families in the AA report income below the poverty level. Considering the percentage of families below poverty level, the distribution of home purchase and refinance loans is excellent, and the distribution of home improvement loans is good. Market shares for home purchase and refinancing loans are particularly strong to low-income borrowers and exceed the bank's overall market shares. For home improvement loans, market share to low-income borrowers substantially meets the bank's overall market share. Performance is also excellent in 2003 given the percentage of families below poverty.

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

Refer to Table 11 in the Multistate Metropolitan Areas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is poor in 2004-2006. Demographics indicate 64 percent of area businesses report annual revenues of \$1 million or less. Thirty-five percent of the bank's total reportable small loans to businesses were made to businesses with annual revenues of less than \$1 million. The market share for loans to small businesses reasonably compares to UMB's overall market share. In 2003, performance is good. The distribution of loans to businesses with revenues of \$1 million or less is adequate. However, the market share to these businesses exceeds the overall market share.

### **Community Development Lending**

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

Our analysis gave positive consideration to community development lending activities. The bank's responsiveness is excellent given its size, lending capacity and area opportunities. UMB originated 155 community development loans totaling \$434 million over the evaluation period, including:

- 112 loans totaling \$344 million that promote economic development;
- 12 loans totaling \$80 million that revitalize/stabilize low- and moderate-income areas;
- 15 loans totaling \$5.5 million to organizations that provide social services targeted to low- and moderate-income individuals; and,
- 16 loans totaling \$3 million for the acquisition, construction, or rehabilitation of affordable housing for low- and moderate-income families.

Community development lending performance had a positive impact on the lending test rating for the Kansas City Multistate Metropolitan Area.

### **Product Innovation and Flexibility**

UMB offers several programs that use flexible or innovative underwriting to assist low- and moderate-income individuals or geographies. Most notable are its home improvement and home purchase lending programs, which generally offer below market rates and further subsidies of interest rates or closing costs through public and private partnerships. The success of these programs is evidenced in the bank's overall excellent borrower distribution of home mortgage lending.

### **INVESTMENT TEST**

The bank's performance under the Investment Test is rated "Outstanding". Refer to Table 14 in the Multi-state Metropolitan Areas section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

UMB and its affiliates provided an excellent level of qualified investments in the Kansas City AA, which total \$47 million and represented 58 percent of total CRA investments for the bank. A substantial majority of the investment dollars continues to support a complex redevelopment plan the bank initiated during a prior evaluation period. Current period investments total \$15 million and primarily consisted of:

- \$7 million invested in seven mortgage backed securities pools that were made to low- and moderate-income individuals in the Kansas City AA; and,
- \$5 million invested in 12 bond issuances benefiting local school districts in low- and moderate-income areas in the Kansas City AA. Proceeds were used for constructing, equipping and furnishing additional classrooms as well as upgrading heating and cooling systems in designated schools that predominantly serve low- and moderate-income families.

Charitable contributions totaled \$610,000 and represented donations to 37 organizations that primarily provide targeted services to low- and moderate-income individuals. More weight was given to current period investments in assigning an overall rating.

### **SERVICE TEST**

The bank's performance under the Service Test is rated "Low Satisfactory." Refer to Table 15 in the Multistate Metropolitan Areas section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

### **Retail Banking Services**

Branch distribution is adequate, providing reasonable access to banking services in low- and moderate-income geographies and to individuals of different income levels. UMB also provides a good level of community development services in the Kansas City AA.

The percentage of branches in low-income tracts is lower than the percentage of population in those tracts. The percentage of branches in moderate-income tracts is significantly less than demographics. However, of the 34 branches in middle- or upper-income tracts, 16 are adjacent to low- and moderate-income tracts. In addition, there is one branch in a tract with no income level designation in the business district of Kansas City. These branches help provide reasonable access to residents in adjoining low- and moderate-income tracts.

During the evaluation period, UMB opened five and closed seven branches. Two branches were opened and two branches were closed in moderate-income tracts. Branch openings and closings did not adversely affect the accessibility of the bank's delivery systems.

The percentage of ATMs in low- and moderate-income tracts is slightly less than the percentage of population in those tracts. The percentage of ATMs in these geographies doubled during the evaluation period. This was due primarily to the re-drawing of census tract boundaries in 2004. Of UMB's 128 ATMs in middle- or upper-income tracts, 50 are adjacent to low- and moderate-income tracts, which help provide reasonable access to these areas.

There is no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and individuals. A majority of branches and several drive-up facilities offer extended hours on Friday and Saturday. A majority of ATMs offer 24-hour service.

Other alternative delivery systems offered by UMB include:

- Electronic banking: Customers can access deposit accounts to check balances, view transactions, transfer funds, view imaged checks, reorder checks, conduct transfers between accounts and complete a mortgage application 24 hours per day, seven days per week through the bank's Internet site. Bill payment is offered for a fee. UMB also offers a telephone banking service that allows 24-hour access to accounts.
- Bank by Mail: Allows customers to mail deposits, payments and messages to the bank.

The bank does not maintain information to demonstrate the effectiveness or impact of the alternative delivery systems in low- or moderate-income geographies or use of these systems by low- and moderate-income individuals. Therefore, these services did not impact the service test rating for the Kansas City MA.

### **Community Development Services**

UMB provided a good level of community development services in the Kansas City MA.

UMB bank staff provided their financial expertise to 60 different organizations that promote community development initiatives in the AA. Over half of the organizations provide community services to low- and moderate-income individuals such as youth and senior citizen programs, food pantries, job training, and health care. Other community development services provided by bank staff were to organizations that helped revitalize and stabilize low- and moderate-income geographies and provide affordable housing.



UMB offers Electronic Transfer Accounts to individuals who receive periodic payments from the federal government. These accounts support the government's initiative to improve access to financial services and encourage low- and moderate-income individuals to establish accounts to receive their payments. UMB also participates in the Temporary Aid to Needy Families program in which electronic cards are used to distribute benefits to persons without direct deposit accounts. Recipients can access their benefits through UMB's ATMs.

UMB offers government check cashing services. Customers can cash government checks, regardless of amount. Non-customers may cash government checks up to \$500 for a small fee, established to be more cost effective than similar services offered by area non-bank check cashers.

UMB provides public fund and cash management services to multiple organizations that primarily serve low- and moderate-income individuals and help revitalize and stabilize low- and moderate-income geographies. Cash management services include technical assistance. These services are provided at either reduced or waived fees.

# Multistate Metropolitan Area Rating

## St. Louis Multistate Metropolitan Area

**CRA rating for the St. Louis MO-IL MA<sup>2</sup>: Outstanding**

**The lending test is rated: Outstanding**

**The investment test is rated: Outstanding**

**The service test is rated: High Satisfactory**

The major factors that support this rating include:

- Lending test performance in the St. Louis AA is excellent as evidenced by an overall good geographic and borrower distribution of loans. The level of community development lending is high and positively impacted the bank's lending performance.
- UMB demonstrated responsiveness to community development needs with an excellent level of qualified investments. A substantial majority of the investment dollars supports affordable housing initiatives. Affordable housing was identified as a primary need within the AA.
- Branch distribution is accessible to geographies and individuals of different income levels. Bank personnel provided a relatively high level of community development services during this evaluation period.

## Description of Institution's Operations in the St. Louis MA

UMB operates 28 branch offices and 67 ATMs in the AA. The primary business focus in the St. Louis AA is home mortgage lending followed by commercial and small business lending. St. Louis AA represents 17 percent of the bank's deposit base and 23 percent of loan originations (by number). UMB ranks 10th in deposit market share among 97 financial institutions with a presence in the St. Louis AA. Bank deposits total \$860 million and represent 2 percent of AA deposits. Strong competition for banking services exists in this market. Primary competitors include U.S. Bank, Bank of America, and Commerce Bank, which held deposit market shares of 18 percent, 15 percent, and 8 percent respectively.

We conducted one community contact in the St. Louis MA with a representative of a city housing organization. Identified community credit needs within the AA include home repair for the city's aging housing stock and affordable housing.

Refer to the market profile for the St. Louis Multistate AA in appendix C for detailed demographics and other performance context information.

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<sup>2</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

## **LENDING TEST**

The bank's performance under the Lending Test is rated "Outstanding." Refer to Table 1 Lending Volume in the Multistate Metropolitan Areas section of appendix D for the facts and data used to evaluate the bank's lending activity.

Our analysis in this area gave the most weight to home mortgage loans, followed by small loans to businesses. Home mortgage and small loans to business respectively account for 71 percent and 26 percent of the reported loans (by number) over the evaluation period. An analysis of UMB's small farm lending was not performed since this loan type represents less than 1 percent of the reported loans in the St. Louis AA. Small farm loans are not an identified credit need for this predominately metropolitan area.

### **Lending Activity**

Lending levels reflect good responsiveness in relation to area credit needs and the bank's deposit market share. UMB has a deposit market share of 2 percent, which ranks 10<sup>th</sup> in the St. Louis AA. Of all HMDA data reported in the St. Louis AA for the year 2005, UMB ranked 10<sup>th</sup> in home improvement loans. And, of all CRA data reported in the St. Louis AA for the year 2005, UMB ranked 18<sup>th</sup> in small business loans.

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

The overall geographic distribution of loans is good. Home mortgage loans carry the most weight as they represent 71 percent of reported loans in the MA.

#### ***Home Mortgage Loans***

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

The geographic distribution of home mortgage loans is good. Home improvement loans received the most weight in our analysis as they represent 80 percent of the bank's home mortgage lending (by number) in this area. Home purchase and refinancing loans represent 6 percent and 14 percent respectively.

Penetration in the moderate-income tracts is excellent in 2004-2006. Area demographics indicate that 17 percent of owner occupied housing units are located in moderate-income geographies. The bank's distribution of home purchase, home improvement, and home refinance loans in moderate-income areas was 23 percent, 19 percent, and 20 percent, respectively. The market shares for all three home mortgage products in moderate-income tracts are consistent with the bank's overall market share. Performance is also excellent in 2003. The distribution of home improvement and home purchase loans exceeds demographics. The distribution of refinance loans is adequate.

Penetration in low-income tracts is adequate. Lending opportunities are limited with less than 4 percent of owner-occupied housing located in low-income geographies. The bank's distribution of home purchase, home improvement, and home refinance loans in low-income

geographies is adequate in 2004-2006. In 2003, the distribution of home purchase and home improvement loans is poor. The distribution of refinance loans is very poor.

A geographical analysis of multifamily loans is not meaningful. One loan was originated during our evaluation period.

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

Refer to Table 6 in the Multistate Metropolitan Areas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses in moderate-income geographies is excellent in 2004-2006. The distribution in moderate-income areas exceeds demographics. Nineteen percent of area businesses are located in moderate-income geographies. Twenty percent of the bank's reportable loans were originated to businesses located within moderate-income tracts. In 2003, performance in moderate-income areas is also excellent and exceeds demographics.

The distribution of loans in low-income geographies is good. In 2004-2006, performance is near to demographics. Just over 5 percent of area businesses are located in low-income geographies. The bank originated just short of 5 percent of all reportable loans in low-income geographies. In 2003, the distribution of loans in low-income areas is adequate.

Market shares in both low- and moderate-income geographies meet or exceed the bank's overall market share of reported small loans to businesses.

### ***Lending Gap Analysis***

Our geographic distribution analysis included a review for lending gaps, particularly in low- and moderate-income areas. We did not identify any unexplained conspicuous gaps in the St. Louis AA.

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

We performed an analysis of the inside/outside ratio by state. A substantial majority of the loans were inside the bank's stated AAs. This positively impacts the lending test performance.

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

The overall borrower distribution of loans is good.

### ***Home Mortgage Loans***

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

The distribution of home purchase, home improvement, and home refinance loans to borrowers of different income levels is excellent.

Performance with moderate-income borrowers is excellent in 2004-2006. Demographics indicate that 18 percent of families report moderate-income levels. The distribution of home purchase, home improvement, and home refinance loans to moderate-income borrowers was 27 percent, 25 percent, and 30 percent, respectively. In 2003, the distribution of home purchase, home improvement, and refinance loans is excellent and exceeds demographics.

Performance with low-income borrowers is excellent in 2004-2006 considering the percentage of families below the poverty level. Low-income families comprise 19 percent of families within the assessment area with 8 percent reporting income below the poverty level. Distributions of home purchase, home improvement, and home refinance loans to low-income borrowers are 18 percent, 10 percent, and 17 percent, respectively. In 2003, performance is good considering the percentage of families below poverty.

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

Refer to Table 11 in the Multistate Metropolitan Areas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

In 2004-2006, the distribution of loans to businesses of different sizes is poor with 38 percent of reported loans made to small businesses, compared to 65 percent of all businesses for whom revenue information is available reporting income of less than \$1 million. In 2003, the distribution of loans to businesses with revenues of \$1 million or less is adequate.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the Multistate Metropolitan Areas section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

Our analysis gave positive consideration to community development lending activities. The bank's responsiveness is excellent given its size, lending capacity and area opportunities. UMB originated 148 community development loans totaling \$274 million over the evaluation period, including:

- 46 loans totaling \$139 million that promote economic development;
- 38 loans totaling \$80 million that revitalize/stabilize low- and moderate-income areas;
- 31 loans totaling \$45 million to organizations that provide social services targeted to low- and moderate-income individuals; and,
- 33 loans totaling \$10 million for the acquisition, construction or rehabilitation of affordable housing for low- and moderate-income families.

Community development lending performance had a positive impact on the lending test rating for the St. Louis Multistate Metropolitan Area.

### **Product Innovation and Flexibility**

UMB offers several programs that use flexible or innovative underwriting to assist low- and moderate-income individuals or geographies. Most notable are its home improvement and home purchase lending programs, which generally offer below market rates and further subsidies of interest rates or closing costs through public and private partnerships. The success of these programs is evidenced in the bank's overall excellent home mortgage lending distributions.

