



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

July 7, 2003

# **Community Reinvestment Act Performance Evaluation**

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

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Kansas City, MO 64106**

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**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 **Satisfactory**.

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

Performance Levels	UMB Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	<b>X</b>		
Low Satisfactory		<b>X</b>	<b>X</b>
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 achieved excellent lending test performance in the Kansas City MA and good performance in the St. Louis MA, the state of Kansas, and the state of Oklahoma. These areas collectively account for 85 percent of UMB's deposits. Lending test performance in the state of Missouri and the state of Illinois is adequate.
- Community development lending activity was positively considered in the Kansas City MA, the St. Louis MA, and the state of Oklahoma. The bank's overall responsiveness is good given its size, lending capacity, and opportunities.
- UMB provided a good level of qualified investments in the Kansas City MA and the state of Missouri. Current and prior period investments addressed redevelopment activities and affordable housing needs in their respective markets. Investment performance in the St. Louis MA and the state of Kansas is adequate. Performance in the state of Illinois and the state of Oklahoma is poor.
- UMB's service delivery systems provide reasonable access to low- and moderate-income geographies and individuals. The Kansas City MA and St. Louis MA received the most weight in the Service Test because 55 percent of the bank's branches are located in these markets. Bank personnel provided their financial expertise through participation in community development services in each rated area.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Block Numbering Area (BNA):** A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

**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 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 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).

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

**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 primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

**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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

**Upper-Income:** Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

## Description of Institution

UMB Bank, National Association (UMB) is a \$6 billion interstate financial institution headquartered in Kansas City, Missouri. UMB is a wholly owned subsidiary and serves as the lead bank of UMB Financial Corporation (UMBFC), Kansas City, Missouri, a \$7 billion regional, multi-bank holding company. UMBFC owns and operates four other national banks, one credit card bank, and one trust company, with 156 locations throughout Missouri, Kansas, Illinois, Oklahoma, Nebraska, and Colorado. Additionally UMBFC owns the UMB Community Development Corporation (UMB CDC). The UMB CDC was designed to provide low-cost mortgages to developers for the purpose of rehabilitation of distressed properties and to low- and moderate-income persons for the purpose of home improvement of owner-occupied housing.

UMB is a full-service banking institution offering a wide range of products for individuals and businesses. Significant business lines include investment and cash management services, trust services for individuals and corporations, correspondent banking activity, and international banking services. The bank's primary lending focus is commercial loans followed by consumer loans. The following financial information is reported as of June 30, 2003: The loan portfolio totaled \$2 billion and was comprised of 60 percent commercial and commercial real estate loans, 24 percent loans to individuals, 6 percent residential real estate loans, 4 percent loans to financial institutions, 2 percent agriculture loans, and 4 percent other loans. Net loans represent 47 percent of total deposits and 37 percent of the bank's asset base. Tier 1 capital totaled \$481 million.

UMB operates 124 banking offices throughout its 20 assessment areas (AAs) in four states – Missouri, Kansas, Illinois, and Oklahoma. The AAs consist of two multistate metropolitan areas in Kansas City and St. Louis; eight other metropolitan areas in Joplin, Columbia, Springfield, and St. Joseph in Missouri, Topeka, Lawrence, and Wichita in Kansas, and Oklahoma City and Tulsa in Oklahoma; and nine other non-metropolitan areas in Missouri, Kansas, and Illinois. We did not evaluate the bank's performance in the Tulsa market due to the short period of time the branch was in operation during the evaluation period. Refer to appendix A for additional details on the non-metropolitan areas. Approximately 78 percent of the bank's deposits and 55 percent of loan originations (including consumer loans) were attributed to locations in the metropolitan areas of Kansas City and St. Louis. No mergers or acquisitions occurred during the evaluation period.

UMB has the financial capacity to assist in meeting its communities' credit needs. There are no known legal or financial constraints that could impede its CRA efforts. UMB received a "Satisfactory" rating on its last CRA evaluation dated May 22, 2000.



## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for the lending test, including community development loans, is January 1, 2000 through December 31, 2002. Products reviewed in the lending test include home mortgage, small business, small farm, and at the bank's option, consumer loans. We amended the evaluation period for consumer loans to exclude originations in calendar year 2000 due to data collection errors. Refer to the Data Integrity section for complete details. We used 2001 peer lending data, the most recent data available, for home mortgage, small business, and small farms to compare UMB's lending performance to other reporting lenders in the AAs. Since the collection of consumer loan data is optional, there is no information available to compare this product with other lender's performance.

The weight given to consumer loans is based on an annualized dollar distribution of all loans considered in this evaluation. Other loan products are weighted based on the distribution of "reported" loans by number (i.e. small business, small farm and home mortgage loans). A weighting based entirely on the number of loans would have disproportionately emphasized consumer lending.

Our full-scope analysis includes farm loan distributions only in the Joplin MA. Farm lending is not significant to the bank's performance in the other full-scope AAs.

Our analysis does not include multifamily home mortgage or small business real estate secured loans. The number of reported and collected loans by these product types is insufficient for meaningful analysis in all AAs.

The evaluation period for the investment and service tests is May 23, 2000 through July 7, 2003. At the bank's request, we considered qualified investments made by its affiliates.

We used deposit information, reported to the Federal Deposit Insurance Corporation annually, to determine the bank's deposit market share and market presences within its AAs. The most recent deposit information available is as of June 30, 2002.

### Data Integrity

To assess the accuracy of the data, we conducted an independent test of data for home mortgage, small business, small farm, and consumer loan products. We identified a material error in the collection of consumer loan data for calendar year 2000 which resulted in an error rate in excess of 5 percent. Because the evaluation of consumer lending is optional, management elected to exclude the calendar year 2000 consumer loan data from the evaluation. We determined the remainder of the loan data to be substantially accurate and it is used without exception in this evaluation.

We reviewed 100 percent of the bank's community development loans, investments, and services. We determined the bank did not properly report 47 percent of the community development loans presented for consideration, and 14 percent of the loans were erroneously included in the small business lending data. Only those activities that qualified are presented and considered in this evaluation.

### **Selection of Areas for Full-Scope Review**

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

### **Ratings**

The bank's overall rating is a blend of the multistate metropolitan area ratings and state ratings. We weighted the bank's CRA performance in the Kansas City multistate metropolitan area most heavily because it constitutes 62 percent of the bank's total deposit base, and 29 percent of loan originations (including consumer loans) during this evaluation period, and is the bank's headquarters. The St. Louis multistate metropolitan area followed by the state of Missouri, received the next highest weightings. The St. Louis multistate metropolitan area represents 16 percent of total deposits and 26 percent of loan originations. The state of Missouri represents 14 percent of total deposits and 33 percent of loan originations. The St. Louis multistate metropolitan area received slightly more weight over the state of Missouri because it represents a larger concentration of loans, deposits, and branches in one AA whereas activity within the state of Missouri is widespread over ten different AAs. Additionally, management considers the St. Louis AA a key market in terms of its operations. The states of Kansas, Oklahoma, and Illinois received the least weight in our analysis. Kansas represents four percent of deposits and seven percent of loan originations, Oklahoma represents three percent of deposits and four percent of loan originations, and Illinois represents less than one-half of one percent of both deposits and loan originations.

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

### **Inside/Outside Ratio**

For the geographic distribution analysis under the Lending Test, we performed an inside/outside ratio analysis at the bank level. A substantial majority of bank's loans by number, 85 percent, are inside its AAs. By product type 92 percent of home mortgage loans, 91 percent of small business loans, 88 percent of farm loans, and 81 percent of consumer loans originated to borrowers inside the bank's AAs. We viewed this as a positive characteristic in our analysis of lending performance.

### **Other Loan Data**

The bank refinanced two lines of credit, totaling \$19 million, to a military lending organization that uses the facilities to provide consumer loans to active and retired military personnel. A substantial majority of borrowers are enlisted military personnel who have low- and moderate-incomes. This activity benefits low- and moderate-income individuals across the country, including the bank's AAs. We positively considered this information in the consumer lending analysis.

