

# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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## Public Disclosure

March 6, 2000

## Community Reinvestment Act Performance Evaluation

The Exchange National Bank of Jefferson City  
Charter Number: 13142  
520 Main Avenue  
Jefferson City, Missouri 65102

Office of the Comptroller of the Currency

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**NOTE:** 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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## General Information

*The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.*

*This document is an evaluation of the CRA performance of **The Exchange National Bank of Jefferson City** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of March 6, 2000. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Block Numbering Area (BNA)** - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

**Census Tract (CT)** - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

**Community Development (CD)** - Affordable 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.

**Full-Scope Review** - Performance under the Lending, Investment and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

**Geography** - A census tract or a block numbering area 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 applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

**Home Mortgage Loans** - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwellings loans, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

**Limited-Scope 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, branch distribution).

**Low-Income** - Income levels that are less than 50 percent of the median family income.

**Median Family Income (MFI)** - The median income determined by the United States 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 Statistical Area (MSA)** - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

**Middle-Income** - Income levels that are at least 80 percent and less than 120 percent of the MFI.

**Moderate-Income** - Income levels that are at least 50 percent and less than 80 percent of the MFI.

**Small Business Loans** - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

**Small Farm Loans** - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

**Tier 1 Capital** - The total of common shareholders' equity, perpetual preferred shareholders=equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income** - Income levels that are 120 percent or more of the MFI.

## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated "**Outstanding.**"

The following table indicates the performance level of **Exchange National Bank (ENB)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	The Exchange National Bank of Jefferson City 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.

Major factors that support this rating include:

- ENB has done a good job of responding to the credit needs of its community, as evidenced by the high level of residential and small business loans.
- A strength in ENB's performance was the distribution of its residential mortgage loans by geography and small business loans by borrower income. The bank was particularly successful at penetrating low-income geographies.
- The bank provided a community development loan that was highly responsive to the affordable housing needs of LMI families.
- The bank generated a good level of qualified community development investments. The substantial majority of investments addressed the AA's more pressing needs which include housing for LMI residents and capital for small business expansion and job creation.
- Retail delivery systems are readily accessible to geographies and individuals of different income levels.

- ENB senior management provided an excellent level of community development services in the AA.

## **Description of Institution**

The Exchange National Bank (ENB) is a full-service commercial bank headquartered in Jefferson City, Missouri. ENB is an intrastate bank and is a wholly owned subsidiary of Exchange National Bancshares, Inc. (ENBI), a \$490 million multi-bank holding company also headquartered in Jefferson City.

The bank's primary focus is traditional retail and commercial products. There are no financial or legal impediments to the bank's CRA performance. As of December 31, 1999, ENB reported total assets of \$341 million, making it the second largest locally based financial institution in Jefferson City. ENB's gross loans were \$240 million and included real estate loans \$131 million, commercial loans \$64 million, and consumer loans \$45 million. Net loans are 70 percent of total assets and Tier 1 capital was \$35 million.

The bank has four branch offices and nine automatic teller machines (ATMs) located throughout Jefferson City. ENB received a "Satisfactory" rating at its September 8, 1997 CRA examination.



## **Scope of the Evaluation**

This evaluation followed the Interagency CRA Examination Procedures for Large Retail Institutions. These procedures evaluate CRA performance using the Lending, Investment, and Service Test. We relied heavily on relevant demographic information for our analysis. For example, we compared the geographic and borrower distribution of ENB's residential mortgage loans with the distribution of owner-occupied housing and family income. Our evaluation covered activities generated between January 1, 1998 and December 31, 1999.

Although ENB is not required to report loans under the HMDA, it does collect data on the volume and distribution of its residential mortgage loans. These primarily consist of home purchase loans. In addition, the bank collects data on its residential construction loans. At management's request, we included residential construction loans in our analysis of ENB's performance.

Examiners reviewed ENB's data collection practices and sampled loans to test the accuracy of these reports and the small business/small farm loan data. We found some inaccuracies in small business loan data. However, ENB's management corrected the errors and this evaluation is based on accurate data.

## **Fair Lending Review**

We did not detect any discriminatory underwriting practices. The bank's policies, internal controls and training ensure ongoing compliance with fair lending laws. We examined for compliance with the Equal Credit Opportunity Act and the Fair Housing Act during this CRA examination. We reviewed the bank's policies and procedures to identify areas of noncompliance. We sampled residential mortgage and installment loan files to ensure applicants were treated in a nondiscriminatory manner.