### **INVESTMENT TEST**

The bank's performance under the Investment Test is rated "Outstanding". Refer to Table 14 in the Multi-state Metropolitan Areas section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

UMB and its affiliates provided an excellent level of qualified investments in the St. Louis MA, which total \$11 million and represented 13 percent of total CRA investments for the bank. Current period investments primarily consist of:

- \$3.8 million invested in 23 projects within the St. Louis AA by UMB Community Development Corporation (CDC), a subsidiary of UMBFC. The purpose of the CDC is to provide financing for affordable housing initiatives. Specific focus is on providing low-cost financing to developers for either new construction or the rehab of properties in low- and moderate-income (LMI) areas to promote revitalization and/or stabilization efforts. The CDC also provides financing for home repairs to either LMI borrowers or in LMI areas targeted for revitalization;
- \$2.3 million invested in two mortgage backed securities pools that were made to low- and moderate-income individuals in the St. Louis AA;
- \$1.8 million invested in two Industrial Revenue Bonds (IRB) that provided permanent financing for a community development organization to purchase a new building. The IRB was made in conjunction with the St. Charles County Economic Development Corporation; and
- \$1.3 million invested in St. Louis Equity Funds. The Funds finance the new construction or renovation of affordable rental housing using low-income housing tax credits.

Charitable contributions totaled \$979,000 and represented donations to approximately 116 organizations that primarily provide affordable housing, assist with revitalization areas, and offer targeted services to low-and moderate-income individuals including area youths.

### **SERVICE TEST**

The bank's performance under the Service Test is rated "High Satisfactory." Refer to Table 15 in the Multistate Metropolitan Areas section of appendix D for the facts and data used to

evaluate the distribution of the bank's branch delivery system and branch openings and closings.

### **Retail Banking Services**

UMB's branch delivery systems are accessible to geographies and individuals of different income levels. UMB also provided a high level of community development services in its AA.

The percentage of branches in moderate-income tracts is slightly higher than the percentage of population residing in those tracts. The percentage of branches in these geographies tripled during the examination period. This was due primarily to the re-drawing of census tract boundaries in 2004. UMB does not have any branches in low-income tracts. However, four of the 20 branches in middle- or upper-income tracts are adjacent to low- or moderate-income tracts, which help to provide reasonable access to residents in those areas.

During the evaluation period, UMB opened three and closed four branches. No branches were opened or closed in low- or moderate-income areas. Branch opening and closings did not adversely affect the accessibility of UMB's delivery systems to low- and moderate-income areas.

The percentage of ATMs in low- and moderate-income tracts is slightly higher than the percentage of population in those tracts. Of the 41 ATMs in middle- or upper-income tracts, five are adjacent to low- or moderate-income tracts, which help provide reasonable access to residents in those areas.

There is no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and individuals. A majority of branches and several drive-up facilities offer extended hours on Friday and Saturday. A majority of ATMs offer 24-hour service.

Refer to the Service Test comment for the Kansas City AA for details on other alternative delivery systems offered by UMB.

### **Community Development Services**

UMB provided a relatively high level of community development services in the St. Louis MA.

UMB bank staff provided their financial expertise to 98 different organizations that promote community development initiatives in the AA. The majority of the organizations provide community services to low- and moderate-income individuals such as programs for youth, single parent families, senior citizens, and the disabled. Financial education training targeted to low- and moderate-income individuals is also provided. Other community development services provided by bank staff were to organizations that helped revitalize and stabilize low- and moderate-income geographies and provide affordable housing.

UMB provides public fund and cash management services to multiple organizations that primarily serve low- and moderate-income individuals and help revitalize and stabilize low- and moderate-income geographies. Cash management services include technical assistance. These services are provided at either reduced or waived fees.

Refer to the Service Test comment for the Kansas City AA for details on community development services offered by UMB via Electronic Transfer Accounts, and Temporary Aid to Needy Families.



# State Rating

## State of Missouri

### CRA Rating for Missouri<sup>3</sup>: Outstanding

The lending test is rated: Outstanding

The investment test is rated: High Satisfactory

The service test is rated: High Satisfactory

The major factors that support this rating include:

- UMB demonstrated excellent performance in lending to low- and moderate-income individuals. Performance in low- and moderate-income geographies is good. The level of community development lending is high and positively impacted the bank's lending performance.
- UMB provided a good level of community development investments in the state of Missouri. Performance in the St. Joseph MA is adequate. Qualified investments addressed the need of affordable housing for low- and moderate-income families. Based on limited-scope reviews, the bank's performance in Joplin, Springfield, and Jefferson City MAs, and the non-MA combined AA is stronger than the bank's performance in the St. Joseph MA and had a positive impact on the bank's overall Investment Test rating for the state of Missouri.
- Branch distribution is accessible to geographies and individuals of different income levels. Performance in the St. Joseph MA is excellent. Based on limited-scope reviews, the bank's performance in Joplin, Jefferson City, and the non-MA combined AA is weaker than the bank's performance in the St. Joseph MA. This had a negative impact on the bank's overall Service Test rating for the state of Missouri. Bank personnel provided an adequate level of community development services during this evaluation period.

## Description of Institution's Operations in Missouri

UMB operates 31 branches and 59 ATMs within its AAs in the state of Missouri. The Missouri AAs include five metropolitan areas: Columbia, Jefferson City, Joplin, Springfield, and St. Joseph; and four non-metropolitan areas Central Missouri, Northeast Missouri, North Central Missouri, and Monett. The state of Missouri AAs represents 13 percent of the bank's deposit base and 24 percent of loan originations (by number).

UMB ranks seventh in deposit market share among 127 financial institutions operating in its Missouri AAs. Bank deposits total \$651 million and represent 3 percent of the State of

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<sup>3</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Missouri AAs deposits. Major competitors are Great Southern Bank, Commerce Bank and U.S. Bank, with 8 percent, 7 percent, and 6 percent of the market respectively.

Refer to the market profile for the St. Joseph AA in appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

## **Scope of Evaluation in Missouri**

We evaluated the bank's performance in the State of Missouri by performing a full-scope review in the St. Joseph MA and limited-scope reviews in the Columbia, Jefferson City, Joplin, Springfield, and the combined non-metropolitan areas. The state rating is primarily based on performance in the St. Joseph MA.

The St. Joseph MA represents 16 percent of deposits and 11 percent of loan originations (by number) in the State of Missouri. UMB operates four branch offices and six ATMs in the AA. UMB ranks sixth in deposit share among 13 financial institutions with a presence in the St. Joseph AA. Bank deposits total \$107 million and represent 7 percent of AA deposits.

We conducted one community contact in the St. Joseph MA with a department of the city government that oversees the HUD grant programs. Affordable housing, specifically home purchases, was identified as the primary credit need of this area.

Refer to the performance tables in appendix A for additional information.

## **LENDING TEST**

The bank's performance under the Lending Test is rated "Outstanding." Refer to Table 1 Lending Volume in the state of Missouri section of appendix D for the facts and data used to evaluate the bank's lending activity.

Our analysis in the St. Joseph AA gave the most weight to home mortgages, followed by small loans to businesses and small loans to farms. All home mortgage loans, small loans to businesses, and small loans to farms respectively account for 59 percent, 32 percent, and 9 percent of the reported loans (by number) over the evaluation period.

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

Based on a full-scope review, performance in the St. Joseph MA is rated "Outstanding".

### **Lending Activity**

Lending levels reflect good responsiveness in relation to area credit needs and the bank's deposit market share. UMB has a deposit market share of 7 percent, which ranks sixth in the St. Joseph MA. Of all HMDA data reported in the St. Joseph MA for the year 2005, UMB ranked eighth in home improvement loans. And, of all CRA data reported in the St. Joseph MA for the year 2005, UMB ranked 15<sup>th</sup> in small business loans.

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

The geographic distribution of loans is good based on performance in moderate-income tracts. There are no low-income tracts in the St. Joseph MA.

### ***Home Mortgage Loans***

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

The geographic distribution of reported home mortgage loans is good. Home improvement and home refinance loans received the most weight in our analysis, followed by home purchase loans. These loans respectively represent 44 percent, 32 percent, and 24 percent, respectively, of the bank's total home mortgage lending (by number) in this area.

Penetration in moderate-income tracts is good in 2004-2006. Ten percent of all home improvement loans were originated in moderate-income geographies. This compares favorably to area demographics which indicate that 9 percent of owner-occupied housing is located in moderate-income geographies. Distribution of home purchase and refinance loans is good and adequate, respectively. Market share in moderate-income geographies exceeds the bank's overall market share for both home purchase and home improvement loans. In 2003, penetration in moderate-income tracts is excellent. The distribution of home purchase, home improvement, and refinance loans is above demographics.

A geographical analysis of multifamily loans is not meaningful. UMB made one loan during our evaluation period.

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

Refer to Table 6 in the State of Missouri section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Performance in moderate-income areas is excellent in 2004-2006. Eighteen percent of all businesses are located in moderate-income geographies. Twenty percent of the bank's reported business loans were originated in moderate-income geographies. In 2003, performance is also excellent in moderate-income areas and the distribution of loans is above demographics. Market share in moderate-income geographies exceeds the bank's overall market share.

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

Refer to Table 7 in the State of Missouri section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The distribution of small loans to farms in the moderate-income areas is adequate in 2003-2006 considering the limited lending opportunities. Of the 55 small farm loans originated

during the evaluation period, none were in the moderate-income tracts. However, only 12 farms are located in the five moderate-income tracts.

### ***Lending Gap Analysis***

Our geographic distribution analysis included a review for lending gaps, particularly in moderate-income areas. We did not identify any conspicuous lending gaps in the St. Joseph AA.

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

We performed an analysis of the inside/outside ratio by state. In the state of Missouri, over 90 percent of loans were within the AAs.

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

The overall borrower distribution of loans is excellent.

### ***Home Mortgage Loans***

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

The distribution of home mortgage loans to borrowers of different income levels is excellent on 2004-2006. Performance with moderate-income borrowers is excellent. Area demographics indicate that 18 percent of families report moderate-income levels. The bank's distribution of home purchase, home improvement, and home refinance loans to moderate-income borrowers was 33 percent, 26 percent, and 28 percent, respectively. In 2003, performance is good. The distribution of home improvement loans exceeds demographics. The distribution of home refinance loans is near to demographics. UMB originated six home purchase loans in 2003; however, none were to moderate-income borrowers.

Performance with low-income borrowers is excellent in 2004-2006 considering the percentage of families below the poverty level. Area demographics indicate that 18 percent of all families report low-income levels. The distribution of home purchase, home improvement, and home refinance loans were 13 percent, 10 percent, and 16 percent, respectively. Eight percent of families are below the poverty level. In 2003, the distribution of home improvement and refinance loans is good considering the percentage of families below poverty. No home purchase loans were made to low-income borrowers.

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

Refer to Table 11 in the State of Missouri section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes is good in 2004-2006. Sixty-one percent of all businesses for which information was available reported revenue of \$1 million or

less. Fifty-two percent of the bank's reported loans were originated to small businesses. In 2003, the distribution of loans is excellent and above demographics. Market share for these loans exceeds the bank's overall market share.

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

Refer to Table 12 in the State of Missouri section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes is excellent in 2004-2006. One hundred percent of reportable small farm loans were originated to farms with annual revenues of \$1 million or less. This exceeds area demographics which indicate that 97 percent of all farms are small farms. The bank's market share for these loans also exceeds its overall market share. In 2003, performance is good and the distribution of loans is near to demographics.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the State of Missouri section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

Our analysis gave positive consideration to community development lending activities. UMB originated one community development loan to a small business totaling \$4.5 million in the St. Joseph MA. The loan facilitated economic development by providing 29 jobs for low- or moderate-income individuals.

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

Based on limited-scope reviews, the bank's performance in 2004-2006 under the lending test in the combined non-metropolitan areas is not inconsistent with the bank's overall "Outstanding" performance under the lending test in Missouri. In Joplin, Springfield, Columbia, and Jefferson City MAs, performance is weaker than the bank's overall performance in the state. The bank's performance in these MAs is good.

In 2003, performance in the Joplin, Springfield, Columbia, and Jefferson City MAs, and in the combined non-metropolitan areas is also weaker than the bank's overall performance in the state. In the Joplin and non-MAs, performance is good. In the Springfield, Columbia, and Jefferson City AAs, performance is adequate. This performance does not impact the overall conclusions.

### **Product Innovation and Flexibility**

UMB offers several programs that use flexible or innovative underwriting to assist low- and moderate-income individuals or geographies. Most notable are its home improvement and home purchase lending programs, which generally offer below market rates and further

subsidies of interest rates or closing costs through public and private partnerships. The success of these programs is evidenced in the bank's overall excellent borrower distribution of home mortgage lending.

## **INVESTMENT TEST**

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

The bank's performance under the Investment Test in Missouri is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the St. Joseph MA is adequate. Based on limited-scope reviews, the bank's performance in Joplin, Springfield, and Jefferson City MAs, and the non-MA combined AA is stronger than the bank's performance in the St. Joseph MA and had a positive impact on the bank's overall Investment Test rating for the state of Missouri. Refer to Table 14 in the state Missouri section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period for the St. Joseph MA, charitable donations total \$54,000 to four local organizations that offer services targeted to low- and moderate-income individuals and families.

We gave positive consideration in this AA for MHDC (Missouri Housing Development Commission) bonds totaling \$9 million. This bond program provides low- and moderate-income individuals/families with the opportunity to purchase single family residences within the state of Missouri. This investment has the potential to benefit the St. Joseph MA.