### **Fair Lending Review**

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

## Multistate Metropolitan Area Rating

### Kansas City Multistate Metropolitan Area

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

**The lending test is rated: Outstanding**

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

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

The major factors that support this rating include:

- Lending test performance in the Kansas City MA is excellent as evidenced by an adequate level of lending activity, good overall geographic distribution, and good overall borrower income distribution. The level of community development lending is high and positively impacted the bank's lending performance.
- UMB demonstrated good responsiveness to community development needs with a high level of qualified investments. A substantial majority of the investment dollars continues to support a complex redevelopment plan initiated during a prior evaluation period.
- Branch distribution is reasonably accessible to geographies and individuals of different income levels. Bank personnel provided a good level of community development services during this evaluation period.

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

UMB operates 41 branch offices and 84 ATMs in the Kansas City MA. The primary business focus is commercial lending, although by number, consumer loans represent the largest volume of lending activity. The Kansas City MA represents 62 percent of the bank's deposit base and 29 percent of loan originations (including consumer loans). UMB ranks second in deposit market share among 111 other financial institutions in the AA. Bank deposits total \$2.9 billion and represent 11 percent of the area deposits. Competition for banking services in this AA is strong. Primary competitors include Bank of America and Commerce Bank, which held deposit market shares of 12 and 10 percent respectively.

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

We conducted three community contacts in the Kansas City MA with representatives of city and county governments and with a local economic development corporation. Identified community credit needs within the AA include small business financing, home improvement, affordable housing, and financial literacy programs for a growing Hispanic population.

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

## **LENDING TEST**

The bank's performance under the Lending Test is rated "Outstanding."

Our analysis gave the most weight to business loans, followed by home mortgage and consumer loans. Business loans and home mortgage loans respectively account for 59 percent and 39 percent of the bank's reported loans (by number) over the evaluation period. Consumer loans represent 25 percent of the bank's loan volume (annualized by dollar) over the evaluation period. An analysis of UMB's small farm lending is not meaningful since this loan type represents less than two percent of its reported loans in the Kansas City MA. Small farm loans are not an identified credit need for this predominately metropolitan area.

### **Lending Activity**

Refer to Table 1 Lending Volume and Table 1a Other Products, in the Multistate Metropolitan Areas section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect adequate responsiveness in relation to area credit needs and the bank's deposit market share. UMB is a leader in home improvement lending. Of all HMDA data reported in the Kansas City MA for the year 2001, UMB ranked 2<sup>nd</sup> in home improvement loans, 58<sup>th</sup> in home purchase loans (13<sup>th</sup> among local lenders) and 80<sup>th</sup> in refinance loans (17<sup>th</sup> among local lenders). Of all CRA data reported in the Kansas City MA for the year 2001, UMB ranked 10<sup>th</sup> in reported business loans (4<sup>th</sup> among the 30 local CRA-data reporting lenders).

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

The overall geographic distribution of loans is good.

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

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

The geographic distribution of reported home mortgage loans is good. Home improvement loans received the most weight in our analysis, followed by refinance and home purchase loans. These loans respectively represent 68, 19, and 13 percent of the bank's home mortgage lending (by number) in this area.

Performance in the moderate-income areas is good. The distribution in moderate-income areas ranges from somewhat lower- to lower than the demographic comparator. However, the market share in moderate-income tracts consistently exceeds the bank's overall market share. Among local lenders for the year 2001, UMB ranked first in home improvement lending to moderate-income tracts, 11<sup>th</sup> in refinance loans, and 14<sup>th</sup> in home purchase loans.

Performance in low-income areas is good given the high poverty rate for families of 35 percent in these areas. Low-income tract distribution ranges from lower than- to near to- the demographic comparator, but low-income tract market shares consistently meet or exceed the bank's overall market shares. Among local lenders for the year 2001, UMB ranked second in home improvement lending to low-income tracts, fourth in refinance loans, twelfth in home purchase loans.

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

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

Performance in the low- and moderate-income geographies is excellent. Distribution in both the low- and moderate-income tracts exceeds demographics and market share in these tracts exceeds the bank's overall share of reported business loans.

### ***Consumer Loans***

Refer to Table 13 in the Multistate Metropolitan Areas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Performance in both the low- and moderate-income geographies is very poor, even after considering the level of households below poverty in these tracts. Both distributions are significantly lower than the demographic comparator.

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

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

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

We performed an analysis of the inside/outside ratio at the bank level. A substantial majority of the loans were inside its AAs. Refer to the Scope of the Evaluation section for additional details.

