



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act
Performance Evaluation

UMB Bank Colorado, National Association
Charter Number: 23905

1670 Broadway
Denver, CO 80202

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

Performance Levels	UMB Bank Colorado, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- UMB Bank Colorado (UMB - CO) demonstrates excellent responsiveness to community credit needs. A substantial majority of the bank’s loans (91 percent) are within its designated assessment areas. The geographic distribution of loans is excellent. The distribution of loans by borrower income level demonstrates adequate performance in small business lending. The bank actively pursues and supports community development lending opportunities. The bank’s volume of CD loans is excellent and had a positive impact on the Lending Test.
- UMB-CO provided an excellent level of qualified community development investments. Qualified investments assisted in the availability of affordable housing, economic revitalization efforts, and support to charitable organizations that provide community and social services targeted to low- and moderate-income individuals.
- UMB-CO’s delivery systems are accessible to geographies and individuals of different income levels. No- and low-cost products offered by the bank target low- and moderate-income individuals, including products designed to assist individuals receiving public assistance. Bank personnel provided a good level of community development services by providing their financial expertise and assistance to organizations that primarily benefit low- and moderate-income individuals or promote economic development.

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 additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report).

These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

Upper-Income: Individual income that is 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 of Colorado, National Association (UMB-CO) is an \$854 million intrastate financial institution headquartered in Denver, Colorado. UMB-CO is a wholly owned subsidiary of UMB Financial Corporation (UMBFC), an \$8.2 billion regional, multi-bank holding company headquartered in Kansas City, Missouri. UMBFC consists of five national bank charters with branches in Missouri, Kansas, Illinois, Oklahoma, Nebraska, and Colorado. The company also is engaged in trust services, real estate ownership and management of bank premises, and insurance services that directly support subsidiary banks' activities. UMBFC also owns the UMB Community Development Corporation (UMB CDC). UMB CDC was established to facilitate low-cost mortgages to developers for the rehabilitation of distressed properties, and finance owner-occupied home improvement projects for low- and moderate-income persons.

UMB-CO is a full-service banking institution, which offers a wide variety of retail and commercial banking services. In addition, UMB-CO also provides treasury management, electronic payment, trust, securities transfer, capital market, investment banking, brokerage, insurance, and mutual fund services. As of September 30, 2006, UMB-CO's loan portfolio, by dollar volume, consisted of 20 percent loans to individuals, 32 percent commercial and industrial loans, 48 percent real estate loans, and less than 1 percent other loans. Net loans represent 82 percent of total deposits and 60 percent of total assets. Net Tier One Capital was \$74 million.

UMB-CO operates 11 branches and 16 Automated Teller Machines (ATMs) in the state of Colorado. Six branches and ten ATMs are in the Denver MA, and five branches and six ATMs are in the Colorado Springs MA.

UMB-CO completed the acquisition of Mountain States Bank (MSB) on September 15, 2006. MSB was a \$284 million community bank operating one banking facility located in Denver, CO. The acquisition of MSB substantially increased UMB-CO's assets and capital levels and increased the number of bank branches by one. Given the recent timing of the acquisition, activities conducted by and through MSB are not included in this evaluation of UMB-CO CRA performance.

There are no legal, financial, or other factors that impede the bank's ability to help meet credit needs in its assessment areas. UMB-CO received a "Satisfactory" rating at its last CRA examination dated October 20, 2003.

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 and small business. The bank did not report any small farm lending activity. We used 2005 peer lending data for small business, the most recent data available, to compare UMB's lending performance to other reporting lenders in each MA. Home mortgage lending is not a major product for the bank and is primarily provided as an accommodation for existing business customers. A low number of home mortgage loans were originated during the evaluation period and an analysis would not have been meaningful.

The evaluation period for the investment and the service tests, as well as for community development loans is October 21, 2003 through February 5, 2007. At the bank's request, we considered qualified investments and loans made by affiliates.

We used deposit information, reported to the Federal Deposit Insurance Corporation (FDIC) annually, to determine the bank's deposit market share and market presence within the MAs. The most recent deposit information available was as of June 30, 2006.