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

Based on limited-scope reviews, the bank's performance under the Investment Test in the combined Joplin, Springfield, and Jefferson City MAs, and in the non MA AA is stronger than the bank's overall "High Satisfactory" performance in the state of Missouri. Performance in these AAs had a positive impact on the bank's overall Investment Test rating for the state of Missouri.

The bank's investment performance for the Columbia MA is weaker than its overall performance for the state of Missouri due to the limited number and amount of qualified investments made. Performance in this AA is considered poor and did not adversely impact the overall rating for the state of Missouri.

We gave positive consideration for MHDC bonds totaling 9 million, which have the potential to benefit the limited-scope AAs in the state of Missouri. Refer to comments under "Conclusions for Areas Receiving Full-Scope Reviews" for additional detail.

## **SERVICE TEST**

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

The bank's performance under the Service Test in Missouri is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the St. Joseph is excellent. Based on limited-scope reviews, the bank's performance in the Joplin and Jefferson City MAs, and the non-MA combined AA is weaker than the bank's performance in the St. Joseph MA and had a negative impact on the bank's overall Service Test rating for the state of Missouri. Refer to Table 15 in the state of Missouri section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

### **Retail Banking Services**

UMB's service delivery systems are readily accessible to geographies and individuals of different income levels in the St. Joseph AA. The level of community development services provided by bank staff is adequate.

The bank operates four branches and six ATMs within the St. Joseph MA. Two branches and one ATM are located in moderate-income geographies. The distribution exceeds the percentage of population residing in moderate-income geographies. In addition, one of the four branches and one of the four ATMs in middle- or upper-income tracts are adjacent to moderate-income tracts. The St. Joseph MA does not have any low-income geographies. UMB did not open any branches and closed one branch in an upper-income area during the evaluation period. The branch closing did not adversely affect the accessibility of the bank's delivery systems.

There is no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and individuals. Drive-up facilities offer extended hours on Friday and Saturday and ATMs offer 24-hour service.

Refer to the Service Test comment for the Kansas City AA for details on other alternative delivery systems offered by UMB.

### **Community Development Services**

UMB provided an adequate level of community development services in the St. Joseph AA.

UMB bank staff provided their financial expertise to three different organizations that promote community development initiatives in the AA. One organization provides community services targeted to low- and moderate-income individuals. One organization provides affordable housing and one organization helps revitalize and stabilize low- and moderate-income geographies.

Refer to the Service Test comment for the Kansas City AA for details on community development services offered by UMB via Electronic Transfer Accounts and Temporary Aid to Needy Families.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Columbia and Springfield MAs is not inconsistent with the bank's overall "High Satisfactory"

performance under the service test in Missouri. In the Joplin and Jefferson City MAs, and the combined non-metropolitan areas, the bank's performance is weaker than the bank's overall performance in the state. Performance is considered weaker because there are no branches in the low- and moderate-income tracts of these AAs. Weaker performance had a negative impact on the bank's overall Service Test rating for the state of Missouri since these AAs represent 64 percent of deposits in the state.



# State Rating

## State of Kansas

### CRA Rating for Kansas<sup>4</sup>: Outstanding

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: Outstanding

The major factors that support this rating include:

- UMB demonstrates excellent performance in lending to low- and moderate-income geographies, and to low- and moderate-income borrowers and small businesses.
- Performance under the investment test is excellent. UMB made qualified investments and charitable contributions totaling \$512,000 to agencies that provide community services for low- and moderate-income individuals and affordable housing in the Topeka MA. These contributions positively impacted the identified AA needs.
- Branch distribution is readily accessible to geographies and individuals of different income levels.

## Description of Institution's Operations in Kansas

UMB operates 11 branches and 12 ATMs within five AAs in the State of Kansas. The Kansas AAs include three metropolitan areas: Topeka, Lawrence, and Wichita; and two non-metropolitan areas: Atchison and Fort Scott. The State of Kansas AAs represents 4 percent of the bank's total deposits and 11 percent of loan originations (by number).

UMB ranks 15<sup>th</sup> in deposit market share among 73 financial institutions operating in the Kansas AAs. Bank deposits total \$189 million and represent approximately 2 percent of the market. Major competitors are Capitol Federal Savings, Intrust Bank, and Bank of America with 16 percent, 15 percent, and 10 percent of the market respectively.

Refer to the market profile for the Topeka AA in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

## Scope of Evaluation in Kansas

We evaluated the bank's performance in the State of Kansas by performing a full-scope review in the Topeka AA and limited-scope reviews in the Lawrence and Wichita MAs and the

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<sup>4</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

combined non-metropolitan areas. The state rating is primarily based on the performance in the Topeka AA, however, since the limited-scope AAs represented a substantial portion of the bank's lending and investment activities, the performance in these AAs impacted the final rating assigned to the State of Kansas.

The Topeka AA represents 45 percent of deposits and 19 percent of loan originations (by number) in the state. UMB operates four branch offices and five ATMs in the AA. The primary business focus in the Topeka AA is commercial lending. UMB ranks ninth in deposit market share among 20 financial institutions with a presence in the Topeka AA. Bank deposits total \$84 million and represent 2 percent of area deposits.

We conducted one community contact in the Topeka AA with an Assistant Director of Housing and Neighbor Development for the City of Topeka. Our contact identified financial education for young people and home improvement lending as primary needs within the community.

Refer to the performance tables in appendix A for additional information.

## **LENDING TEST**

The bank's performance under the Lending Test is rated "Outstanding". Refer to Table 1 Lending Volume in the State of Kansas section of appendix D for the facts and data used to evaluate the bank's lending activity.

Our analysis in the Topeka AA gave equal weight to home mortgages and small loans to businesses. Home mortgages and small loans to businesses respectively account for 50 percent and 49 percent of the reported loans (by number) over the evaluation period. An evaluation of UMB's small farm lending was not performed since this loan type represents less than 1 percent of the reported loans in the Topeka AA. Small farm loans are not an identified credit need for this predominately metropolitan area.

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

Based on a full-scope review, performance in the Topeka AA is rated "Outstanding".

#### **Lending Activity**

Lending levels reflect good responsiveness in relation to area credit needs and the bank's deposit market share. UMB has a deposit market share of 2 percent, which ranks ninth in the Topeka AA. Of all HMDA data reported in the Topeka AA for the year 2005, UMB ranked fifth in home improvement loans. Of all CRA data reported in the Topeka AA for the year 2005, UMB ranked 11<sup>th</sup> in loans to small businesses.

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

The overall geographic distribution of loans is excellent based primarily on performance in moderate-income tracts. The Topeka AA contains only one low-income tract.

#### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4, and 5 in the State of Kansas section of appendix D 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 home mortgage loans is excellent in 2004-2006. Penetration in moderate-income tracts is excellent. The distribution of home improvement, home purchase, and home refinance loans to moderate-income geographies was 24, 29, and 26 percent, respectively. This exceeded area demographics which indicate that 22 percent of all owner-occupied housing is located in moderate-income tracts. In 2003, performance is good. The distribution of home purchase and refinance loans is above demographics. However, there were no home improvement loans made in moderate-income areas.

Distribution in the one low-income tract is poor. UMB did not originate any home mortgage loans in this tract over the evaluation period. This did not adversely impact the bank's rating as lending opportunities in low-income areas are very limited. Less than 1 percent of owner-occupied housing units are located in the low-income tract.

A geographical analysis of multifamily loans is not meaningful. UMB made two loans during the evaluation period.

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

Refer to Table 6 in the State of Kansas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Overall, the geographic distribution of small loans to businesses is excellent in 2004-2006. Performance in moderate-income tracts is excellent. Twenty percent of all businesses are located in moderate-income geographies. Twenty percent of all reportable loans were originated to businesses located in moderate-income geographies. In 2003, performance is adequate.

Performance in low-income areas is also excellent in 2004-2006. Fifteen percent of the bank's reportable loans were originated in low-income geographies. Demographics indicate that 14 percent of all businesses are located in the low-income geography. In 2003, performance is good and the percentage of bank loans is near to demographics. Market share in the low-income tract exceeds the bank's overall market share of loans to small businesses.

### ***Lending Gap Analysis***

Our geographic distribution analysis included a review for lending gaps, particularly in moderate-income areas. We did not identify any conspicuous lending gaps in the Topeka AA.

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

We performed an analysis of the inside/outside ratio by state. In the state of Kansas, over 80 percent of loans are within the AAs.

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

The overall distribution of loans by borrower income level is excellent.

#### ***Home Mortgage Loans***

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

The distribution of home mortgage loans to borrowers of different income levels is excellent in 2004-2006. The bank's pattern of lending to moderate-income borrowers is excellent. Area demographics indicate that 15 percent of all families are moderate-income. The distribution of home improvement, home purchase, and home refinance loans to moderate-income borrowers was 29 percent, 26 percent, and 26 percent, respectively. The bank's performance significantly exceeds demographics. In 2003, performance is good. The distribution of home improvement and refinance loans exceeds demographics. However, the distribution of home purchase loans is poor.

Performance with low-income borrowers is also excellent in 2004-2006. Six percent of families have incomes below the poverty level. Area demographics indicate that 13 percent of all families are low-income. The low-income distributions for home purchase and refinancing loans exceed area demographics at 17 percent and 15 percent, respectively. Distribution of home improvement loans is reasonable when compared to demographics with 10 percent of reportable loans originated to low-income borrowers. In 2003, performance is adequate. The distribution of home purchase and home improvement loans exceeds demographics. The distribution of refinance loans, which make up 50 percent of home mortgage loans in 2003, is poor.

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

Refer to Table 11 in the State of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes is excellent in 2004-2006. Sixty percent of all businesses for whom income information was available reported income of \$1 million or less. Similarly, 60 percent of the bank's reportable loans were made to small businesses. In 2003, the distribution of loans is also excellent and exceeds demographics. The market share for loans to small businesses exceeds the bank's overall market share for loans to small businesses.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the State of Kansas section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

Our analysis gave neutral consideration to community development lending activities. UMB did not report any community development loans within the Topeka MA.

### **Product Innovation and Flexibility**

UMB offers several programs that use flexible or innovative underwriting to assist low- and moderate-income individuals or geographies. Most notable are its home improvement and home purchase lending programs, which generally offer below market rates and further subsidies of interest rates or closing costs through public and private partnerships. The success of these programs is evidenced in the bank's overall excellent borrower distribution of home mortgage lending.

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

Based on limited-scope reviews, the bank's performance in 2004-2006 under the lending test in the Wichita and Lawrence AAs and in the combined non-metropolitan areas is not inconsistent with the bank's overall "Outstanding" performance under the lending test in Kansas. In 2003, the bank's performance in the Wichita AA is not inconsistent with the overall rating. However, in the Lawrence and combined non-metropolitan areas, performance is weaker than the bank's overall performance in the state. In the Lawrence AA, the overall geographic distribution of loans is adequate and the borrower distribution of loans is good. In the combined non-metropolitan areas, the geographic distribution of loans is good. This performance does not impact the overall conclusions.

## **INVESTMENT TEST**

The bank's performance under the investment test in Kansas is rated "Outstanding." Based on a full-scope review, the bank's performance in the Topeka AA is good. Based on limited-scope reviews, the bank's performance in the Wichita and Lawrence MAs, and the non-MA combined AA is stronger than the bank's performance in the Topeka MA and had a positive impact on the bank's overall Investment Test rating for the state of Kansas. Refer to Table 14 in the state of Kansas section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

UMB provided \$512,000 in qualified investments and donations in the Topeka AA during the current assessment period. Investments address community development needs, including community services for low- and moderate-income individuals and affordable housing.

Significant qualified investments and donations occurring during the evaluation period are as follows:

- \$490,000 invested in mortgage backed securities that were made to low- and moderate-income borrowers in the Topeka AA; and,
- \$15,000 in donations to an organization that provides physical, occupational, and speech-language therapy to low- and moderate-income individuals.

### **Conclusion for Areas Receiving Limited Scope Review**

Based on limited-scope reviews, the bank's performance under the investment test in the Lawrence and Wichita MAs, and the combined non-MA is not inconsistent with the bank's overall "Outstanding" performance. The bank provided a combined total of \$3.3 million, including prior period investments of \$2 million in qualified investments and donations in the limited scope AAs during this evaluation period. Combined limited-scope AAs represents 55 percent of deposits in the state of Kansas.

## **SERVICE TEST**

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

The bank's performance under the service test in Kansas is rated "Outstanding." Based on a full-scope review, the bank's performance in the Topeka AA is excellent. Refer to Table 15 in the state of Kansas section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

### **Retail Banking Services**

UMB's service delivery systems are readily accessible to geographies and individuals of different income levels in the Topeka AA. The level of community development services provided by bank staff is adequate.

The distribution of branches and ATMs in moderate-income tracts exceeds the percentage of population residing in those tracts. There are no branches in low-income tracts. However, there is only one low-income geography in the AA and less than 2 percent of the population resides in this tract. Therefore, more weight is placed on performance in moderate-income geographies. There is one ATM in a low-income tract. UMB has not opened or closed any branches in the Topeka AA during the evaluation period.

There is no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences the AA, particularly low- and moderate-income geographies and individuals. Drive-up facilities offer extended hours Monday through Friday, and ATMs offer 24-hour service.

Refer to the Service Test comment for the Kansas City AA for details on other alternative delivery systems offered by UMB.

### **Community Development Services**

UMB provided an adequate level of community development services in the Topeka AA.

UMB bank staff provided their financial expertise to four different organizations that promote community development initiatives in the AA. Three organizations provide community services targeted to low- and moderate-income individuals. The other organization helps revitalize and stabilize low- and moderate-income geographies.

Refer to the Service Test comment for the Kansas City AA for detail on community development services offered by UMB via Electronic Transfer Accounts and Temporary Aid to Needy Families.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Wichita MA and the combined non-MA AAs is not inconsistent with the bank's overall "Outstanding" performance under the Service Test in Kansas. In the Lawrence MA, performance is weaker than the bank's overall performance in the state. Performance is weaker because there are no branches in low- or moderate-income tracts. However, the Lawrence MA represents less than 10 percent of deposits in the state with only one branch and does not have a negative impact on the overall Service Test rating.