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

The overall borrower distribution of loans is good.

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

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

The distribution of home mortgage loans to borrowers of different income levels is excellent. Performance with moderate-income borrowers is excellent. Moderate-income distributions consistently exceed the demographic comparator. Market share in the moderate-income tract exceeds the bank's overall market share for home improvement and home refinance loans and is lower than the overall market share for home purchase loans.

Performance with low-income borrowers is excellent given the family poverty rate of seven percent in the AA. Performance is particularly strong in the home improvement and refinance products where low-income market shares meet or exceed the bank's overall market shares. For home purchase loans, market share to low-income borrowers is lower than the bank's overall market share.

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

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

The distribution of loans to businesses of different sizes is adequate. The percentage of loans to small businesses (i.e. those with gross annual revenues of \$1 million or less) is lower than the demographic comparator; but the bank's market share of such loans is near to its overall market share. Among local lenders for the year 2001, UMB ranked fifth in reported loans to small businesses in the area.

## **Consumer Loans**

Refer to Table 13 in the Multistate Metropolitan Areas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to borrowers of different income levels is good. Performance with moderate-income borrowers is good and slightly exceeds the demographic comparator. Performance is not as strong to low-income borrowers, but still reasonable given a household poverty rate of 10 percent in the AA.

## **Community Development Lending**

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

Our analysis gave positive consideration to community development lending activities. The bank's responsiveness is excellent given its size, lending capacity and area opportunities. UMB originated 40 community development loans totaling \$67 million over the evaluation period, including:

- 14 loans totaling \$55 million that revitalize/stabilize low- and moderate-income areas;
- 19 loans totaling \$11 million to organizations that provide social services targeted to low- and moderate-income individuals; and,
- 7 loans totaling \$1 million for the acquisition, construction, or rehabilitation of affordable housing for low- and moderate-income families.

UMB originated another 18 community development loans totaling \$3 million that are not reflected above because they were erroneously included in the bank's small business loan data.

## **Other Data**

We also gave positive consideration to other loan data submitted by the bank:

- UMB extended two community development leases totaling \$4.4 million to organizations that provide social services to low- and moderate-income individuals.
- The bank provided a \$165 thousand letter of credit to an organization that provides affordable housing for low- and moderate-income families.
- UMB made three loan commitments totaling \$3.2 million to organizations that provide social services targeted to low- and moderate-income individuals.



## INVESTMENT TEST

The bank's performance under the Investment Test is rated "High Satisfactory." Refer to Table 14 in the Multistate Metropolitan Areas section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

UMB and its affiliates provided a good level of qualified investments in the Kansas City MA. A substantial majority of the investment dollars continues to support a complex redevelopment plan the bank initiated during a prior evaluation period. Current period investments total \$908 thousand. During the evaluation period, UMB underwrote and purchase two bond issuances totaling \$430 thousand and made charitable contributions totaling \$478 thousand. Current period investments include:

- Two bond issuances totaling \$430 thousand, for the Kansas City Area Transportation Authority (KCATA). Proceeds were used to purchase new equipment for public buses. The equipment was necessary to keep the buses in service and update the transportation system. These investments help provide a basic community service that serves a large portion of low- and moderate-income people in the Kansas City area. KCATA conducted a survey during December 2002, which demonstrates that the majority of its riders are low- and moderate-income people. Approximately 66 percent of people surveyed reported an annual household income of less than \$50 thousand, and 31 percent report an annual household income of less than \$20 thousand.
- UMB made 38 qualified charitable contributions totaling \$358 thousand. The majority of these assist organizations that provided needed services to low- and moderate-income individuals. Additionally, the bank provided free office space in downtown Kansas City to the Small Business Administration One Stop Capital Shop. This facility provided technical assistance and financing for small businesses. The office is now closed. The market value of the office space for this in-kind contribution is \$120 thousand.

While the types of investments made in the current period are responsive to community development needs, and the underwriting of bonds exhibits some degree of complexity, these investments do not reflect strong leadership given UMB's size and resources in Kansas City. Community contacts and contextual research identified ample opportunities to participate in community development activities in the Kansas City MA.