Given the short duration of time (less than six months) since the acquisition of Mountain States Bank (MSB), we did not evaluate CRA performance of MSB at this examination. MSB received a "Satisfactory" rating at its most recent CRA examination conducted by the Federal Reserve Bank on August 19, 2002. No further consideration of MSB's activity is contained in this Performance Evaluation.

Tables included in appendix C of this report detail the bank's lending activity for 2004, 2005, and 2006. Tables detailing activity for 2003 were omitted from the report. However, a review of the reported activity in 2003 was performed and the analysis is included in this report.

Data Integrity

To assess the accuracy of the data, in November 2006 we conducted an independent test of data for home mortgage and small business loan products. We did not identify any significant exceptions. Loan data is used without exception in this evaluation.

We also reviewed the bank's community development loans, investments, and services. Only those activities that qualified are presented and considered in this evaluation.

Selection of Areas for Full-Scope Review

The bank has identified a five county area in the Denver-Aurora MA as its primary assessment area (AA). Counties included in the bank defined AA are Denver, Adams, Arapahoe, Douglas, and Jefferson. The bank has also defined El Paso County in the Colorado Springs MA as its assessment area. The bank's defined AAs meet regulatory requirements.

For purposes of this document the Denver AA is referenced as the "Denver MA" and the Colorado Springs AA is referenced as the "Colorado Springs MA."

We performed a full-scope review for both areas.

Ratings

The bank's overall rating is based on performance in both MAs. We gave more weight to performance in the Denver MA since the largest volume of the bank's loans and deposits are derived within this market.

By product type, we gave the most weight to small business lending. An analysis of home mortgage lending was not performed as this is not a business focus of the bank and the volume of lending over the review period was minimal. Refer to appendix A of this report for details of the bank's lending activities. Additionally, more weight was placed on the 2004-2006 period than the 2003 period. Given the substantial volume of community development lending, our analysis of community development lending practices received a considerable amount of weight in the overall analysis.

Other

We conducted three community contacts during this evaluation. The community contacts identified small business and affordable housing as primary credit needs. Refer to the **Market Profiles** section in appendix B of this report for a complete discussion of community contact information.

Fair Lending or Other Illegal Credit Practices Review

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

Conclusions with Respect to Performance Tests

LENDING TEST

We evaluated small loans to businesses in the Denver and Colorado Springs MAs for the period January 1, 2003 through December 31, 2006. The bank reported only 24 mortgage loans over the review period. As such, an analysis of HMDA reportable lending was not performed. The absence of significant HMDA lending did not adversely impact the overall rating.

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "Outstanding." Based on full-scope reviews, the bank's performance in both the Denver and Colorado Springs MAs is good. The bank's responsiveness to community development (CD) lending needs is excellent given the bank's size and lending capacity, and the lending opportunities in the MAs. The significant volume of CD lending positively impacted the Lending Test.

Lending Activity

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

Lending activities reflect good responsiveness relative to area credit needs and deposit market share. Small business loans represent the largest volume of loans originated in both MAs during the evaluation period.

In the Denver MA, the bank originated 1,158 reportable loans during the evaluation period. All but 66 loans were reported as Small Loans to Businesses. Lending in this MA represents 84 percent of the bank's total reportable loans. Based on the 2005 Small Business Peer Data, UMB-CO ranked 21st in market share with approximately .51 percent of total area loans by number. As of June 30, 2006, the bank ranked 35th in deposit market share.

In the Colorado Springs MA, the bank originated 237 reportable loans during the evaluation period. Of these, 202 were small loans to businesses. Lending in this MA represents 16 percent of the bank's total reportable loans. Based on the 2005 Small Business Peer Data, UMB-CO ranked 18th in market share with approximately .33 percent of total area loans by number. As of June 30, 2006, the bank ranked eighth in deposit market share.