## Conclusions with Respect to Performance Tests

### LENDING TEST

The bank's lending volume reflects good response to community credit needs and is consistent with its business focus. ENB provided 1,271 residential mortgage loans totaling \$100.6 million. Because ENB is not a HMDA reporter, market share data is not available. ENB originated 498 small business loans totaling \$59.4 million. In 1998, the bank ranked sixth by number and fifth by dollar amount in market share for small business loans in its AA. Among local financial institutions, ENB ranked third by number and dollar amount in market share for small business loans. As of June 30, 1999, ENB bank ranked third in deposit market share among financial institutions in its AA.

The substantial majority of ENB loans originate within its AA. The bank originated 98 percent of its residential mortgage loans and 100 percent of its residential construction, small business, and small farm loans within its AA.

The small farm lending activity represents less than two percent of the number and one percent of the dollars for total reported loans in this AA. Consequently, we did not include these loans in our analysis of ENB's CRA performance.

See Table 1 in the Appendix section for facts and data used to evaluate the bank's lending activity.

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

**Residential Mortgage Loans:** The bank's geographic dispersion of residential mortgage loans was excellent. The AA contains just one low-income CT and does not contain any moderate-income CTs. The bank's percentage of loan originations in low-income CTs (2.28 percent) exceeds the percentage of owner-occupied housing units (1.10 percent) located in this area.

**Residential Construction Loans:** ENB achieved an excellent penetration in its low-income CT. The bank originated 5.62 percent of its residential construction loans in its low-income CT, which is substantially higher than the demographic comparison.

**Small Business Lending:** ENB's geographic distribution of small business loans shows good penetration throughout the AA. Penetration in the low-income CT was

good with 11.85 percent of ENB's loans made in these areas compared to 15.55 percent of small businesses located in these areas. Also, the bank's market share in low-income CTs (6.16 percent) compared favorably with its overall market share of 7.70 percent.

Also, our analysis of the geographic dispersion of ENB's loan originations indicates there are no conspicuous gaps in the geographic distribution of the bank's loans. The bank successfully penetrated all geographies within its AA. This further demonstrates that ENB did an excellent job of distributing loans throughout its AA and ensuring that no areas were underserved.

See Tables 2 through 5 in the Appendix for facts and data used to evaluate the geographic distribution of residential and small business loans.

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

**Residential Mortgage Loans:** Overall, the bank achieved a good borrower distribution of residential loans. ENB's lending to moderate-income borrowers is excellent at 10.54 percent. This compares favorably with the 10.45 percent for families in that income category.

For low-income borrowers, ENB's penetration was less than comparable demographic data. However, this is mitigated as 68 percent of low-income households live below the poverty level. According to the Chamber of Commerce, the median housing value is \$61,500 and the median household income in Jefferson City is \$27,597. Households with annual incomes below 50 percent of the median would have difficulty purchasing housing in this market. In addition, our community contacts listed affordable rental housing as a primary credit need for low-income residents.

**Small Business Loans:** The distribution of small business loans is excellent. The bank originated 70 percent of its small business loans to firms with revenues of \$1 million or less. ENB's penetration exceeded the level of businesses in that range and the aggregate data for other reporting institutions. In addition, 70 percent of ENB's small business loans were less than \$100 thousand in size. The bank's market share for loans to businesses with revenues of \$1 million or less was 8.48 percent compared to an overall market share of 7.70 percent.

See Tables 7 through 10 in the Appendix for facts and data used to evaluate the borrower distribution of the bank's residential mortgage and small business loans.

### **Community Development Lending**

In addition to residential mortgage, residential construction and small business loans, ENB originated a \$614 thousand community development loan. The loan funds construction of 45 units of affordable LMI rental housing in the AA. The development is a project of the local housing authority and a consortium of four other local financial institutions. Once completed, half of the units will be occupied by tenants receiving rental assistance and the remaining units will be occupied by families with incomes at 60 percent or less of the median family income.

**Product Innovation and Flexibility:** ENB offers a number of loan products with flexible features to meet AA credit needs. Its most successful product is a state-sponsored loan program that targets LMI first-time home buyers. Among other features, these products have low down payment requirements and below market interest rates for qualified applicants. During 1999, ENB originated 43 first-time homebuyer loans totaling \$2.7 million. These loans are included in the totals for residential mortgage loans.

## INVESTMENT TEST

ENB originated a good volume of community development investments during this evaluation period totaling \$1.1 million. The bank's investments were targeted at the most pressing community development needs among LMI residents and geographies.

The level of opportunities to make qualified investments in the AA is low. We did not find any community development corporation, small business investment company or other community development financial institution operating in the AA.