# State Rating

## State of Oklahoma

### CRA Rating for Oklahoma<sup>5</sup>: Outstanding

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: Low Satisfactory

The major factors that support this rating include:

- UMB demonstrates excellent performance in lending to low- and moderate-income geographies and to low- and moderate-income individuals and small businesses. The level of community development lending is high and positively impacted the bank's lending performance.
- Performance under the investment test is excellent. UMB made qualified investments and charitable contributions totaling \$1.1 million to agencies that provide community services to low- and moderate-income individuals. These contributions positively impacted the identified needs of the AA.
- Branch distribution is reasonably accessible to geographies and individuals of different income levels.

## Description of Institution's Operations in Oklahoma

UMB operates five branches and seven ATMs within two AAs in the State of Oklahoma. The Oklahoma AAs include two metropolitan areas: Oklahoma City and Tulsa. Three percent of the bank's total deposits and 4 percent of loan originations (by number) are attributed to the AAs in the State of Oklahoma. Business loans are the primary credit products in the AAs.

UMB ranks 25<sup>th</sup> in deposit market share among 79 financial institutions operating in the Oklahoma AAs. Deposits in the Oklahoma AAs total \$174 million and represent approximately a 1 percent market share. Market share leaders include Bank Of Oklahoma, MidFirst Bank, and Bank of America with 20 percent, 11 percent, and 9 percent of the market respectively.

Refer to the market profile for the Oklahoma City MA in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

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<sup>5</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.



## **Scope of Evaluation in Oklahoma**

We evaluated the bank's performance in the State of Oklahoma by performing a full-scope review of the Oklahoma City AA and a limited review of the Tulsa AA. The state rating is based primarily on the performance in the Oklahoma City AA.

The Oklahoma City AA represents 79 percent of loan originations (by number) in the state. UMB operates four branch offices in the AA.

We conducted one community contact in the Oklahoma City AA with a representative of the Neighborhood Services Department for Oklahoma City. Primary credit needs identified by this contact include rehabilitation of older housing, improving inter-city schools, and affordable housing.

Refer to the performance tables in appendix A for additional information.

## **LENDING TEST**

The bank's performance under the Lending Test is rated "Outstanding". Refer to Table 1 Lending Volume in the state of Oklahoma section of appendix D for the facts and data used to evaluate the bank's lending activity.

Our analysis in the Oklahoma City AA gave the most weight to small loans to businesses, followed by home mortgage products. Small loans to businesses and home mortgages respectively represent 80 percent and 19 percent of the bank's reported loans (by number) over the evaluation period. An evaluation of small loans to farms was not performed since this type of lending represents less than 1 percent of the reported loans in the Oklahoma City AA. Small farm loans are not an identified credit need for this predominately metropolitan area.

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

Based on a full-scope review, the bank's performance in the Oklahoma City AA is rated "Outstanding".

### **Lending Activity**

Lending performance reflects good responsiveness in relation to area credit needs and the bank's deposit market share. UMB has a deposit market share of 1 percent, which ranks 17<sup>th</sup> in the Oklahoma City AA. Of all CRA data reported in the Oklahoma City AA for the year 2005, UMB ranked 17<sup>th</sup> in loans to small businesses.

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

The overall geographic distribution of loans is excellent.

### ***Home Mortgage Loans***

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

The geographic distribution of reported home mortgage loans is excellent in 2004-2006. Area demographics indicate that 28 percent of owner-occupied housing units are located in moderate-income geographies. Of the total home purchase, home improvement, and home refinance loans originated by the bank, 43 percent, 60 percent, and 44 percent, respectively, was originated in moderate-income geographies. In 2003, performance is adequate in moderate-income geographies. The distribution of refinance loans, which represent 64 percent of originations, is adequate. The distribution of home improvement loans exceeds demographics and the distribution of home purchase loans is poor.

The geographic distribution of reported home mortgage loans in low-income geographies is also excellent in 2004-2006. Area demographics indicate that 3 percent of owner-occupied units are located in low-income geographies. Of the total home purchase, home improvement, and home refinance loans originated by the bank, 5 percent, 10 percent, and 5 percent, respectively, was originated in low-income geographies. In 2003, UMB did not make any loans in low-income geographies. Performance is considered adequate given the demographics.

A geographical analysis of multifamily loans is not meaningful. There were no multifamily loans originated during the evaluation period.

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

Refer to Table 6 in the State of Oklahoma section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent in 2004-2006. Distribution in moderate-income geographies, at 26 percent, is similar to area demographics which indicate that 29 percent of all businesses are located in moderate-income geographies. Distribution in low-income tracts at 22 percent, significantly exceeds demographic information that indicates only 6 percent of all area businesses are located in low-income geographies. In 2003, the distribution of loans in low- and moderate-income tracts is adequate.

### ***Lending Gap Analysis***

Our geographic distribution analysis included a review for lending gaps, particularly in low- and moderate-income areas. We did not identify any unexplained conspicuous gaps in the Oklahoma City AA.

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

We performed an analysis of the inside/outside ratio by state. In the state of Oklahoma, over 75 percent of loans are within the AAs.

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

The overall distribution of loans by borrower income level is excellent.

### ***Home Mortgage Loans***

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

The distribution of home mortgage loans to borrowers of different income levels is good in 2004-2006. The bank's pattern of lending to moderate-income borrowers is good. Area demographics indicate that 18 percent of families report moderate-income levels. Penetration of home purchase and home refinance loans to moderate-income families was 14 percent and 25 percent, respectively. The bank did not originate any home improvement loans to moderate-income borrowers. In 2003, performance is excellent. The distribution of home purchase, home improvement, and refinance loans exceeds demographics.

The bank's practice of lending to low-income borrowers is excellent in 2004-2006 considering the percentage of families below the poverty level. Area demographics indicate that 22 percent of families report low-income levels. Twelve percent of families have incomes below the poverty level. Penetration of home purchase and home refinance loans to low-income families was 16 percent and 19 percent, respectively. The bank's percentage of home improvement loans is excellent and exceeds demographics. In 2003, the bank's overall performance is adequate. The distribution of refinance loans is good considering the poverty level. UMB did not make any home purchase or home improvement loans to low-income borrowers.

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

Refer to Table 11 in the State of Oklahoma section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes is excellent in 2004-2006. Sixty-two percent of all businesses for whom revenue information was available report revenues of \$1 million or less. Sixty-eight percent of the bank's reported loans were to small businesses. In 2003, the distribution of loans is also excellent and exceeds demographics. The market share of loans to small businesses exceeds the bank's overall market share.

### ***Community Development Lending***

Refer to Table 1 Lending Volume in the State of Oklahoma section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

Our analysis gave positive consideration to community development lending activities. UMB originated one community development loan totaling \$2.68 million in the Oklahoma City AA.

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

Based on a limited-scope review, the bank's performance in 2004-2006 under the lending test in the Tulsa AA is weaker than the bank's overall "Outstanding" performance under the lending test in Oklahoma. In 2003, performance in the Tulsa AA is also weaker than the bank's overall performance in the state. The distribution of small business loans to businesses with revenues of \$1 million or less is adequate. Performance does not impact the overall conclusions.

### **Product Innovation and Flexibility**

UMB offers several programs that use flexible or innovative underwriting to assist low- and moderate-income individuals or geographies. Most notable are its home improvement and home purchase lending programs, which generally offer below market rates and further subsidies of interest rates or closing costs through public and private partnerships. The success of these programs is evidenced in the bank's overall excellent borrower distribution of home mortgage lending.

## **INVESTMENT TEST**

The bank's performance under the investment test in Oklahoma is rated "Outstanding." Based on a full-scope review, the bank's performance in the Oklahoma City AA is excellent. Refer to Table 14 in the state of Oklahoma section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

UMB provided \$1.1 million in qualified investments and donations during the current evaluation period. Investments address community development needs, including affordable housing and educational and social services targeted to low- and moderate-income individuals.

Significant qualified investments occurring during this evaluation period are listed below.

- Purchase of \$675,000 of bonds used to renovate local, public schools. Bonds were issued as a part of a city approved empowerment zone, where school renovations were seen as a key aspect of revitalizing the city's older neighborhoods;
- Purchase of a \$220,000 bond issued to an agency that provides affordable housing tax credits; and,
- Donations of \$7,000 to an organization that facilitates funding for local charities.

## **Conclusions for Areas Receiving Limited-Scope Review**

Based on a limited scope review, the bank's performance under the investment test in the Tulsa AA is not inconsistent with the bank's overall "Outstanding" performance. The bank provided \$399,000 in qualified investments and donations in the Tulsa AA during this evaluation period.

## **SERVICE TEST**

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

The bank's performance under the service test in Oklahoma is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Oklahoma City AA is adequate. Refer to Table 15 in the state of Oklahoma section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

### **Retail Banking Services**

UMB's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the Oklahoma City AA. Bank staff provides an adequate level of community development services.

The distribution of branches and ATMs in low-income tracts exceeds the percentage of population residing in those tracts. There are no branches or ATMs in the moderate-income tracts where 36 percent of the population resides. However, one of the five branches in middle- or upper-income tracts is adjacent to a moderate-income tract. In addition, there are two branches in tracts with no income level designation adjacent to low- and moderate-income tracts. These branches help provide reasonable access to residents in these geographies. UMB did not open any branches and closed one branch in an upper-income area during the evaluation period. The branch closing did not adversely affect the accessibility of the bank's delivery systems.

There is no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and individuals. Drive-up facilities offer extended hours on Monday - Saturday. ATMs offer 24-hour service.

Refer to the Service Test comment for the Kansas City AA for details on other alternative delivery systems offered by UMB.

### **Community Development Services**

UMB provided an adequate level of community development services in the Oklahoma City AA.

UMB bank staff provided their financial expertise to four different organizations that promote community development initiatives in the AA. Two organizations provide community services targeted to low- and moderate-income individuals. The other two organizations promote economic development by funding small businesses.

Refer to the Service Test comment for the Kansas City AA for details on community development services offered by UMB via Electronic Transfer Accounts and Temporary Aid to Needy Families.

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

Based on a limited-scope review, the bank's performance under the service test in the Tulsa AA is weaker than performance noted in areas receiving full-scope review. Performance is weaker because there are no branches in low- or moderate-income tracts. In the Tulsa AA, 27 percent of the population resides in low- and moderate-income geographies. However, this AA represents only 8 percent of deposits in the state with one branch location. This performance did not have a negative impact on the overall rating for the state.

# State Rating

## State of Nebraska

### CRA Rating for Nebraska<sup>6</sup>: Satisfactory

The lending test is rated: **Low Satisfactory**

The investment test is rated: **Outstanding**

The service test is rated: **Needs Improvement**

The major factors that support this rating include:

- UMB originated an exceptionally high level of community development loans, which had a positive impact on the lending test rating. Excellent CD lending offsets the poor geographic and borrower distribution of loans.
- Performance under the investment test is excellent. UMB made qualified investments and charitable contributions totaling \$1.1 million to agencies that provide community services to low- and moderate-income individuals. These contributions positively impacted the identified needs of the AA.
- Branch distribution is unreasonably inaccessible to portions of its assessment area, particularly to low- and moderate-income geographies or to low- and moderate-income individuals.

### Description of Institution's Operations in Nebraska

UMB operates three branches and five ATMs in AA. The Omaha AA includes two counties of the Omaha multi-state MSA. Less than one-half of 1 percent of the bank's total deposits and 2 percent of loan originations (by number) are attributed to this AA. Small business loans are the primary credit product, representing 91 percent of all UMB loan originations (by number and dollar volume) in the state.

UMB ranks 22<sup>nd</sup> in deposit market share among 34 financial institutions operating in the Omaha AA. Deposits in the Omaha AA total \$30 million or 0.5 percent of UMB's total deposits, and represent approximately 0.25 percent of the market. Market share leaders include First National Bank of Omaha, Wells Fargo Bank, and U.S. Bank with 38 percent, 12 percent, and 9 percent of the market respectively.

Refer to the market profile for the Omaha AA in appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

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<sup>6</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

## **Scope of Evaluation in Nebraska**

We evaluated the bank's performance in the State of Nebraska by performing a full-scope review of the Omaha AA. The state rating is based on the performance in this AA.

We conducted one community contact in the Omaha AA with the director of a community family service agency. Our contact identified affordable housing and consumer loans as the primary credit needs.

Refer to the performance tables in appendix A for additional information.

## **LENDING TEST**

The bank's performance under the Lending Test is rated "Low Satisfactory". The rating for the State of Nebraska did not have a significant impact the overall Lending Test rating due to total assets in the Omaha AA representing less than 1 percent of UMB's total assets. Refer to Table 1 Lending Volume in the State of Nebraska section of appendix D for the facts and data used to evaluate the bank's lending activity.

Our analysis in the Omaha AA gave the most weight to small loans to businesses and community development lending. Loans to small businesses represent 89 percent of the number of reported loans over the evaluation period. We did not perform an analysis of home mortgage or small farm lending. Given the low volume of home mortgage lending activity, an analysis would not produce meaningful information. Loans to small farms represent only 2 percent of the reported loans in the Omaha AA. Small farm loans are not an identified credit need for this predominately metropolitan area.

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

Based on a full-scope review, the bank's performance in the Omaha AA is adequate.

### **Lending Activity**

Lending levels reflect good responsiveness in relation to area credit needs and the bank's deposit market share. UMB has a deposit market share of less than 1 percent, which ranks 22<sup>nd</sup> in the Omaha AA. Of all CRA data reported in the Omaha AA for the year 2005, UMB ranked 18<sup>th</sup> in small business loans.