The bank originated a significant volume of CD loans. Within the Denver MA, the bank originated 57 CD qualified loans over the review period. In the Colorado Springs MA, the bank originated 19 CD qualified loans. This had a positive impact on the overall lending test, elevating the bank to an "outstanding" rating for lending performance.

Distribution of Loans by Income Level of the Geography

The distribution of small loans to businesses by income level of the geography is excellent in both the Denver and Colorado Springs MAs.

Home Mortgage Loans

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

Due to the low volume of HMDA reportable loans, an analysis of home mortgage lending was not performed.

Small Loans to Businesses

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

In the Denver MA, in 2004-2006 the distribution of small loans to businesses in low- and moderate-income census tracts is excellent. The bank's pattern of lending in low- and moderate-income census tracts exceeded area demographics. Based on Dunn and Bradstreet 2006 Business Data, approximately 4 percent of all businesses are located in low-income tracts and 25 percent are located in moderate-income tracts. Comparatively, 5 percent of the bank's loans were originated in low-income tracts and 26 percent were originated in moderate-income tracts. Market share in low- and moderate-income geographies was .79 percent and .71 percent, respectively, exceeding overall market share of .51 percent. Activity in 2003 was good. Although the bank's lending activity in low-income geographies at .74 percent did not reflect the percentage of businesses located in low-income tracts (4 percent), lending performance in moderate-income tracts of 30 percent exceeded demographics that showed that 26 percent of all businesses were located in moderate-income tracts. Market share in low- and moderate-income census tracts was .04 percent and .21 percent, respectively; exceeding overall market share of .17 percent.

In the Colorado Springs MA, in 2004-2006 the distribution of small loans to businesses in low- and moderate-income census tracts is also excellent. Businesses located in low- and moderate-income tracts are approximately 5 percent and 25 percent, respectively. The bank's pattern of lending indicates that 3 percent and 37 percent of all reportable small business loans were originated in low- and moderate-income tracts, respectively. The fact that the percent of bank loans in low-income tracts is less than area demographics is not of significant concern as there is only one low-income census tract in the Colorado Springs MA. The overall strong pattern of lending is supported by the bank's performance in moderate-income geographies. Similar performance was noted in 2003. The bank's lending performance in low- and moderate-income census tracts was 14 percent and 24 percent, respectively, compared to area demographics of 6 percent and 26 percent, respectively.

Lending Gap Analysis

We did not note any unexplained lending gaps within the Denver MA or Colorado Springs MA.

Inside/Outside Ratio

For the geographic distribution analysis under the Lending Test, we performed an inside/outside ratio analysis at the bank level. A majority of the bank's loans, 91 percent by

number, were originated within the bank's defined assessment area. By product type, 96 percent of home mortgage loans and 91 percent of reportable business loans were within the assessment area. We viewed this as a positive characteristic in our assessment of lending performance.

Distribution of Loans by Income Level of the Borrower

Distribution of loans by income level is adequate in both the Denver and Colorado Springs MAs.

Home Mortgage Loans

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

Due to the low volume of HMDA reportable loans, an analysis of home mortgage lending was not performed.

Small Loans to Businesses

Refer to Table 11 in appendix C for the facts and data used to evaluate the borrower distribution of small loans to businesses.

UMB-CO's distribution of loans to businesses of different sizes is adequate in both MAs. The pattern of lending to businesses with revenues of \$1 million or less is below area demographics

Within the Denver MA in 2004-2006, 32 percent of reportable business loans were originated to businesses with annual revenues of less than \$1 million. Demographic data indicates that 64 percent of all businesses have revenues less than \$1 million. Similar performance was noted in 2003, as the bank originated 35 percent of its loans to small businesses compared to area demographics of 62 percent of all businesses being small businesses.

Within the Colorado Springs MA in 2004-2006, 46 percent of reportable business loans were originated to businesses with annual revenues of less than \$1 million. Demographic data indicates that 66 percent of area businesses have revenues of less than \$1 million. In 2003, 36 percent of total loans were originated to small businesses compared to area demographics of 65 percent small businesses.