The amount of qualified investments outstanding from the prior period is high. Approximately 91 percent of these dollars, \$39 million, represents a continued investment in the UMB Bank Technology Center. UMBFC, acting as its own developer, initiated a complex project in 1997 in response to the Tax Increment Financing Commission's (TIF) public request for redevelopment in the core downtown of Kansas City, Missouri. The TIF program offers tax incentives for projects in areas that are blighted and have a reduced level of population or real property value. A portion of the taxes paid during the life of the TIF (up to 23 years) are directed to the Economic Development Corporation of Kansas City (EDC) in the form of annual revenue. The EDC provides funding to the TIF program each year, which in turn allows for further development activities throughout Kansas City.

The Kansas City Planning and Development Department identified the area of redevelopment in the core downtown as the Civic Mall project. The development activities were part of a multi-faceted project that involved the construction of three new office buildings housing the Federal Aviation Administration (FAA), the Federal Court House, and the Technology Center. The Technology Center was the first major development activity to be completed on the Civic Mall, in 1999. The other major redevelopment activities that began in the prior evaluation period were completed during this evaluation period. The development of the Technology Center resulted in the retention of approximately 750 full and part-time jobs in downtown Kansas City, the majority of which are in the low- and moderate-income wage level. The FAA and the Federal Court House have a combined employment of 1,350 people.

The core downtown of Kansas City comprises six census tracts; two middle-, one moderate-, and two tracts with no income level designation. The Technology Center is in a middle-income tract and is adjacent to a moderate-income tract and a tract with no income designation. This area is designated as an enhanced enterprise zone by the city. At the time UMB initiated its redevelopment project, most of the buildings within the redevelopment area were considered obsolete and outdated, exhibited varying degrees of blight, and were considered an economic liability to the community. Six years after the initial development activities began on the Civic Mall, ongoing economic improvements to the immediate area are visibly evident. The construction of new parking facilities, building renovations, and streetscape improvements further compliment these redevelopment activities. Property values are increasing in the area and the 2000 census information shows an increase in population, income, and employment, and a reduction in the poverty rate. According to the TIF Commissioner, no further blight has occurred in the immediate area.

Other prior period investments include:

- UMB Capital Corporation (UCC), a wholly owned subsidiary of the bank, is a licensed Small Business Investment Company (SBIC), whose primary purpose is to provide equity capital and long-term financing to small businesses. UCC primarily serves the Kansas City AA. The UCC has total assets of \$3.2 million of which \$2.4 million represents a due from bank account held at UMB. This investment continues to have an impact in serving community development needs. The SBIC

originated five loans during the evaluation period. Total loans outstanding are \$788 thousand.

- UMB Community Development Corporation (CDC), a subsidiary of UMBFC, has total assets of \$1.6 million. Primary assets include a \$426 thousand due from bank account held at UMB and a \$1 million account receivable from UMBFC. The assets of the CDC are allocated to each affiliate bank primarily based on the percentage of deposits held at each bank. The allocated portion to UMB is \$1.3 million, which is further distributed among all of the AAs. In the Kansas City AA, the allocated portion of the CDC is \$423 thousand. The CDC was reactivated in April 2000 with the intent of providing low-cost home improvement loans to low- and moderate-income borrowers. The CDC has not been particularly active during the evaluation period originating only three loans, none of which are in the Kansas City AA.

## **SERVICE TEST**

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

### **Retail Banking Services**

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

The percentage of branches in low-income tracts is slightly less than the percentage of population in those tracts. The percentage of branches in moderate-income tracts is significantly less than demographics. Of the 36 branches in middle- or upper-income tracts, 11 are adjacent to low- and moderate-income tracts. In addition, there are two branches in tracts with no income level designation in the business district of Kansas City. These branches help provide reasonable access to residents in adjoining low- and moderate-income tracts.

During the evaluation period, UMB opened one and closed four branches. Branch openings and closings did not adversely affect the accessibility of the bank's delivery systems. None of the opened or closed branches are in low- and moderate-income tracts.

The percentage of ATMs in low-income tracts is slightly less than the percentage of population in those tracts. The percentage of ATMs in moderate-income tracts is significantly less than demographics. Of UMB's 72 ATMs in middle- or upper-income tracts, 23 are adjacent to low- and moderate-income tracts, which helps provide reasonable access to these areas.