Major investments include:

- \$500,000 in low-income housing tax credits to provide permanent financing for a 45-unit housing development under construction in Jefferson City. This unfunded commitment is part of a \$6 million project by the local housing authority to address the shortage of affordable rental housing for very low-income residents.
- \$300,000 in special tax credits used to finance the relocation of a local printing business to a new plant in Jefferson City. The investment allowed this small business to expand into new facilities and helped keep jobs for LMI workers in an area targeted for economic development by city government.
- \$200,000 investment in low-income housing tax credits. This limited partnership developed 24 units of low-income housing in Jefferson City.
- \$56,000 in charitable donations in support of community development activities to several nonprofit organizations. These organizations provide a number of services for LMI residents including home building, job counseling, food and clothing distribution, free medical and dental care, and rental assistance.

See Table 12 in the Appendix for facts and data used to evaluate the bank's level of qualified investments.

## SERVICE TEST

**Retail Banking Services:** ENB has an excellent branch and ATM distribution, and its retail banking services are readily accessible to all portions of the AA. The bank has four branches and nine ATMs, with one branch and one ATM located in the AA's low-income CT. This distribution substantially exceeds the percentage of the population in that CT. The majority of ENB's branches and ATMs, 50 percent and 55 percent respectively, are in upper-income CTs, which contain 65 percent of low-income families and 73 percent of moderate-income families.

ENB provides reasonable hours and services at all branch locations. Bank lobby hours are generally 9:00 a.m. to 4:30 p.m. All locations provide expanded hours 7:30 to 6:00 p.m. on Mondays and offer Saturday hours. Since our previous CRA examination, the bank has not opened or closed any branch offices.

The bank offers an array of products and services that are consistent with its size, resources, and overall business strategy, including free checking accounts with no minimum balance.

See Table 13 in the Appendix for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

**Community Development Services:** ENB provides an excellent level community of development services. Examples include:

- Several senior bank officers serve on the board of a local nonprofit agency that provides emergency services to LMI residents. Services include food, clothing, housing, employment search and medical services. The bank's officers are actively involved in the center's fund-raising, budgeting, and marketing efforts.
- A senior bank officer serves on a task force working to develop a comprehensive drug and alcohol treatment facility for LMI residents. Feedback from residents and social service providers convinced community leaders of the need for these specialized medical services targeted at LMI residents. The bank officer is using his financial expertise to lead the group's efforts at securing funding for the proposed facility.
- A senior bank officer working with the Jefferson City economic development office developed a special program to repair LMI housing in blighted areas. The Community Development Block Grant program combines grant money from the U.S. Department of Housing and Urban Development with bank loans to provide low-cost funds for basic home improvements. These improvements include

roofing, plumbing, heating, electrical, window replacement, and siding. Participants must meet LMI guidelines. In addition to developing acceptable program guidelines to secure the grant money, the ENB officer obtained commitments from nine area financial institutions to participate.

- ENB provides free disbursement services on a local LMI housing complex in the AA. This was the largest private sector low-income housing project ever developed in Jefferson City with 24 three-bedroom apartments. Bank senior management prepared all construction draws, maintained all accounting records, and prepared the required documentation for certified audits. ENB's service was not a cash contribution, but it allowed the developers to realize \$40,000 in cost savings for the project.
- A senior bank officer serves on the board of a local group that builds single family homes for low-income families. The officer used his financial expertise to help the group obtain a two-year, \$20,000 grant from the Federal Home Loan Bank to construct four new homes in the AA. The grants are deposited and disbursed through ENB.

## Appendix A: Scope of Evaluation

The following table identifies the time period covered in this evaluation, affiliate activities reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received a comprehensive examination review (designated by the term **AFull-Scope@**) and those that received a less comprehensive review (designated by the term **ALimited-Scope@**).

<b>Time Period Reviewed</b>	Lending Test: January 1, 1998, to December 31, 1999 Investment Test: January 1, 1998, to December 31, 1999 Service Test: January 1, 1998, to December 31, 1999	
<b>Financial Institution</b>		<b>Products Reviewed</b>
The Exchange National Bank of Jefferson City (ENB) Jefferson City, Missouri		Residential Mortgage Loans, Residential Construction Loans, Small Business Loans, Community Development Loans
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Jefferson City AA	Full-Scope	



## Appendix B: Market Profile for Full-Scope Areas

### Jefferson City Assessment Area

Demographic Information for Full-Scope Area: Jefferson City AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	25	4.00	0.00	16.00	72.00	8.00
Population by Geography	153,296	2.60	0.00	15.93	79.34	0.00
Owner-Occupied Housing by Geography	25,114	1.10	0.00	14.76	84.14	0.00
Businesses by Geography	4,225	15.55	0.00	24.40	60.05	0.00
Farms by Geography	555	1.08	0.00	19.82	79.10	0.00
Family Distribution by Income Level	25,177	9.55	10.45	18.30	61.70	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	5,034	5.64	0.00	25.37	68.99	0.00
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$35,387 = \$35,492 = 8.97%	Median Housing Value Unemployment Rate				= \$53,924 = 1.99%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 1999 HUD updated MFI.