The bank's primary business focus in both AAs is working capital loans largely benefiting larger businesses. As the bank is not primarily a small business lender, the opportunities to lend to small businesses is limited. The bank faces strong competition from other large institutions serving the same AAs.

Community Development Lending

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development (CD) lending.

Over the evaluation period the bank originated a total of 76 CD loans totaling \$279 million. The significant volume of CD lending positively impacts the Lending Test.

In the Denver MA, the bank originated 57 CD loans totaling \$221 million to 23 businesses. A majority of the loans (\$205 million) helped promote economic development by providing funds to companies for supporting permanent job creation and retention for low- to moderate-income (LMI) individuals in areas targeted for redevelopment by state or local government. Loans totaling \$7.2 million helped promote activities that revitalize or stabilize geographies targeted for economic development. \$5.4 million in loans helped provide community services to LMI individuals. The bank provided a \$3.4 million loan to a non-profit organization to provide affordable housing for LMI individuals. Two loans were very responsive to low-income service needs and were also reflective of the bank's strong relationships with two active low-income service providers. One loan for \$2.5 million supported a drop-in shelter for homeless women and children. The other loan for \$1.4 million was to a non-profit organization that provides licensed residential treatment to homeless, mentally ill, abused, and at-risk youth.

In the Colorado Springs MA, the bank originated 19 CD loans totaling \$58 million to 6 businesses. All of the loans helped promote economic development by providing funds for supporting job creation and retention for LMI individuals in areas targeted for redevelopment by state or local government.

Management has identified CD lending opportunities that fit into the bank's focus of providing working capital loans. There are numerous opportunities in the Denver and Colorado Springs MAs for the bank to participate in the economic development of enterprise zones and aid in job creation and retention for LMI individuals. There are also opportunities to partner with various government agencies to provide affordable housing. Since our prior performance evaluation, the bank has substantially increased CD lending. Management has emphasized the importance of CD activities throughout the organization.

INVESTMENT TEST

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

The bank's performance under the investment test is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Denver MA is excellent and the performance in the Colorado Springs MA is adequate. More weight was given to performance in the Denver AA as 62 percent of total deposits are derived from this market.

Denver MA

In the Denver MA, qualified investments total \$4.1 million. All are current investments. There are no prior period investments that remain outstanding.

During the evaluation period, the bank invested \$355,000 in a general obligation bond issued by the Sheridan School District No. 2 of Arapahoe County. The purpose of the bonds was building expansion and improvements. Sixty-two percent of students in the School District are

low-and moderate-income. The majority of qualified investments in the Denver MA were in Mortgage Backed Securities (MBS). The bank invested \$2.98 million in 3 pools, which were comprised of 17 loans to low- to moderate-income borrowers in the Denver MA.

Additionally, the bank invested in UMB CDC, an affiliate of the bank established to promote affordable housing. UMB CDC was the lead in a public and private partnership whose purpose was to construct 33 condominiums as part of Denver's Inclusionary Housing Ordinance (IHO). The IHO provides incentives to promote the development of affordable housing for low- and moderate-income individuals in the City and County of Denver. Current period investment by UMB is \$500,000, with an additional \$292,000 in unfunded commitments.

The remaining current period investments in the Denver MA include donations to 13 CD organizations totaling \$275,000. A majority of these donations are to agencies that primarily serve low- to moderate-income individuals.

Colorado Springs MA

In the Colorado Springs MA, qualified investments total \$565,000. Current period investments total \$520,000 and prior period investments of \$45,000 remain outstanding.

The current period investments consist of \$492,000 in two MBS pools that include three loans to low- and moderate-income borrowers.

The remaining current period investments in the Colorado Springs MA include donations to eight CD organizations totaling \$28,000. A majority of these donations are to agencies that primarily serve low- to moderate-income individuals.

The \$45,000 prior period investment was made by UMB CDC. The purpose was to purchase an office building for a non-profit organization that provides subsidized rental housing to low- and moderate-income individuals in the Colorado Springs area. UMB CDC was the leader in a public and private partnership to provide affordable rental housing. UMB provided the primary funding and the City of Colorado Springs provided gap funding.