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

Other alternative delivery systems offered by UMB include:

- Electronic banking: Customers can access deposit accounts to check balances, view transactions, transfer funds, view imaged checks, reorder checks, conduct transfers between accounts and complete a mortgage application 24 hours per day, seven days per week through the bank's Internet site. Bill payment is offered for a fee. UMB also offers a telephone banking service that allows 24-hour access to accounts.
- Tax Freedom Program: Low- and moderate-income users of the bank's Internet site can prepare and file their tax returns at no cost.
- Bank by Mail: Allows customers to mail deposits, payments and messages to the bank.
- Government check cashing services: Customers can cash government checks, regardless of amount. Non-customers may cash government checks up to \$500 for a fee.
- BranchNet: Website development service offered to retail and commercial customers through UMBFC. This service assists customers in expanding their marketing efforts, including the design and maintenance of a website.

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

## **Community Development Services**

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

UMB bank staff provided their financial expertise to 34 different organizations that promote community development initiatives in the AA. Over half of the organizations provide community services to low- and moderate-income individuals such as youth and senior citizen programs, food pantries, job training, and health care. Other community development services provided by bank staff were to organizations that helped revitalize and stabilize low- and moderate-income geographies and provide affordable housing.

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

UMB has Interest on Lawyer Trust Accounts that attorneys use to deposit client funds. Service charges are netted against interest and the difference is paid to States and used to fund legal services for the indigent.

UMB bank staff work with Welfare to Work and Work Opportunity programs to assist low- and moderate-income individuals with finding employment.

Through the UMB CDC, employees work with nonprofit and government organizations to establish programs that serve low- and moderate-income borrowers.

UMB's Corporate Trust Division administers over \$67 million in funds used for affordable housing and revitalization efforts.

UMB's Investment Banking Division performs underwriting and finds investors for bond issuances that have a community development purpose. During the evaluation period, the division served as the financial advisor on seven different bond issuances with a community development purpose totaling over \$25 million. Additionally, UMB underwrote and along with its affiliate in Colorado, purchased seven bond issuances totaling \$6.5 million that benefited four of the bank's AAs.

## Multistate Metropolitan Area Rating

### St. Louis Multistate Metropolitan Area

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

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

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

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

The major factors that support this rating include:

- Lending test performance in the St. Louis MA is good as evidenced by a good level of lending activity, adequate overall geographic distribution, and good overall borrower income distribution. The level of community development lending is high and positively impacted the bank's lending performance.
- UMB demonstrated adequate responsiveness to community development needs in its AA. Current period investments total \$544 thousand in charitable contributions, the majority of which address revitalization activities in the city of St. Louis.
- Branch distribution is reasonably accessible to geographies and individuals of different income levels. Bank personnel provided a relatively high level of community development services during this evaluation period.

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

UMB operates 27 branch offices and 51 ATMs in the AA. The primary business focus in the St. Louis AA is home mortgage lending followed by consumer lending. The St. Louis MA represents 16 percent of the bank's deposit base and 26 percent of loan originations (including consumer loans). UMB ranks ninth in deposit market share among 90 financial institutions with a presence in the St. Louis MA. Bank deposits total \$743 million and represent 2 percent of area deposits. Strong competition for banking services exists in this market. Primary competitors include U.S. Bank, Bank of America, and Commerce Bank, which held deposit market shares of 23, 15, and 9 percent respectively.

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

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

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

## **LENDING TEST**

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

Our analysis in this area gave the most weight to home mortgage loans, followed by consumer and business loans. Home mortgage and business loans respectively account for 83 percent and 17 percent of the bank's reported loans (by number) over the evaluation period. Consumer loans represent 45 percent of the bank's loan volume (annualized by dollar) over the evaluation period. An analysis of UMB's small farm lending was not performed since this loan type represents less than one percent of it reported loans in the St. Louis MA. Small farm loans are not an identified credit need for this predominately metropolitan area.