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

The overall geographic distribution of loans is poor.

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

Refer to Table 6 in the State of Nebraska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.



The geographic distribution of small loans to businesses is poor. Businesses located in low- and moderate-income geographies represent 2.5 percent and 19 percent, respectively. Bank performance is significantly below demographics. Market share data is not meaningful.

### ***Lending Gap Analysis***

Our geographic distribution analysis included a review for lending gaps, particularly in low- and moderate-income areas. We did not identify any unexplained conspicuous gaps in the Omaha AA.

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

We performed an analysis of the inside/outside ratio by state. A substantial majority of the loans were originated within the bank's defined AAs. Refer to the Scope of the Evaluation section for additional details.

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

The overall distribution of loans by borrower income level is poor.

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

Refer to Table 11 in the State of Nebraska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes is poor. Demographic data indicates that 63 percent of all businesses for whom revenue information is available report revenue of \$1 million or less. The bank's practice of lending indicates that only 31 percent of all reported business loans were originated to small businesses. The market share of loans to small businesses is adequate compared to the bank's overall market share.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the State of Nebraska section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

UMB originated an exceptionally high level of community development loans, which had a positive impact on the lending test rating. UMB originated eight community development loans to small businesses totaling \$35 million. Each loan supported economic development by supporting businesses that employ low- and moderate-income individuals.

## **INVESTMENT TEST**

The bank's performance under the investment test in Nebraska is rated "Outstanding." Based on a full-scope review, the bank's performance in the Omaha MA is excellent. Refer to Table 14 in the state of Nebraska section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

UMB provided \$1.1 million in qualified investments and donations during the current assessment period. Investments address community development needs, including community services targeted to low- and moderate-income individuals and affordable housing.

Significant qualified investments occurring during the evaluation period are listed below:

- \$1 million invested in mortgage backed securities that were made to low- and moderate-income borrowers in the Omaha MA; and,
- \$20,000 in donations to an organization that provides emergency shelters for abused and neglected children, sanctuary for women and children who are victims of domestic abuse, and emergency services for the homeless.

## **SERVICES TEST**

The bank's performance under the service test in Nebraska is rated "Needs To Improve". Based on a full-scope review, the bank's performance in the Omaha AA is poor. Refer to Table 15 in the state of Nebraska section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

### **Retail Banking Services**

UMB's service delivery systems are unreasonably inaccessible to portions of its assessment area, particularly to low- and moderate-income geographies or to low- and moderate-income individuals in the Omaha AA. The level of community development services provided by bank staff is adequate.

UMB has no branches or ATMs in low- or moderate income tracts. Twenty-eight percent of the population resides in these tracts. UMB opened three branches and closed four branches in the Omaha AA during the evaluation period. Two branches were opened in middle-income tracts and one branch was opened in an upper-income tract. All branch closings were in upper-income tracts. Branch openings and closings did not adversely affect the accessibility of the bank's delivery systems.

There are no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences the AA, particularly low- and moderate-income geographies and individuals. Drive-up facilities offer extended hours Monday through Friday, and ATMs offer 24-hour service.

Refer to the Service Test comment for the Kansas City AA for details on other alternative delivery systems offered by UMB.

### **Community Development Services**

UMB provided an adequate level of community development services in the Omaha AA.

UMB bank staff provided their financial expertise to two different organizations that provide community services targeted to low- and moderate-income individuals.

Refer to the Service Test comment for the Kansas City AA for detail on community development services offered by UMB via Electronic Transfer Accounts and Temporary Aid to Needy Families.



## Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS: UMB Bank, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
UMB Bank, N.A.	Outstanding	Outstanding	Low Satisfactory	Outstanding
Multistate Metropolitan Area or State:				
Kansas City MA	Outstanding	Outstanding	Low Satisfactory	Outstanding
St. Louis MA	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Missouri	Outstanding	High Satisfactory	High Satisfactory	Outstanding
State of Kansas	Outstanding	Outstanding	Outstanding	Outstanding
State of Oklahoma	Outstanding	Outstanding	Low Satisfactory	Outstanding
State of Nebraska	Low Satisfactory	Outstanding	Needs Improvement	Satisfactory

(\*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

# Appendix C: Market Profiles for Full-Scope Areas

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

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## Kansas City, MO-KS MA #28140

Demographic Information for Full Scope Area: Kansas City MA (FS)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	466	9.66	25.32	37.34	25.11	2.58
Population by Geography	1,603,727	5.32	19.93	44.72	30.01	0.02
Owner-Occupied Housing by Geography	426,225	3.32	16.21	46.12	34.34	0.00
Business by Geography	108,738	4.07	17.86	43.86	33.05	1.16
Farms by Geography	2,633	1.41	11.77	52.68	33.95	0.19
Family Distribution by Income Level	423,120	18.08	18.42	23.44	40.06	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	154,419	9.82	30.80	45.49	13.89	0.00
Median Family Income	= \$55,031					
HUD Adjusted Median Family Income for 2005	= \$65,400					
Households Below Poverty Level	= 8%					
			Median Housing Value		= \$108,254	
			Unemployment Rate (2000 US Census) = 2.29%			

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

Source: 2000 US Census and 2005 HUD updated MFI

The Kansas City AA consists of six contiguous counties in the Kansas City MA. These counties are Cass, Clay, Jackson, and Platte in Missouri; and Johnson and Wyandotte in Kansas. Low- and moderate-income tracts are predominately located in Jackson and Wyandotte Counties. The delineation of the AA complies with the regulation and does not arbitrarily exclude any low- and moderate-income areas. The Kansas City AA has 466 census tracts, which are designated 10 percent low-income, 25 percent moderate-income, 37 percent middle income, 25 percent upper-income, and 3 percent NA.

The economic conditions in the AA are stable. The February 2007 area unemployment rate is 5.5 percent compared to the state average of 5.7 percent and the national rate of 4.4 percent for the same time-period. Varied employment industries in Kansas City include telecommunications, manufacturing, health care, financial services, engineering, and agribusiness. Major employers include H&R Block, AT&T, DST Systems, Hallmark Cards, Inc., Sprint Corporation, and State and Federal governments.

We performed one community contact and reviewed other recent community contacts in this AA. The purpose of the community contacts was to obtain a profile of the community, identify community development needs and opportunities, and to assess perceptions of the performance of local financial institutions. The community contacts identified affordable housing, redevelopment of older areas, and access to general banking services for low- and moderate-income persons as primary community needs. Opportunities to participate in community development activities are readily available in this AA. Community contacts indicated local banks are receptive to community needs.

## St. Louis, MO-IL MA #41180

Demographic Information for Full Scope Area: St Louis MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	489	11.25	24.34	40.49	23.11	0.82
Population by Geography	2,361,509	6.27	20.58	45.63	27.52	0.01
Owner-Occupied Housing by Geography	651,763	3.33	17.41	48.72	30.53	0.00
Business by Geography	144,402	5.31	18.73	42.89	32.72	0.35
Farms by Geography	3,571	1.43	10.36	61.27	26.88	0.06
Family Distribution by Income Level	620,572	19.34	17.97	22.17	40.51	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	231,558	11.45	31.07	44.65	12.83	0.00
Median Family Income	= \$53,435		Median Housing Value		= \$107,339	
HUD Adjusted Median Family Income for 2005	= \$63,800		Unemployment Rate (2000 US Census)		= 2.89%	
Households Below Poverty Level	= 10%					

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

Source: 2000 US Census and 2005 HUD updated MFI

The St. Louis AA consists of St. Louis City and five contiguous counties in the St. Louis MA. These counties are Jefferson, St. Charles, and St. Louis in Missouri; and Madison and St. Clair in Illinois. The delineation of the AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas. The St. Louis AA has 489 census tracts, which are designated 11 percent low-income, 24 percent moderate-income, 41 percent middle income, 23 percent upper-income, and 1 percent NA.

Economic conditions in the AA are stable. The February 2007 area unemployment rate of 5.7 percent mirrors the state average. Varied employment industries in the St. Louis MA include aviation, biotechnology, food and beverage manufacturing, telecommunications, and transportation. St. Louis is the headquarters for 19 Fortune 1000 companies, and boasts three of the nation's 100 fastest growing companies. Major employers include Anheuser-Busch Company, Scott Air Force Base, Boeing International Defense Systems, SBC Communications, and State and Federal governments.

We preformed one community contact and reviewed other recent community contacts in this AA. The purpose of the community contacts was to obtain a profile of the community, identify community development needs and opportunities, and to assess perceptions of the performance of local financial institutions. The community contacts identified home purchase loans and home improvement loans as the primary credit needs of the community. Opportunities to participate in community development activities are readily available in this AA. Community contacts indicated local banks were actively seeking to meet the credit needs of the community.



# State of Missouri

## St. Joseph MA #41140

Demographic Information for Full Scope Area: St. Joseph MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	30	0.00	16.67	60.00	23.33	0.00
Population by Geography	102,490	0.00	12.94	54.09	32.97	0.00
Owner-Occupied Housing by Geography	27,673	0.00	9.14	58.32	32.55	0.00
Business by Geography	6,167	0.00	17.58	45.44	36.99	0.00
Farms by Geography	454	0.00	2.64	66.52	30.84	0.00
Family Distribution by Income Level	26,719	18.15	18.03	23.78	40.04	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	9,667	0.00	18.50	60.25	21.26	0.00
Median Family Income	= \$42,411		Median Housing Value		= \$76,767	
HUD Adjusted Median Family Income for 2005	= \$51,300		Unemployment Rate (2000 US Census)		= 2.66%	
Households Below Poverty Level	= 12%					

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

Source: 2000 US Census and 2005 HUD updated MFI

The St. Joseph AA consists of Buchanan and Andrews counties, which make up a significant portion of the St. Joseph MA. The St. Joseph AA is located along the Missouri River in Northwestern Missouri. The AA is contiguous with Buchanan County on the northern part of the AA and Andrews County to the south. The AA complies with all aspects of the regulation and does not arbitrarily exclude any low- or moderate-income areas. The St. Joseph AA has 30 census tracts, which are designated 17 percent moderate-income, 60 percent middle-income, and 23 percent upper-income. There are no low-income tracts in the St. Joseph AA.

Economic conditions in St. Joseph are stable. The February 2007 unemployment rate for the AA is 5.3 percent, slightly below the statewide average of 5.7 percent. The local economy is supported by a diverse collection of industries including education and health care services, animal pharmaceutical production, manufacturing, and riverboat gaming. Major employers in the St. Joseph AA include Heartland Health, St. Joseph School District, American Family Insurance, Sara Lee Foods, and Missouri Western State College.

We preformed one community contact and reviewed other recent community contacts in this AA. The purpose of these community contacts was to obtain a profile of the community, identify community development needs and opportunities, and to assess perceptions of the performance of local financial institutions. The community contacts identified affordable housing, specifically home purchases, as the primary credit need of this area. Area financial institutions actively seek to meet the credit needs of the communities.

# State of Kansas

## Topeka MA #45820

Demographic Information for Full Scope Area: Topeka MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	41	2.44	31.71	39.02	26.83	0.00
Population by Geography	169,871	1.72	26.54	40.50	31.24	0.00
Owner-Occupied Housing by Geography	46,522	0.65	21.77	41.36	36.23	0.00
Business by Geography	11,744	13.82	20.33	39.83	26.01	0.00
Farms by Geography	337	3.26	12.17	51.04	33.53	0.00
Family Distribution by Income Level	45,166	13.32	15.07	21.62	49.99	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	12,824	2.90	43.46	36.67	16.97	0.00
Median Family Income	= \$50,488		Median Housing Value		= \$76,473	
HUD Adjusted Median Family Income for 2005	= \$57,800		Unemployment Rate (2000 US Census)		= 2.09%	
Households Below Poverty Level	= 10%					

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

Source: 2000 US Census and 2005 HUD updated MFI

The Topeka AA consists of Shawnee County, part of the Topeka MSA. Topeka, the state capital of Kansas, is located approximately 70 miles west of Kansas City, MO. The delineation of the AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas. The Topeka AA has 41 census tracts, which are designated 2 percent low-income, 32 percent moderate income, 39 percent middle-income, and 27 percent upper-income.

The Topeka economy is dependent on governmental jobs for its employment stability, with nearly 25 percent of the workforce employed by state, county, or city governments. Education and health care services, manufacturing, and shipping and distribution sector employment provide some diversity to the local economy. The February 2007 unemployment rate for the Topeka MSA was 5.5 percent, higher than the statewide average of 4.7 percent. Significant employers in the Topeka AA include the State of Kansas, Stormont-Vail Health Care, Payless Shoe Source, Burlington Northern Santa Fe Railway, and the local public school district.

We performed one community contact in this AA. The purpose of this community contact was to obtain a profile of the community, identify community development needs and opportunities, and to assess perceptions of the performance of local financial institutions. The community contact identified credit counseling and innovative home improvement lending to low- and moderate-income individuals as primary credit needs. Opportunities to participate in community development activities are available in this AA. He indicated local financial institutions were adequately meeting the credit needs of the community.

## State of Oklahoma

### Oklahoma City MA #36420

Demographic Information for Full Scope Area: Oklahoma City MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	227	8.81	36.56	30.40	22.47	1.76
Population by Geography	660,448	4.62	35.85	31.89	27.55	0.09
Owner-Occupied Housing by Geography	161,158	2.81	28.33	34.78	34.08	0.00
Business by Geography	50,490	6.13	29.01	32.06	29.37	3.43
Farms by Geography	789	3.93	20.03	33.33	41.44	1.27
Family Distribution by Income Level	171,849	22.30	18.43	20.85	38.42	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	69,988	7.43	48.26	30.68	13.64	0.00
Median Family Income	= \$44,898		Median Housing Value	= \$77,700		
HUD Adjusted Median Family Income for 2005	= \$52,350		Unemployment Rate (2000 US Census)	= 2.53%		
Households Below Poverty Level	= 14%					

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

Source: 2000 US Census and 2005 HUD updated MFI

The Oklahoma City AA is comprised of Oklahoma County. Oklahoma City, the state capital, is located in the central part of the state. The delineation of the AA complies with the regulation and does not arbitrarily exclude any low- or moderate income areas. The Oklahoma City AA has 227 census tracts, which are designated 9 percent low-income, 37 percent moderate-income, 30 percent middle income, 23 percent upper-income, and 2 percent NA.