SERVICE TEST

The bank's performance under the Service Test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Denver MA and Colorado Springs MA is good. Management actively monitors loan and deposit activity to help ensure it is meeting the needs of consumers and small businesses.

Refer to Table 15 in appendix C for the data used to evaluate the distribution of the branch and ATM delivery systems, and openings and closings.

Retail Banking Services

UMB-CO's branch delivery system is accessible to geographies and individuals of different income levels in its AAs. In the Denver MA, 17 percent of the branches are located in low-

income tracts and 17 percent in moderate-income census tracts. This reflects excellent performance in low-income tracts and adequate performance in moderate-income tracts. In addition, one branch located in an upper-income census tract is adjacent to a moderate-income census tract. UMB-CO is ranked 35th among financial institutions serving the Denver area with 0.56 percent of the deposit market share.

In the Colorado Springs MA, 20 percent of the branches are located in low-income census tracts. The bank does not operate any branches in moderate-income tracts. Performance in low-income tracts is excellent and is adequate in moderate-income tracts. All four branches located in middle- and upper-income geographies are adjacent to moderate-income census tracts. Based on deposit market share, the bank is ranked eighth among financial institution, serving the Colorado Springs MA, with 2.72 percent of total deposits.

UMB-CO did not close or relocate any branches during the evaluation period.

UMB-CO operates 16 Automated Teller Machines (ATMs) in the state of Colorado. Six of the ATMs currently offer the menu options in English or Spanish. A project is in place to add this option to all ATMs in response to the growing Hispanic population. The distribution of ATMs helps provide good access to all geographies and individuals of different income levels. In the Denver MA, two (20 percent) of UMB-CO's ten ATMs are located in low- and moderate-income census tracts. Three ATMs are located in middle- and upper-income census tracts that are adjacent to low- and moderate-income geographies. Six locations accept deposits and four have the option of displaying information in either English or Spanish.

In the Colorado Springs MA, one (17 percent) of UMB-CO's six ATMs is located in a low-income census tract. Three ATMs are located in middle- and upper-income census tracts that are adjacent to moderate-income geographies. Four locations in middle- and upper income tracts accept deposits and two (one in the lower and one in an upper) have a Spanish language option.

During this same evaluation period, UMB-CO closed 12 ATMs as a result of the contract with a national drug store chain not being renewed. The contract was subsequently awarded to another financial institution. Also, one ATM closed when a grocery store closed. Eight of the ATMs, including two in moderate-income geographies, were closed in the Denver MA. Five of the ATMs were located in the Colorado Springs MA.

Banking hours and services do not vary significantly. Weekday hours of operation in low- and moderate-income geographies are comparable to those offered at the other branch locations.

Other alternative delivery systems offered by UMB-CO include:

- **Electronic Banking:** Through the UMB internet site, 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. Bill payment is a free service. Telephone banking services also allow 24-hour access to accounts. This is an alternative delivery system. Refer to comment above regarding if the bank has no information available regarding how LMI geographies and individuals are affected.

- Bank by mail: This service allows customers to mail deposits, payments, and messages to the bank. This is an alternative delivery system. Refer to comment above regarding if the bank has no information available regarding how LMI geographies and individuals are affected.

We could not place significant weight on the alternative delivery systems when drawing our CRA performance conclusions because no data was available demonstrating how low- and moderate-income individuals and geographies are affected.

Retail services specifically targeting the low- and moderate-income populations include:

- Colorado Quest Program and Temporary Aid to Needy Families: The State of Colorado provides benefit payments to recipients via electronic access cards (stored value cards). Recipients can access their funds free of charge through all UMB-CO ATMs.
- Electronic Transfer Accounts: Individuals who receive periodic payments from the federal government are provided low-cost accounts at UMB-CO. Payments are primarily social security and disability payments. This supports the government's initiative to improve access to financial services by encouraging low- and moderate-income individuals to establish deposit accounts to receive their payments. Recipients can access their funds free of charge in person at any UMB-CO bank or through the UMB-CO network of ATMs. A monthly charge of \$3.00 is assessed.