### **Lending Activity**

Lending levels reflect good responsiveness in relation to area credit needs and the bank's deposit market share. UMB is a leader in home improvement lending. Of all HMDA data reported in the St. Louis MA for the year 2001, UMB ranked 1<sup>st</sup> in home improvement loans, 109<sup>th</sup> in home purchase loans (24<sup>th</sup> among local lenders) and 119<sup>th</sup> in refinance loans (25<sup>th</sup> among local lenders). Of all CRA data reported in the St. Louis MA for the year 2001, UMB ranked 30<sup>th</sup> in reported business loans (18<sup>th</sup> among the 27 local CRA-data reporting lenders).

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

The overall geographic distribution of loans is adequate.

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

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

The geographic distribution of reported home mortgage loans is good. Home improvement loans received the most weight in our analysis as they represent 86 percent of the bank's home mortgage lending, by number, in this area.

Performance in moderate-income areas is good. The distribution of home improvement loans in moderate-income tracts is somewhat lower than the demographic comparator, but the market share in moderate-income tracts substantially meets the bank's overall market share. In this MA for the year 2001, UMB ranked first in home improvement lending in moderate-income tracts. The bank reported 123 home improvement loans, more than twice the number of the next, closest-ranked local lender. Performance in other home mortgage products is poor.

Performance in low-income areas is good given the high percentage of families in these areas, 41 percent, below the poverty rate. The distribution of home improvement loans in low-income tracts is somewhat lower than the demographics, and market share is lower than the bank's overall market share. However, in this MA for the year 2001, the bank ranked second in overall market share, originating only one loan less than the top-rated, local lender. Performance in other home mortgage products is very poor.

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

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

Performance in both low- and moderate-income areas is good and near to the demographic comparator. Market share in low-income tracts substantially meets, and in moderate-income tracts is near to, the bank's overall market share of reported business loans.

### ***Consumer Loans***

Refer to Table 13 in the Multistate Metropolitan Areas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Performance in both low- and moderate-income tracts is very poor, even after considering households below poverty in these tracts. Loan distribution in both areas is significantly lower than the demographic comparator.

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

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



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

We performed an analysis of the inside/outside ratio at the bank level. A substantial majority of the loans were inside its AAs. Refer to the Scope of the Evaluation section for additional details.

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

The overall borrower distribution of loans is good.

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

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

The distribution of home mortgage loans to borrowers of different income levels is excellent. Performance with moderate-income borrowers is excellent. Moderate-income distributions consistently exceed the demographic comparator and the moderate-income market shares substantially meet or exceed the bank's overall market shares.

Performance with low-income borrowers is excellent given the family poverty rate of eight percent. Performance is particularly strong in the home improvement product where the low-income market share is near the overall product share. In this MA for the year 2001, the bank made the most home improvement loans to low-income borrowers. Performance with low-income borrowers in other home mortgage products is weak.

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

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

The distribution of loans to businesses of different sizes is adequate. The percentage of loans to small businesses (i.e. those with gross annual revenues of \$1 million or less) is lower than the demographic comparator; but the bank's market share of such loans exceeds its overall market share. Among local lenders for the year 2001, UMB ranked 18th in reported loans to small businesses in the area.

#### ***Consumer Loans***

Refer to Table 13 in the Multistate Metropolitan Areas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to borrowers of different income levels is good. Performance to moderate-income borrowers is excellent. The moderate-income distribution significantly exceeds the demographic comparator. Performance is not as strong to low-income borrowers, but is still reasonable given that 10 percent of the households in the AA are below poverty.

## **Community Development Lending**

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

Our analysis gave positive consideration to community development lending activities. The bank's responsiveness is excellent given its size, lending capacity and area opportunities. UMB originated 46 community development loans totaling \$61 million over the evaluation period, including:

- 29 loans totaling \$57 million that revitalize/stabilize low- and moderate-income areas;
- 10 loans totaling \$3.5 million for the acquisition, construction or rehabilitation of affordable housing for low- and moderate-income families;
- 4 loans totaling \$257 thousand to organizations that provide social services targeted to low- and moderate-income individuals; and,
- 3 loans totaling \$95 thousand that promote economic development.