Economic conditions in Oklahoma County are robust and the outlook continues to be good, with the energy sector providing significant employment and income growth. In addition to employment in the energy field, agriculture, aviation, health care, and governmental jobs contribute to a diversified economy. The February 2007 unemployment rate for the Oklahoma City MSA was 4.3 percent, slightly lower than the statewide and nationwide averages of 4.4 percent. Significant employers in the AA include the University of Oklahoma, Tinker Air Force Base, INTEGRIS Baptist Medical Center, General Motors Corp., and State and Federal governments.

We performed one community contact and reviewed other recent community contacts in this AA. The purpose of these community contacts was to obtain a profile of the community, identify community development needs and opportunities, and to assess perceptions of the performance of local financial institutions. The community contacts identified affordable housing, small business lending, and financial literacy and credit counseling programs as the primary credit needs of the community. Opportunities to participate in community development activities are available in this AA. Community contacts indicated financial institutions are meeting the credit needs of the community.

## State of Nebraska

### Omaha MA #36540

Demographic Information for Full Scope Area: Omaha MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	180	3.89	25.56	42.78	27.78	0.00
Population by Geography	586,180	2.57	25.11	43.94	28.37	0.00
Owner-Occupied Housing by Geography	145,257	1.31	18.58	46.71	33.39	0.00
Business by Geography	37,418	2.47	19.27	46.25	32.01	0.00
Farms by Geography	1,063	0.47	10.82	49.39	39.32	0.00
Family Distribution by Income Level	149,474	17.04	18.37	23.98	40.62	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	52,919	4.30	39.69	43.25	12.77	0.00
Median Family Income HUD Adjusted Median Family Income for 2005 Households Below Poverty Level	= \$53,955 = \$64,550 = 8%	Median Housing Value Unemployment Rate (2000 US Census) = 1.98%		= \$106,847		

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

Source: 2000 US Census and 2005 HUD updated MFI

The Omaha AA is comprised of Douglas and Sarpy Counties. The delineation of the AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas. The Omaha AA has 180 census tracts, which are designated 4 percent low-income, 26 percent moderate-income, 43 percent middle income, and 28 percent upper-income.

The local economy is stable. Omaha serves as a regional service and trade center. The local economy is diversified through industries that include communications, health care, data processing, transportation, education, and state and federal governments. The February 2007 unemployment for the Omaha MSA was 3.7 percent, exceeding the statewide average of 3.3 percent but still better than the nationwide average of 4.4 percent. Major employers in the area include Offutt Air Force Base, Alegent Health, Nebraska Medical Center, First National Bank of Omaha, First Data Corp., and Omaha Public Schools.

We performed one community contact and reviewed other recent community contacts in this AA. The purpose of these community contacts was to obtain a profile of the community, identify community development needs and opportunities, and to assess perceptions of the performance of local financial institutions. The community contacts identified affordable housing and consumer loans as the primary credit needs. Opportunities to participate in community development activities are available in this AA. Community contacts indicated financial institutions are meeting the credit needs of the community.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

One set of tables contains information for all states within the bank's assessment area. All multistate metropolitan areas are also presented in the 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. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

The following is a listing and brief description of the tables included in each set:

- 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 in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Community Development Loans" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of Assessment Area" is used ONLY if the bank has otherwise adequately met the CD lending needs of its assessment area.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, 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 in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of the Assessment Area" is used ONLY if the bank has otherwise adequately met the qualified investment needs of its assessment area.

**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.

## Bank, N.A. 23920

Table 1. Lending Volume

LENDING VOLUME		Geography: MO/KS/OK/NE						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006				
MA/Assessment Area (2005):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Multistate MAs:</b>												
Kansas City MA (FS)	100.00	2,850	138,245	3,338	584,869	49	4,820	155	434,000	6,392	1,161,934	100.00
St Louis MA (FS)	100.00	2,655	60,485	1,046	157,338	10	855	148	274,000	3,859	492,678	100.00
<b>Missouri:</b>												
St Joseph (FS)	10.51	251	13,583	125	14,909	39	838	1	4,500	416	33,830	16.37
Joplin MA (LS)	14.18	200	12,080	209	16,241	151	4,162	0	0	560	32,483	10.56
Springfield MA (LS)	8.13	140	7,297	170	23,152	11	662	0	0	321	31,111	9.30
Columbia MA (LS)	8.26	113	8,002	178	14,600	35	2,647	0	0	326	25,249	10.31
Jefferson City MA (LS)	3.42	50	3,865	84	10,586	1	100	0	0	135	14,551	5.67
Combined NonMA AAs (LS)	55.51	551	33,379	491	35,249	1,150	44,983	0	0	2,192	113,611	47.79
<b>Kansas:</b>												
Topeka MA (FS)	20.56	203	12,530	169	16,604	3	84	0	0	375	29,218	44.71
Wichita MA (LS)	26.37	102	2,151	376	51,458	3	132	0	0	481	53,741	12.11
Lawrence MA (LS)	6.47	43	3,702	75	9,245	0	0	0	0	118	12,947	9.36
Combined NonMA AAs (LS)	46.60	256	12,221	254	9,351	340	14,908	0	0	850	36,480	33.82
<b>Oklahoma:</b>												
Oklahoma City MA (FS)	75.92	104	6,897	471	59,454	2	206	1	2,680	578	69,237	91.53
Tulsa MA (LS)	24.08	10	1,455	172	14,481	1	20	0	0	183	15,956	8.47
<b>Nebraska:</b>												
Omaha MA (FS)	100.00	34	2,271	316	36,670	6	548	8	35,000	364	74,489	100.00

FS – Full Scope; LS – Limited Scope

\* 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 July 8, 2003 to April 23, 2007.

\*\*\* Deposit Data as of June 30, 2006. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.



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

Geographic Distribution: HOME PURCHASE		Geography: MO/KS/OK/NE						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****	Over all	Low	Mod	Mid	Upp
<b>Multistate MAs:</b>															
Kansas City MA (FS)	458	100.00	3.32	1.97	16.21	14.85	46.12	53.93	34.34	29.26	0.18	0.12	0.17	0.23	0.13
St Louis MA (FS)	172	100.00	3.33	2.91	17.41	22.67	48.72	54.07	30.53	20.35	0.06	0.10	0.05	0.07	0.04
<b>Missouri:</b>															
St Joseph (FS)	76	18.40	0.00	0.00	9.14	7.89	58.32	56.58	32.55	35.53	0.79	0.00	1.79	0.61	0.84
Joplin MA (LS)	74	17.92	0.00	0.00	8.10	8.11	84.22	81.08	7.68	10.81	0.53	0.00	0.62	0.50	0.73
Springfield MA (LS)	36	8.72	0.04	0.00	13.17	11.11	56.03	47.22	30.76	41.67	0.05	0.00	0.09	0.06	0.02
Columbia MA (LS)	31	7.51	1.68	6.45	12.53	12.90	59.86	51.61	25.94	29.03	0.17	0.00	0.34	0.17	0.09
Jefferson City MA (LS)	17	4.12	0.71	5.88	8.52	5.88	72.97	82.35	17.80	5.88	0.10	0.00	0.49	0.09	0.00
Combined NonMA AAs (LS)	179	43.34	0.00	0.00	1.93	0.56	77.21	77.09	20.86	22.35	0.97	0.00	0.00	1.10	0.68
<b>Kansas:</b>															
Topeka MA (FS)	70	41.92	0.65	0.00	21.77	24.29	41.36	40.00	36.23	35.71	0.40	0.00	0.72	0.27	0.38
Wichita MA (LS)	12	7.19	1.40	8.33	22.67	8.33	46.10	58.33	29.83	25.00	0.01	0.00	0.00	0.01	0.02
Lawrence MA (LS)	13	7.78	0.11	0.00	19.97	38.46	49.84	38.46	30.08	23.08	0.09	0.00	0.30	0.06	0.00
Combined NonMA AAs (LS)	72	43.11	0.00	0.00	8.74	26.39	91.26	73.61	0.00	0.00	7.21	0.00	16.36	5.87	0.00
<b>Oklahoma:</b>															
Oklahoma City MA (FS)	37	92.50	2.81	5.41	28.33	43.24	34.78	32.43	34.08	18.92	0.06	0.40	0.12	0.07	0.01
Tulsa MA (LS)	3	7.50	1.49	33.33	19.28	0.00	39.59	0.00	39.63	66.67	0.01	0.58	0.00	0.00	0.00
<b>Nebraska:</b>															
Omaha MA (FS)	7	100.00	1.31	0.00	18.58	14.29	46.71	28.57	33.39	57.14	0.01	0.00	0.03	0.01	0.00

FS – Full Scope; LS – Limited Scope

\* Based on 2005 Peer Mortgage Data (Western)

\*\* 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: MO/KS/OK/NE						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 ****	Over all	Low	Mod	Mid	Upp
<b>Multistate MAs:</b>															
Kansas City MA (FS)	1,893	100.00	3.32	2.91	16.21	16.53	46.12	52.19	34.34	28.37	12.16	9.94	9.73	14.13	10.77
St Louis MA (FS)	2,270	100.00	3.33	2.03	17.41	18.99	48.72	49.43	30.53	29.56	8.45	5.14	7.53	8.40	9.59
<b>Missouri:</b>															
St Joseph (FS)	106	25.12	0.00	0.00	9.14	10.38	58.32	58.49	32.55	31.13	8.45	0.00	11.36	6.25	10.92
Joplin MA (LS)	53	12.56	0.00	0.00	8.10	13.21	84.22	81.13	7.68	5.66	3.65	0.00	6.58	3.42	1.85
Springfield MA (LS)	75	17.77	0.04	0.00	13.17	14.67	56.03	52.00	30.76	33.33	2.82	0.00	2.44	3.00	2.63
Columbia MA (LS)	52	12.32	1.68	3.85	12.53	11.54	59.86	69.23	25.94	15.38	9.79	22.22	11.11	9.72	7.58
Jefferson City MA (LS)	13	3.08	0.71	0.00	8.52	0.00	72.97	92.31	17.80	7.69	0.49	0.00	0.00	0.66	0.00
Combined NonMA AAs (LS)	123	29.15	0.00	0.00	1.93	0.00	77.21	83.74	20.86	16.26	6.95	0.00	0.00	7.04	7.14
<b>Kansas:</b>															
Topeka MA (FS)	77	35.32	0.65	0.00	21.77	28.57	41.36	36.36	36.23	35.06	4.22	0.00	5.22	3.61	4.53
Wichita MA (LS)	82	37.61	1.40	2.44	22.67	36.59	46.10	36.59	29.83	24.39	0.83	2.78	1.26	0.65	0.70
Lawrence MA (LS)	17	7.80	0.11	0.00	19.97	17.65	49.84	47.06	30.08	35.29	1.96	0.00	1.75	1.61	2.70
Combined NonMA AAs (LS)	42	19.27	0.00	0.00	8.74	23.81	91.26	76.19	0.00	0.00	24.66	0.00	40.00	22.22	0.00
<b>Oklahoma:</b>															
Oklahoma City MA(FS)	10	100.00	2.81	10.00	28.33	60.00	34.78	20.00	34.08	10.00	0.15	1.12	0.32	0.09	0.00
Tulsa MA (LS)	0	0.00	1.49	0.00	19.28	0.00	39.59	0.00	39.63	0.00	0.00	0.00	0.00	0.00	0.00
<b>Nebraska:</b>															

\* Based on 2005 Peer Mortgage Data (Western)

\*\* 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)

Omaha MA (FS)	17	100.00	1.31	0.00	18.58	0.00	46.71	52.94	33.39	47.06	0.10	0.00	0.00	0.00	0.29
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FS – Full Scope; LS – Limited Scope

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: MO/KS/OK/NE			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				
<b>Multistate MAs:</b>																			
Kansas City MA (FS)	495	100.00	3.32	2.63	16.21	20.00	46.12	52.12	34.34	25.25	0.17	0.17	0.29	0.17	0.12				
St Louis MA (FS)	211	100.00	3.33	2.37	17.41	19.91	48.72	54.03	30.53	23.70	0.06	0.11	0.06	0.06	0.05				
<b>Missouri:</b>																			
St Joseph (FS)	68	14.56	0.00	0.00	9.14	5.88	58.32	64.71	32.55	29.41	0.63	0.00	0.34	0.60	0.74				
Joplin MA (LS)	71	15.20	0.00	0.00	8.10	5.63	84.22	85.92	7.68	8.45	0.56	0.00	0.54	0.58	0.32				
Springfield MA (LS)	29	6.21	0.04	0.00	13.17	24.14	56.03	48.28	30.76	27.59	0.07	0.00	0.30	0.05	0.03				
Columbia MA (LS)	30	6.42	1.68	0.00	12.53	10.00	59.86	50.00	25.94	40.00	0.25	0.00	0.00	0.24	0.39				
Jefferson City MA (LS)	20	4.28	0.71	10.00	8.52	0.00	72.97	80.00	17.80	10.00	0.09	0.00	0.00	0.12	0.00				
Combined NonMA AAs (LS)	249	53.32	0.00	0.00	1.93	0.40	77.21	78.71	20.86	20.88	1.50	0.00	0.00	1.64	1.18				
<b>Kansas:</b>																			
Topeka MA (FS)	54	25.23	0.65	0.00	21.77	25.93	41.36	42.59	36.23	31.48	0.26	0.00	0.77	0.13	0.19				
Wichita MA (LS)	8	3.74	1.40	0.00	22.67	75.00	46.10	0.00	29.83	25.00	0.02	0.00	0.11	0.00	0.00				
Lawrence MA (LS)	13	6.07	0.11	0.00	19.97	23.08	49.84	46.15	30.08	30.77	0.10	0.00	0.31	0.00	0.10				
Combined NonMA AAs (LS)	139	64.95	0.00	0.00	8.74	23.02	91.26	76.98	0.00	0.00	8.67	0.00	21.74	7.40	0.00				
<b>Oklahoma:</b>																			
Oklahoma City MA (FS)	57	89.06	2.81	5.26	28.33	43.86	34.78	12.28	34.08	38.60	0.13	0.49	0.20	0.02	0.17				
Tulsa MA (LS)	7	10.94	1.49	14.29	19.28	57.14	39.59	14.29	39.63	14.29	0.03	0.00	0.10	0.00	0.02				
<b>Nebraska:</b>																			
Omaha MA (FS)	10	100.00	1.31	0.00	18.58	10.00	46.71	70.00	33.39	20.00	0.03	0.00	0.03	0.05	0.00				