Management continues to monitor the effectiveness of the retail services in providing low- or no-cost services to low- and moderate-income individuals in an effort to enhance services to the un-banked community.

Community Development Services

UMB-CO provided a good level of community development services in both the Denver and Colorado Springs MAs.

In the Denver MA, bank staff provided their financial expertise to ten different organizations that promote community development initiatives. The organizations provide community services to low- and moderate-income individuals. Support is provided to organizations that build and rehabilitate affordable housing and promote economic development to revitalize or stabilize low- and moderate-income geographies. One organization specializes in the building and rehabilitation of affordable housing for benefit of low-income families, Denver's homeless population, and the mentally ill. Another organization that the bank actively supports is a private, non-profit organization that assists small businesses located in Enterprise Zones, and minority- and women-owned businesses obtain low-cost, permanent financing.

In the Colorado Springs MA, bank staff provided their financial expertise to six different organizations that promote community development initiatives. The organizations provide community services to low- and moderate-income individuals. One organization, in partnership with low-income families in need of housing, builds or renovates affordable housing projects. During 2006 this organization completed 78 projects serving 390 low-income individuals. Services provided include assistance in purchasing affordable housing, economic development financing, youth programs, and senior citizen programs.

Within both AAs the bank provides financial services through service on various boards, fundraising, and financial counseling.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/2003 to 12/31/2006 Investment and Service Tests and CD Loans: 10/21/2003 to 02/05/2007	
Financial Institution	Products Reviewed	
UMB of Colorado, National Association (UMB-CO) Denver, Colorado	<ul style="list-style-type: none"> • Home Mortgage, Small Business, Community Development Loans • Qualified Investments • Retail and Community Development Services 	
Affiliate(s)	Affiliate Relationship	Products Reviewed
UMB Financial Corporation (UMBFC)	Holding Company	<ul style="list-style-type: none"> • Qualified Investments
UMB Bank, n.a. (UMB)	Subsidiary of UMBFC	<ul style="list-style-type: none"> • Qualified Investments and Community Development Services
UMB Community Development Corporation (UMB CDC)	Subsidiary of UMBFC	<ul style="list-style-type: none"> • Qualified Investments and Community Development Lending
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Denver MA (Denver, Adams, Arapahoe, Douglas, and Jefferson Counties)	Full-Scope	
Colorado Springs MA (El Paso County)	Full-Scope	

Appendix B: Market Profiles for Full-Scope Areas

Denver MA

Demographic Information for Full Scope Area: Denver, Arapahoe, Jefferson, Douglas, Adams Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	512	4.10	27.93	38.67	28.52	0.78
Population by Geography	2,092,289	4.75	28.69	39.19	27.25	0.12
Owner-Occupied Housing by Geography	543,855	1.98	22.72	41.92	33.38	0.00
Business by Geography	205,721	3.96	24.48	36.67	34.16	0.72
Farms by Geography	3,376	1.87	21.48	38.27	37.94	0.44
Family Distribution by Income Level	526,488	18.42	18.91	23.66	39.00	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	196,552	7.89	42.80	36.40	12.91	0.00
Median Family Income		61,301	Median Housing Value	180,126		
HUD Adjusted Median Family Income for 2006		71,300	Unemployment Rate (2000 US Census)	2.17%		
Households Below Poverty Level		7%				

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census and 2006 HUD updated MFI

The bank has identified one assessment area as the metropolitan five county area of the Denver-Aurora MA (Denver MA). The Denver MA is the 22nd most populous MA in the United States consisting of six urban counties - Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson, and four rural counties - Elbert, Clear Creek, Gilpin, and Park. Economic conditions in the Denver MA remain generally stable and modest economic growth is projected for 2007. The December 2006 unemployment rate for the Denver MA was 4.0 percent. The median housing cost in 2006 remained high at \$252,000.