The bank's AA consists of 25 CTs and BNAs in and around Jefferson City, Missouri. This AA includes all CTs in Cole County, the southern part of Callaway County, the western portion of Osage County, two BNAs in Moniteau County, and one CT in Boone County. The AA has one low-income CT, no moderate-income CTs, and two CTs with no income designation, both of which contain state prisons. The bank has four branches and nine ATMs in the AA. The AA meets the requirements of the CRA and does not exclude any LMI geographies.

The area's economy is robust with unemployment at 1.99 percent. Jefferson City, the capital of Missouri, benefits from the stability provided by state government that employs 15,000 workers in the AA. Other large employers include health care facilities, employing 1,946; a book and magazine distribution center, employing 1,800; an underground transformer manufacturer, employing 800; and a health and beauty products manufacturer, employing 625 people.

ENB faces strong competition from thirteen banks and several local credit unions.

As of June 30, 1999, ENB held the third largest deposit market share in the AA at 17.72 percent. Central Trust Bank of Jefferson City held the largest deposit market share at 36.35 percent, followed by Jefferson Bank of Missouri at 19.47 percent.

In addition to conducting two community contacts, we reviewed information contained in the CRA performance evaluations of other local financial institutions in Jefferson City to better understand the credit, investment, and service needs within the AA. These included groups that focus on housing and economic development and government agencies. Funding for affordable LMI housing and small business financing were most often mentioned as primary credit needs. Opportunities for investment include LMI housing partnerships, tax credit projects for economic development and job creation, and nonprofit community organizations.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

References to the **Abank** include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Evaluation). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations/purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; 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 MSA/assessment area.

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 MSA/assessment area.
- 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 rank and 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 Refinance Loans** - See Table 2.
- Table 5. 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 rank and market share information based on the most recent aggregate market data available.
- Table 6. 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 rank and market share information based on the most recent aggregate market data available.

- Table 7. 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 MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** - See Table 7.
- Table 9. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 10. 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. The table also compares the bank's percentage distribution with the percentage of loans originated and purchased by all other small business reporters in the bank's AA to businesses with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 11. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank's AA to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/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 have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.
- Table 13. Distribution of Branch and ATM Delivery System** - Compares the percentage distribution of the number of the bank's branches and ATMs in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography in each MSA/AA.

**Table 1. Lending Volume**

LENDING VOLUME													State: Missouri		Evaluation Period: January 1, 1998 TO December 31, 1999	
MSA/Assessment Area:	% of Rated Area Deposits in MSA/AA*	Residential Mortgages		Small Loans to Businesses		Small Loans to Farms		Community Development		Total Reported Loans		% of Rated Area Loans (#) in MSA/AA				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)					
Full-Scope:																
Jefferson City AA	100	1,271	100,645	498	59,388	23	687	1	614	1,793	161,334	100				

\* Deposit data as of June 30, 1999.

**Table 2. Geographic Distribution of Residential Mortgage Loans**

Geographic Distribution: RESIDENTIAL MORTGAGE																	State: Missouri		Evaluation Period: January 1, 1998 TO December 31, 1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Residential Mortgage Loans					
	% 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	#	% of Total**				
Full-Scope:																				
Jefferson City AA	1.10	2.28	0.00	0.00	14.76	10.86	84.14	86.70	NA	NA	NA	NA	NA	NA	1,271	67.53				

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT																
State: Missouri				Evaluation Period: January 1, 1998 TO December 31, 1999												
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans	
	% 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	#	% of Total**
Full-Scope:																
Jefferson City AA	1.10	NA	0.00	NA	14.76	NA	84.14	NA	NA	NA	NA	NA	NA	NA	NA	NA

(\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.  
 (\*\*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE																
State: Missouri				Evaluation Period: January 1, 1998 TO December 31, 1999												
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans	
	% 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	#	% of Total**
Full-Scope:																
Jefferson City AA	1.10	NA	0.00	NA	14.76	NA	84.14	NA	NA	NA	NA	NA	NA	NA	NA	NA

(\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.  
 (\*\*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

**Table 5. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES																State: Missouri		Evaluation Period: January 1, 1998 TO December 31, 1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans				
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**			
Full-Scope:																			
Jefferson City AA	15.55	11.85	0.00	0.00	24.40	15.32	60.05	75.90	6	7.70	6.16	NA	3.70	13.95	498	26.46			

(\*) Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.