\* Based on 2005 Peer Mortgage Data (Western)

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

Geographic Distribution: MULTIFAMILY			Geography: MO/KS/OK/NE				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans**** *	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overa ll	Low	Mod	Mid	Upp	
<b>Multistate MAs:</b>																
Kansas City MA (FS)	4	100.00	7.07	0.00	27.85	25.00	45.94	75.00	19.14	0.00	0.00	0.00	0.00	0.00	0.00	
St Louis MA (FS)	1	100.00	10.91	0.00	20.43	100.00	47.22	0.00	21.44	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Missouri:</b>																
St Joseph (FS)	1	33.33	0.00	0.00	28.41	100.00	31.01	0.00	40.59	0.00	0.00	0.00	0.00	0.00	0.00	
Joplin MA (LS)	2	66.67	0.00	0.00	33.32	100.00	59.26	0.00	7.41	0.00	3.92	0.00	25.00	0.00	0.00	
Springfield MA (LS)	0	0.00	8.02	0.00	20.22	0.00	52.94	0.00	18.82	0.00	0.00	0.00	0.00	0.00	0.00	
Columbia MA (LS)	0	0.00	26.53	0.00	30.29	0.00	16.53	0.00	26.64	0.00	0.00	0.00	0.00	0.00	0.00	
Jefferson City MA (LS)	0	0.00	14.84	0.00	33.78	0.00	36.35	0.00	15.02	0.00	0.00	0.00	0.00	0.00	0.00	
Combined NonMA AAs (LS)	0	0.00	0.00	0.00	2.14	0.00	76.04	0.00	21.82	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Kansas:</b>																
Topeka MA (FS)	2	40.00	5.50	0.00	22.25	100.00	52.47	0.00	19.77	0.00	0.00	0.00	0.00	0.00	0.00	
Wichita MA (LS)	0	0.00	4.30	0.00	32.79	0.00	42.30	0.00	20.62	0.00	0.00	0.00	0.00	0.00	0.00	
Lawrence MA (LS)	0	0.00	10.24	0.00	34.66	0.00	37.90	0.00	17.20	0.00	0.00	0.00	0.00	0.00	0.00	
Combined NonMA AAs (LS)	3	60.00	0.00	0.00	20.47	0.00	79.53	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Oklahoma:</b>																
Oklahoma City MA (FS)	0	0.00	4.97	0.00	43.58	0.00	30.03	0.00	21.42	0.00	0.00	0.00	0.00	0.00	0.00	
Tulsa MA (LS)	0	0.00	3.71	0.00	25.03	0.00	39.55	0.00	31.71	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Nebraska:</b>																
Omaha MA (FS)	0	0.00	2.05	0.00	29.29	0.00	52.84	0.00	15.82	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2005 Peer Mortgage Data (Western)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: MO/KS/OK/NE						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 Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Multistate MAs:</b>															
Kansas City MA(FS)	3,236	100.00	4.07	6.09	17.86	24.44	43.86	41.72	33.05	27.75	2.71	5.69	4.65	2.75	1.79
St Louis MA (FS)	1,041	100.00	5.31	4.71	18.73	19.69	42.89	45.92	32.72	29.68	0.59	1.03	0.81	0.62	0.46
<b>Missouri:</b>															
St Joseph (FS)	125	9.94	0.00	0.00	17.58	20.00	45.44	44.80	36.99	35.20	1.22	0.00	2.13	1.36	0.86
Joplin MA (LS)	209	16.63	0.00	0.00	15.47	19.14	76.32	75.60	8.21	5.26	1.79	0.00	1.39	2.17	0.30
Springfield MA (LS)	170	13.52	3.35	0.00	14.63	40.59	54.58	35.88	27.44	23.53	0.58	0.00	1.52	0.41	0.49
Columbia MA (LS)	178	14.16	18.16	16.85	16.20	7.87	46.47	38.76	19.17	36.52	1.84	2.46	0.59	1.55	2.74
Jefferson City MA (LS)	84	6.68	13.64	11.90	13.62	25.00	58.68	46.43	14.04	16.67	0.93	0.47	1.99	0.57	1.89
Combined NonMA AAs (LS)	491	39.06	0.00	0.00	4.12	0.61	78.36	82.28	17.52	17.11	3.29	0.00	0.38	3.99	2.32
<b>Kansas:</b>															
Topeka MA (FS)	169	19.34	13.82	14.79	20.33	19.53	39.83	38.46	26.01	27.22	1.26	2.80	1.00	1.31	0.94
Wichita MA (LS)	376	43.02	2.85	3.99	30.73	43.62	40.11	36.70	26.31	15.69	1.23	0.90	2.08	1.07	0.72
Lawrence MA (LS)	75	8.58	2.31	0.00	25.83	26.67	46.21	37.33	25.65	36.00	1.18	0.00	1.05	0.85	1.89
Combined NonMA AAs (LS)	254	29.06	0.00	0.00	18.22	27.95	81.78	72.05	0.00	0.00	17.23	0.00	36.62	15.14	0.00
<b>Oklahoma:</b>															
Oklahoma City MA (FS)	451	72.39	6.13	21.73	29.01	25.72	32.06	20.40	29.37	32.15	0.75	3.22	0.82	0.55	0.56
Tulsa MA (LS)	172	27.61	1.42	2.33	23.50	19.77	36.60	33.14	38.48	44.77	0.19	0.47	0.06	0.18	0.26
<b>Nebraska:</b>															
Omaha MA (FS)	316	100.00	2.47	0.95	19.27	8.86	46.25	37.03	32.01	53.16	0.79	0.00	0.32	0.51	1.44

\* Based on 2005 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).



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

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: MO/KS/OK/NE															
Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006															
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
<b>Multistate MAs:</b>															
Kansas City MA (FS)	49	100.00	1.41	0.00	11.77	0.00	52.68	59.18	33.95	40.82	6.38	0.00	0.00	8.04	5.92
St Louis MA (FS)	10	100.00	1.43	0.00	10.36	0.00	61.27	30.00	26.88	70.00	1.34	0.00	0.00	1.01	2.56
<b>Missouri:</b>															
St Joseph (FS)	39	2.81	0.00	0.00	2.64	0.00	66.52	82.05	30.84	17.95	2.51	0.00	0.00	2.94	1.59
Joplin MA (LS)	151	10.89	0.00	0.00	4.06	0.00	92.25	99.34	3.69	0.66	20.54	0.00	0.00	20.91	0.00
Springfield MA (LS)	11	0.79	0.47	0.00	6.90	0.00	69.59	27.27	23.04	72.73	0.55	0.00	0.00	0.21	3.17
Columbia MA (LS)	35	2.52	3.95	0.00	20.24	0.00	67.24	94.29	8.58	5.71	5.02	0.00	0.00	5.92	5.88
Jefferson City MA (LS)	1	0.07	2.12	0.00	7.78	0.00	75.47	0.00	14.62	100.00	0.70	0.00	0.00	0.00	7.69
Combined NonMA AAs (LS)	1,150	82.91	0.00	0.00	0.42	0.00	80.53	75.83	19.05	24.17	19.55	0.00	0.00	19.71	19.54
<b>Kansas:</b>															
Topeka MA (FS)	3	0.87	3.26	0.00	12.17	0.00	51.04	0.00	33.53	100.00	1.35	0.00	0.00	0.00	3.57
Wichita MA (LS)	3	0.87	1.05	0.00	13.76	33.33	52.82	66.67	32.37	0.00	0.00	0.00	0.00	0.00	0.00
Lawrence MA (LS)	0	0.00	0.00	0.00	11.83	0.00	54.84	0.00	33.33	0.00	0.00	0.00	0.00	0.00	0.00
Combined NonMA AAs (LS)	340	98.27	0.00	0.00	2.76	6.47	97.24	93.53	0.00	0.00	75.00	0.00	55.56	76.30	0.00
<b>Oklahoma:</b>															
Oklahoma City MA (FS)	2	66.67	3.93	0.00	20.03	0.00	33.33	0.00	41.44	100.00	0.72	0.00	0.00	0.00	1.85
Tulsa MA (LS)	1	33.33	0.83	0.00	18.67	100.00	40.66	0.00	39.83	0.00	1.19	0.00	11.11	0.00	0.00
<b>Nebraska:</b>															
Omaha MA (FS)	6	100.00	0.47	0.00	10.82	0.00	49.39	83.33	39.32	16.67	0.94	0.00	0.00	1.96	0.00

FS – Full Scope; LS – Limited Scope

\* Based on 2005 Peer Small Business Data -- US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2006).



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

Borrower Distribution: HOME PURCHASE			Geography: MO/KS/OK/NE						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 ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
<b>Multistate MAs:</b>															
Kansas City MA (FS)	458	100.00	18.08	17.94	18.42	26.91	23.44	26.48	40.06	28.67	0.22	0.33	0.22	0.22	0.18
St Louis MA (FS)	172	100.00	19.34	17.54	17.97	26.90	22.17	22.22	40.51	33.33	0.07	0.10	0.07	0.05	0.08
<b>Missouri:</b>															
St Joseph (FS)	76	18.40	18.15	13.33	18.03	33.33	23.78	24.00	40.04	29.33	0.98	0.71	1.04	1.22	0.85
Joplin MA (LS)	74	17.92	17.53	20.27	19.46	14.86	24.59	25.68	38.41	39.19	0.65	0.54	0.28	0.43	1.18
Springfield MA (LS)	36	8.72	16.66	5.56	19.27	13.89	23.87	30.56	40.20	50.00	0.06	0.00	0.03	0.03	0.12
Columbia MA (LS)	31	7.51	19.80	6.90	18.22	34.48	23.18	10.34	38.80	48.28	0.19	0.20	0.18	0.10	0.27
Jefferson City MA (LS)	17	4.12	16.91	18.75	17.63	25.00	26.23	31.25	39.22	25.00	0.12	0.00	0.13	0.14	0.14
Combined NonMA AAs (LS)	179	43.34	16.81	10.80	17.27	21.02	24.12	22.73	41.80	45.45	1.21	1.34	1.55	0.98	1.15
<b>Kansas:</b>															
Topeka MA (FS)	70	41.92	13.32	17.14	15.07	28.57	21.62	20.00	49.99	34.29	0.48	0.18	0.52	0.43	0.60
Wichita MA (LS)	12	7.19	17.98	8.33	18.92	58.33	24.26	8.33	38.84	25.00	0.02	0.06	0.03	0.00	0.00
Lawrence MA (LS)	13	7.78	18.17	15.38	18.89	0.00	24.70	23.08	38.24	61.54	0.10	0.00	0.00	0.00	0.25
Combined NonMA AAs (LS)	72	43.11	18.83	18.06	21.30	31.94	26.95	29.17	32.93	20.83	9.01	10.64	12.50	9.30	5.22
<b>Oklahoma:</b>															
Oklahoma City MA (FS)	37	92.50	22.30	16.22	18.43	13.51	20.85	16.22	38.42	54.05	0.07	0.11	0.05	0.06	0.08
Tulsa MA (LS)	3	7.50	18.98	0.00	17.50	33.33	20.90	0.00	42.62	66.67	0.01	0.00	0.03	0.00	0.00
<b>Nebraska:</b>															
Omaha MA (FS)	7	100.00	17.04	0.00	18.37	28.57	23.98	28.57	40.62	42.86	0.01	0.00	0.04	0.00	0.00