Major industries in the Denver MA include services, retail trade, finance, and construction. The largest employers represent a diverse cross-section of industries including aerospace, telecommunications, financial services, airlines, and high technology. Numerous financial institutions and mortgage companies operate within the geography resulting in strong competition. Several geographies throughout the MA are designated as Enterprise Zones, Redevelopment Zones, or Blighted Areas by the State of Colorado.

We performed two community contacts in the Denver MA. Identified needs include financial support and assistance for programs and organizations whose focus is the low- and moderate-income population. Needed services include affordable housing (purchasing and renting), school readiness and youth programs, and financial management education.

Colorado Springs MA

Demographic Information for Full Scope Area: El Paso County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	111	0.90	28.83	46.85	23.42	0.00
Population by Geography	516,929	0.34	26.24	47.96	25.46	0.00
Owner-Occupied Housing by Geography	124,443	0.12	19.55	49.48	30.85	0.00
Business by Geography	43,648	5.33	24.54	41.12	29.01	0.00
Farms by Geography	942	2.97	15.18	52.34	29.51	0.00
Family Distribution by Income Level	135,068	17.17	18.97	24.84	39.03	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	48,803	0.33	39.72	48.22	11.72	0.00
Median Family Income		54,037	Median Housing Value	150,592		
HUD Adjusted Median Family Income for 2006		63,100	Unemployment Rate (2000 US Census)	2.31%		
Households Below Poverty Level		8%				

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

Source: 2000 US Census and 2006 HUD updated MFI

The bank has identified El Paso County as its assessment area. El Paso County encompasses the urban metropolitan area of the Colorado Springs MA. Teller County comprises the remaining area of the Colorado Springs MA and is mostly rural. Economic conditions within the Colorado Springs MA are generally stable. The December 2006 unemployment rate for the MA was 4.2 percent. The median housing cost in 2003 (most recent available) was moderate at \$180,000.

Population growth is expected to continue due in part to the transfer of the Fourth Infantry Division with an estimated 10,000 additional troops stationed at the Fort Carson Army Base. This growth will be offset somewhat by the continued deployment of troops to the Middle East. Approximately 20 percent of the population is related to the Department of Defense (DOD). In addition to the Fort Carson Army Base there are several large military installations in the MA, including Peterson Air Force Base, Shriver Air Force Base, and the U.S. Air Force Academy. Major industries in the MA include services, retail trade, tourism, and construction. Competition from other financial institutions is strong.

We performed one community contact in this MA. The contact stated there are concerns with the increasing number of people living in poverty. There is also a need for alternative lending sources for low and moderate-income individuals. The contact felt that payday lenders are taking advantage of the low- and moderate-income population.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption 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 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.

Table 1. Lending Volume

LENDING VOLUME		Geography: COLORADO						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006				
MA/Assessment Area (2006):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Colorado Springs MA	15.58	9	631	160	28,934	0	0	19	58,115	188	87,680	38.06
Denver-Aurora MA	84.42	6	3,234	956	133,624	0	0	57	220,927	1,019	357,785	61.94

* 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 October 21, 2003 to February 05, 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: COLORADO						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	Overa II	Low	Mod	Mid	Upp
Full Review:															
Colorado Springs MA	2	50.00	0.12	0.00	19.55	0.00	49.48	100.00	30.85	0.00	0.01	0.00	0.00	0.01	0.00
Denver MA	2	50.00	1.98	0.00	22.72	0.00	41.92	0.00	33.38	100.00	0.00	0.00	0.00	0.00	0.00

^{*} 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: COLORADO						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
Full Review:															
Colorado Springs MA	7	77.78	0.12	0.00	19.55	28.57	49.48	57.14	30.85	14.29	0.04	0.00	0.00	0.08	0.00
Denver-Aurora MA	2	22.22	1.98	0.00	22.72	0.00	41.92	50.00	33.38	50.00	0.03	0.00	0.00	0.03	0.03