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

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

Geographic Distribution: SMALL LOANS TO FARMS																State: Missouri		Evaluation Period: January 1, 1998 TO December 31, 1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans				
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**			
Full-Scope:																			
Jefferson City AA	1.08	0.00	0.00	0.00	19.82	21.74	79.10	78.26	9	1.90	0.00	0.00	0.00	1.90	23	1.22			

(\*) Based on 1998 Aggregate Small Farm Data only. Market rank is for all income categories combined.

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



**Table 7. Borrower Distribution of Residential Mortgage Loans Table**

Borrower Distribution RESIDENTIAL MORTGAGE LOANS State: Missouri Evaluation Period: January 1, 1998 TO December 31, 1999																
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Geography*					Total Residential Mortgage Loans	
	% of Families	% BANK Loans	% of Families	% BANK Loans	% of Families	% BANK Loans	% of Families	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full-Scope:																
Jefferson City AA	9.55	3.07	10.45	10.54	18.30	22.97	61.70	63.41	NA	NA	NA	NA	NA	NA	1,271	67.53

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

Borrower Distribution: HOME IMPROVEMENT State: Missouri Evaluation Period: January 1, 1998 TO December 31, 1999																
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Improvement Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full-Scope:																
Jefferson City AA	9.55	NA	10.45	NA	18.30	NA	61.70	63.41	NA	NA	NA	NA	NA	NA	NA	NA

(\*) As a percentage of loans with borrower income information available.  
 (\*\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.  
 (\*\*\*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE																
					State: Missouri				Evaluation Period: January 1, 1998 TO December 31, 1999							
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total***
Full-Scope:																
Jefferson City AA	9.55	NA	10.45	NA	18.30	NA	61.70	NA	NA	NA	NA	NA	NA	NA	NA	NA

(\*) As a percentage of loans with borrower income information available.

(\*\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

(\*\*\*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

**Table 10. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES										
			State: Missouri			Evaluation Period: January 1, 1998 TO December 31, 1999				
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Loans to Businesses	
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total*****
Full-Scope:										
Jefferson City AA	68.47	70.08	69.18	70.28	17.07	12.65	7.70	8.48	498	26.46

(\*) Businesses with revenues of \$1 million or less as a percentage of all businesses.  
 (\*\*) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. Information was available for 100% of small loans to businesses originated and purchased by the bank.  
 (\*\*\*) The market consists of all other Small Business reporters in the MSA/AA and is based on 1998 Aggregate Small Business Data only.  
 (\*\*\*\*) Based on 1998 Aggregate Small Business Data only.  
 (\*\*\*\*\*) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

**Table 11. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS State: Missouri Evaluation Period: January 1, 1997 TO December 31, 1999										
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans	
	% of Farms*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total*****
Full-Scope:										
Jefferson City AA	98.74	95.65	91.59	91.30	8.70	0.00	1.90	2.04	23	1.22

(\*) Farms with revenues of \$1 million or less as a percentage of all farms.  
 (\*\*) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. Information was available for 100% of small loans to farms originated and purchased by the bank.  
 (\*\*\*) The market consists of all other Small Farm reporters in the MSA/AA and is based on 1998 Aggregate Small Farm Data only.  
 (\*\*\*\*) Based on 1998 Aggregate Small Farm Data only.  
 (\*\*\*\*\* ) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS State: Missouri Evaluation Period: January 1, 1998 TO December 31, 1999									
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$	#	\$ (000's)
Full-Scope:									
Jefferson City AA	0	0	4	556	4	556	100	1	500

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

(\*\*) Unfunded Commitments means legally binding investment commitments reported on the Report of Condition Schedule-L Off Balance Sheet Items.

**Table 13. Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM				State: Missouri				Evaluation Period: January 1, 1998 TO December 31, 1999									
MSA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of BANK ATMs	% of BANK ATMs	Location of ATMs by Income of Geographies				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
Jefferson City AA	100.00	4	100.00	25.00	0.00	25.00	50.00	9	100.00	11.11	0.00	33.33	55.55	2.60	0.00	15.93	79.34