FS – Full Scope; LS – Limited Scope

\* Based on 2005 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 0.2% 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. Data shown includes only One to Four-family and manufactured housing. (Property type 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MO/KS/OK/NE					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Multistate MAs:</b>																
Kansas City MA(FS)	1,893	100.00	18.08	10.22	18.42	26.24	23.44	34.27	40.06	29.27	12.63	9.02	13.74	14.86	11.45	
St Louis MA (FS)	2,270	100.00	19.34	10.05	17.97	24.86	22.17	30.85	40.51	34.24	9.15	6.93	9.30	10.30	8.95	
<b>Missouri:</b>																
St Joseph (FS)	106	25.12	18.15	10.48	18.03	25.71	23.78	31.43	40.04	32.38	8.70	2.33	10.98	5.50	12.61	
Joplin MA (LS)	53	12.56	17.53	15.09	19.46	28.30	24.59	35.85	38.41	20.75	3.82	5.95	4.88	2.99	2.93	
Springfield MA (LS)	75	17.77	16.66	10.81	19.27	24.32	23.87	32.43	40.20	32.43	2.97	2.75	1.56	3.77	3.24	
Columbia MA (LS)	52	12.32	19.80	9.62	18.22	28.85	23.18	21.15	38.80	40.38	10.16	10.00	10.67	7.61	12.04	
Jefferson City (LS)	13	3.08	16.91	15.38	17.63	46.15	26.23	30.77	39.22	7.69	0.52	0.00	0.00	1.59	0.00	
Combined NonMA AAs (LS)	123	29.15	16.81	6.67	17.27	19.17	24.12	28.33	41.80	45.83	7.29	6.25	6.11	9.62	6.76	
<b>Kansas:</b>																
Topeka MA (FS)	77	35.32	13.32	10.39	15.07	25.97	21.62	33.77	49.99	29.87	4.40	3.80	5.04	6.21	2.90	
Wichita MA (LS)	82	37.61	17.98	15.85	18.92	26.83	24.26	28.05	38.84	29.27	0.86	1.15	0.92	0.98	0.60	
Lawrence MA (LS)	17	7.80	18.17	11.76	18.89	5.88	24.70	41.18	38.24	41.18	2.11	4.76	0.00	1.28	3.30	
Combined NonMA AAs (LS)	42	19.27	18.83	11.90	21.30	26.19	26.95	26.19	32.93	35.71	25.00	30.77	26.67	18.18	27.27	
<b>Oklahoma:</b>																
Oklahoma City (FS)	10	100.00	22.30	50.00	18.43	0.00	20.85	20.00	38.42	30.00	0.15	0.66	0.00	0.12	0.08	
Tulsa MA (LS)	0	0.00	18.98	0.00	17.50	0.00	20.90	0.00	42.62	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Nebraska:</b>																
Omaha MA (FS)	17	100.00	17.04	0.00	18.37	23.53	23.98	11.76	40.62	64.71	0.10	0.00	0.00	0.00	0.27	

FS – Full Scope; LS – Limited Scope

\* Based on 2005 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 0.7% 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. Data shown includes only One to Four-family and manufactured housing. (Property type 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MO/KS/OK/NE				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Multistate MAs:</b>																
Kansas City MA (FS)	495	100.00	18.08	16.39	18.42	28.69	23.44	24.80	40.06	30.12	0.22	0.27	0.24	0.16	0.23	
St Louis MA (FS)	211	100.00	19.34	17.14	17.97	30.00	22.17	31.90	40.51	20.95	0.07	0.05	0.08	0.09	0.06	
<b>Missouri:</b>																
St Joseph (FS)	68	14.56	18.15	16.18	18.03	27.94	23.78	23.53	40.04	32.35	0.78	1.15	0.81	0.60	0.78	
Joplin MA (LS)	71	15.20	17.53	11.43	19.46	21.43	24.59	22.86	38.41	44.29	0.74	0.90	0.39	0.77	0.88	
Springfield MA (LS)	29	6.21	16.66	6.90	19.27	10.34	23.87	31.03	40.20	51.72	0.09	0.00	0.06	0.04	0.17	
Columbia MA (LS)	30	6.42	19.80	16.67	18.22	13.33	23.18	26.67	38.80	43.33	0.30	0.00	0.19	0.50	0.28	
Jefferson City (LS)	20	4.28	16.91	10.53	17.63	21.05	26.23	26.32	39.22	42.11	0.11	0.00	0.00	0.19	0.17	
Combined NonMA AAs (LS)	249	53.32	16.81	6.88	17.27	19.84	24.12	27.94	41.80	45.34	1.97	1.91	2.03	1.59	2.16	
<b>Kansas:</b>																
Topeka MA (FS)	54	25.23	13.32	13.21	15.07	26.42	21.62	18.87	49.99	41.51	0.32	0.34	0.61	0.11	0.26	
Wichita MA (LS)	8	3.74	17.98	25.00	18.92	0.00	24.26	0.00	38.84	75.00	0.03	0.00	0.00	0.00	0.08	
Lawrence MA (LS)	13	6.07	18.17	15.38	18.89	23.08	24.70	30.77	38.24	30.77	0.12	0.65	0.19	0.00	0.09	
Combined NonMA AAs (LS)	139	64.95	18.83	18.12	21.30	23.19	26.95	26.81	32.93	31.88	10.05	15.00	13.92	7.30	9.34	
<b>Oklahoma:</b>																
Oklahoma City (FS)	57	89.06	22.30	19.30	18.43	24.56	20.85	15.79	38.42	40.35	0.16	0.41	0.22	0.10	0.12	
Tulsa MA (LS)	7	10.94	18.98	0.00	17.50	14.29	20.90	14.29	42.62	71.43	0.03	0.00	0.05	0.00	0.04	
<b>Nebraska:</b>																
Omaha MA (FS)	10	100.00	17.04	0.00	18.37	20.00	23.98	30.00	40.62	50.00	0.04	0.00	0.03	0.05	0.04	

\* Based on 2005 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 1.4% 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. Data shown includes only One to Four-family and manufactured housing. (Property type 1 or 2)

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

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: MO/KS/OK/NE		Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% 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
<b>Multistate MAs:</b>									
Kansas City MA (FS)	3,338	100.00	63.87	34.96	61.80	16.18	22.02	2.71	2.19
St Louis MA (FS)	1,046	100.00	65.10	38.15	65.49	15.01	19.50	0.59	0.53
<b>Missouri:</b>									
St Joseph (FS)	125	9.94	60.55	52.00	76.00	12.00	12.00	1.22	1.24
Joplin MA (LS)	209	16.63	61.00	71.77	83.73	9.09	7.18	1.79	2.83
Springfield MA (LS)	170	13.52	60.73	48.24	68.82	15.29	15.88	0.58	0.63
Columbia MA (LS)	178	14.16	62.45	70.79	79.78	12.92	7.30	1.84	2.67
Jefferson City MA (LS)	84	6.68	59.51	67.86	72.62	11.90	15.48	0.93	1.07
Combined NonMA AAs (LS)	491	39.06	53.59	75.56	85.54	8.35	6.11	3.29	4.50
<b>Kansas:</b>									
Topeka MA (FS)	169	19.34	60.07	60.36	81.07	10.06	8.88	1.26	1.53
Wichita MA (LS)	376	43.02	59.23	44.95	66.76	14.63	18.62	1.23	1.43
Lawrence MA (LS)	75	8.58	63.82	60.00	80.00	6.67	13.33	1.18	1.53
Combined NonMA AAs (LS)	254	29.06	53.82	84.65	93.70	3.54	2.76	17.23	26.90
<b>Oklahoma:</b>									
Oklahoma City MA(FS)	471	73.25	61.85	68.79	69.21	15.92	14.86	0.75	1.21
Tulsa MA (LS)	172	26.75	63.18	37.79	81.98	8.72	9.30	0.19	0.17
<b>Nebraska:</b>									

\* Based on 2005 Peer Small Business Data -- US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2006).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 16.66% of small loans to businesses originated and purchased by the bank.

Omaha MA (FS)	316	100.00	63.08	31.01	78.80	8.86	12.34	0.79	0.42
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FS – Full Scope; LS – Limited Scope

Institution ID: UMB Bank, N.A. 23920

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MO/KS/OK/NE			Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006				
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 \$1,000,000	All	Rev\$ 1 Million or Less
<b>Multistate MAs:</b>									
Kansas City MA (FS)	49	100.00	91.00	89.80	65.31	24.49	10.20	6.38	6.83
St Louis MA (FS)	10	100.00	92.64	100.00	60.00	40.00	0.00	1.34	1.71
<b>Missouri:</b>									
St Joseph (FS)	39	2.81	96.70	100.00	94.87	5.13	0.00	2.51	2.64
Joplin MA (LS)	151	10.89	95.94	96.69	93.38	6.62	0.00	20.54	22.34
Springfield MA (LS)	11	0.79	95.32	100.00	90.91	0.00	9.09	0.55	0.58
Columbia MA (LS)	35	2.52	95.20	80.00	77.14	14.29	8.57	5.02	3.16
Jefferson City MA (LS)	1	0.07	96.46	100.00	100.00	0.00	0.00	0.70	0.75
Combined NonMA AAs (LS)	1,150	82.91	97.81	97.22	91.04	6.87	2.09	19.55	20.59
<b>Kansas:</b>									
Topeka MA (FS)	3	0.87	95.25	100.00	100.00	0.00	0.00	1.35	1.56
Wichita MA (LS)	3	0.87	92.92	66.67	66.67	33.33	0.00	0.00	0.00
Lawrence MA (LS)	0	0.00	94.27	0.00	0.00	0.00	0.00	0.00	0.00
Combined NonMA AAs (LS)	340	98.27	96.55	98.53	92.06	5.00	2.94	75.00	78.10
<b>Oklahoma:</b>									
Oklahoma City MA(FS)	2	66.67	88.97	100.00	50.00	50.00	0.00	0.72	0.92
Tulsa MA (LS)	1	33.33	91.15	100.00	100.00	0.00	0.00	1.19	1.54

\* Based on 2005 Peer Small Business Data -- US and PR

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2006).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 8.16% of small loans to farms originated and purchased by the bank.

<b>Nebraska:</b>										
Omaha MA (FS)	6	100.00	92.10	100.00	66.67	33.33	0.00	0.94	1.20	

FS – Full Scope; LS – Limited Scope

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MO/KS/OK/NE				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Multistate MAs:</b>									
Kansas City MA (FS)	5	32,090	38	15,029	43	47,119	58.14	0	0
St Louis MA (FS)	1	240	129	10,634	130	10,874	13.42	1	848
<b>Missouri:</b>									
St Joseph (FS)	1	6	4	54	5	60	0.07	0	0
Joplin MA (LS)	2	1,564	8	1,844	10	3,408	4.20	0	0
Springfield MA (LS)	0	0	4	1,413	4	1,413	1.74	0	0
Columbia MA (LS)	0	0	3	8	3	8	0.01	0	0
Jefferson City MA (LS)	1	357	3	12	4	369	0.46	0	0
Combined NonMA AAs (LS)	2	815	18	1,379	20	2,194	2.71	0	0
Statewide with Potential Benefit to AA	0	0	24	8,909	24	8,909	10.99	0	0
<b>Kansas:</b>									
Topeka MA (FS)	0	0	6	512	6	512	0.63	0	0
Wichita MA (LS)	0	0	2	843	2	843	1.04	0	0
Lawrence MA (LS)	0	0	3	413	3	413	0.51	0	0
Combined NonMA AAs (LS)	1	2,015	4	30	5	2,045	2.52	0	0
<b>Oklahoma:</b>									
Oklahoma City MA(FS)	1	215	5	1,148	6	1,363	1.68	0	0
Tulsa MA (LS)	0	0	4	399	4	399	0.49	0	0
<b>Nebraska:</b>									
Omaha MA (FS)	0	0	5	1,118	5	1,118	1.38	0	0

FS – Full Scope; LS – Limited Scope

\* '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.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM and BRANCH OPENINGS/CLOSINGS Geography: MO/KS/OK/NE Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006																	
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>Multistate MAs:</b>																	
Kansas City MA (FS)	100.00	*38	100.00	2.63	7.89	73.68	15.80	5	**6	0	0	-2	+1	5.32	19.93	44.72	30.01
St Louis MA (FS)	100.00	26	100.00	0.00	23.08	30.77	46.15	3	4	0	0	-3	+2	6.27	20.58	45.63	27.52
<b>Missouri:</b>																	
St Joseph MA (FS)	16.37	4	12.90	0.00	50.00	50.00	0.00	0	1	0	0	0	-1	0.00	12.94	54.09	32.97
Joplin MA (LS)	10.56	5	16.13	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	11.30	81.76	6.94
Springfield MA (LS)	9.30	4	12.90	0.00	25.00	50.00	25.00	0	2	0	0	-1	-1	1.86	17.44	54.37	26.33
Columbia MA (LS)	10.31	3	9.68	66.67	0.00	0.00	33.33	0	0	0	0	0	0	6.96	18.82	51.91	22.31
Jefferson City MA (LS)	5.67	1	3.23	0.00	0.00	100.00	0.00	0	0	0	0	0	0	3.57	10.40	69.08	15.26
Combined NonMA AAs (LS)	47.79	14	45.16	0.00	0.00	92.86	7.14	0	5	0	0	-5	0	0.00	2.41	77.49	20.10
<b>Kansas:</b>																	
Topeka MA (FS)	44.71	4	36.36	0.00	50.00	25.00	25.00	0	0	0	0	0	0	1.72	26.54	40.50	31.24
Wichita MA (LS)	12.11	3	27.27	0.00	33.33	33.33	33.34	1	0	0	0	+1	0	2.65	29.09	42.15	26.11
Lawrence MA (LS)	9.36	1	9.10	0.00	0.00	0.00	100.00	0	0	0	0	0	0	5.95	25.54	46.20	22.31
Combined NonMA AAs (LS)	33.82	3	27.27	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	9.57	90.43	0.00
<b>Oklahoma:</b>																	
Oklahoma City MA(FS)	91.53	***2	66.67	50.00	0.00	50.00	0.00	0	1	0	0	0	-1	4.62	35.85	31.89	27.55
Tulsa MA (LS)	8.47	1	33.33	0.00	0.00	0.00	100.00	0	0	0	0	0	0	2.72	24.16	38.71	34.41
<b>Nebraska:</b>																	
Omaha MA (FS)	100.00	3	100	0.00	0.00	66.67	33.33	3	4	0	0	+2	-3	2.57	25.11	43.94	28.37

FS – Full Scope; LS – Limited Scope

\*Total branches = 39. Kansas City MA Census Tract 28.02 does not have an income designation.

\*\*Total closings = 7. Kansas City MA Census Tract 28.01 does not have an income designation.

\*\*\*Total branches = 4. Oklahoma City MA Census Tract 1031.02 with 2 branches does not have an income designation.