* 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)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: COLORADO				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans						
Full Review:																
Colorado Springs MA	0	0.00	0.12	0.00	19.55	0.00	49.48	0.00	30.85	0.00	0.00	0.00	0.00	0.00	0.00	
Denver-Aurora MA	2	100.00	1.98	0.00	22.72	0.00	41.92	0.00	33.38	100.00	0.00	0.00	0.00	0.00	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: COLORADO						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]				
	#	% of Total ^{**}	% of MF Units ^{***}	% BANK Loans ^{****}	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Colorado Springs MA	0	0.00	0.76	0.00	43.58	0.00	44.09	0.00	11.57	0.00	0.00	0.00	0.00	0.00	0.00
Denver-Aurora MA	0	0.00	8.62	0.00	41.07	0.00	41.50	0.00	8.81	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: COLORADO						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 Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Colorado Springs MA	160	14.49	5.33	3.13	24.54	36.88	41.12	36.25	29.01	23.75	0.33	0.12	0.58	0.35	0.18
Denver-Aurora MA	944	85.51	3.96	4.98	24.48	26.38	36.67	41.74	34.16	26.91	0.52	0.79	0.71	0.57	0.34

* 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: COLORADO						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	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Colorado Springs MA	0	0.00	2.97	0.00	15.18	0.00	52.34	0.00	29.51	0.00	0.00	0.00	0.00	0.00	0.00
Denver-Aurora MA	0	0.00	1.87	0.00	21.48	0.00	38.27	0.00	37.94	0.00	0.00	0.00	0.00	0.00	0.00

* 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: COLORADO						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ¹	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Colorado Springs MA	2	50.00	17.17	0.00	18.97	0.00	24.84	0.00	39.03	100.00	0.01	0.00	0.00	0.00	0.02
Denver-Aurora MA	2	50.00	18.42	0.00	18.91	0.00	23.66	0.00	39.00	100.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2005 Peer Mortgage Data (Western)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

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

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

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: COLORADO								Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ²	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
Colorado Springs MA	7	77.78	17.17	28.57	18.97	42.86	24.84	14.29	39.03	14.29	0.05	0.00	0.24	0.00	0.00
Denver-Aurora MA	2	22.22	18.42	0.00	18.91	0.00	23.66	0.00	39.00	100.00	0.03	0.00	0.00	0.00	0.07

^{*} Based on 2005 Peer Mortgage Data (Western)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: COLORADO						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2006							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ³	% BANK Loans ^{****}	% Families [*] **	% BANK Loans ^{****}	% Families [*] **	% BANK Loans ^{**} **	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Colorado Springs MA	0	0.00	17.17	0.00	18.97	0.00	24.84	0.00	39.03	0.00	0.00	0.00	0.00	0.00	0.00
Denver-Aurora MA	2	100.00	18.42	0.00	18.91	0.00	23.66	0.00	39.00	100.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2005 Peer Mortgage Data (Western)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

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

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

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

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: COLORADO			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
Full Review:									
Colorado Springs MA	160	14.34	66.34	45.63	55.63	25.00	19.38	0.33	0.29
Denver-Aurora MA	956	85.66	64.17	32.32	72.91	9.52	17.57	0.52	0.41

^{*} 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 12.19% of small loans to businesses originated and purchased by the bank.

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: COLORADO			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
Full Review:									
Colorado Springs MA	0	0.00	90.87	0.00	0.00	0.00	0.00	0.00	0.00
Denver-Aurora MA	0	0.00	88.89	0.00	0.00	0.00	0.00	0.00	0.00

^{*} 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 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: COLORADO				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)
Full Review:									
Colorado Springs MA	1	45	10	520	11	565	12.10	0	0
Denver-Aurora MA	0	0	18	4,105	18	4,105	87.90	1	292

^{*} '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: COLORADO 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
Full Review:																	
Colorado Springs MA	38.06	5	45.45	20.00	0.00	40.00	40.00	0	0	0	0	0	0	0.34	26.24	47.96	25.46
Denver-Aurora MA	61.94	6	54.55	16.67	16.67	16.67	50.00	0	0	0	0	0	0	4.75	28.69	39.19	27.25