## **Product Innovation and Flexibility**

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

## **INVESTMENT TEST**

The bank's performance under the Investment Test is rated "Low Satisfactory." Refer to Table 14 in the Multistate Metropolitan Areas section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

UMB demonstrated adequate responsiveness to community development needs in the St. Louis MA. During the evaluation period, the bank made 182 qualified charitable

contributions totaling \$544 thousand. The majority of these contributions benefit organizations involved in revitalization activities in low- and moderate-income areas within the city of St. Louis and directly address identified community development needs. The current period investments are generally responsive to community development needs, however, they are not complex and in some cases do not have a sizable impact in the market in relation to UMB's size and resources in the St. Louis MA. Community contacts and contextual research shows many opportunities exist in this AA. The St. Louis MA has a variety of community development needs including affordable housing, home improvement and repair for its aging housing stock, small business development, and revitalization of the downtown area which is comprised of numerous low- and moderate-income census tracts, and tracts with no income designation. While many opportunities do exist, there is strong competition from other financial institutions in the market. UMB has the ability to participate in community development activities in this AA.

Prior period investments include two bond issuances and the allocated portion of the UMB CDC. The purpose of the bonds was to upgrade the computer system of a community college in the AA, which primarily serves low- and moderate-income students. As of the examination date, the outstanding value of the bonds is \$1.5 million and the CDC is \$223 thousand. Refer to the UMB CDC description in the Kansas City AA for details. There has been no CDC activity in this AA during the evaluation period.

## **SERVICE TEST**

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

### **Retail Banking Services**

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

The percentage of branches in moderate-income tracts is significantly less than the percentage of population residing in those tracts. UMB does not have any branches in low-income tracts. However, 8 of the 25 branches in middle- or upper-income tracts are adjacent to low- or moderate-income tracts which helps provide reasonable access to residents in those areas.

During the evaluation period, UMB opened three and closed six branches. None of the new branches are in low- or moderate-income areas. One of the branch closings occurred in a moderate-income area. This branch, located in a grocery store, was closed as part of UMB's business decision not to renew leases of in-store branches due

to the loss of revenues. The closing did not adversely affect the accessibility of UMB's delivery systems to low- and moderate-income areas.

The percentage of ATMs in moderate-income tracts is less than the percentage of population in those tracts. UMB does not have any ATMs located in low-income areas. Of the 47 ATMs in middle- or upper-income tracts, 16 are adjacent to low- or moderate-income tracts which helps provide reasonable access to residents in those areas.

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

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

### **Community Development Services**

UMB provided a relatively high level of community development services in the St. Louis MA. UMB bank staff provided their financial expertise to 77 different organizations that promote community development initiatives in the AA. Over half of the organizations provide community services to low- and moderate-income individuals such as programs for youth, single parent families, senior citizens, and the disabled. Financial education training targeted to low- and moderate-income individuals is also provided. Other community development services provided by bank staff were to organizations that helped revitalize and stabilize low- and moderate-income geographies and provide affordable housing.

UMB's Corporate Trust Division administers over \$1.4 billion in funds used for affordable housing. This Division also administers another \$318 million in funds that help revitalize and stabilize low- and moderate-income geographies.

UMB provides public fund and cash management services to 20 organizations that primarily serve low- and moderate-income individuals and help revitalize and stabilize low- and moderate-income geographies. Cash management services include depository relationships, investment guidance, and funds management of general revenues or revenues derived from bond issues. These services are provided at either reduced or waived fees.

Refer to the Service Test comment for the Kansas City AA for details on community development services offered by UMB via Electronic Transfer Accounts, Temporary Aid to Needy Families, and Interest on Lawyer Trust Accounts. Comments related to employee participation with Welfare to Work and Work Opportunity programs and the UMB CDC also apply to the St. Louis AA.

## State Rating

### State of Missouri

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

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

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

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

The major factors that support this rating include:

- Based on a full-scope review, lending test performance is adequate in the Joplin MA. This area represents 14 percent of bank deposits in the State of Missouri. Lending performance in the limited-scope AAs is not inconsistent with performance in Joplin MA. The limited-scope AAs collectively account for 86 percent of bank deposits in the State of Missouri.
- UMB provided a good level of community development investments in the Joplin MA. Qualified investments addressed the need of affordable housing for low-income seniors. Investment performance in the Springfield and St. Joseph MAs, and the combined non-metropolitan AAs is not inconsistent with performance in the Joplin MA.
- Branch distribution is accessible to geographies and individuals of different income levels. Bank personnel provided an adequate level of community development services during this evaluation period.

### Description of Institution's Operations in Missouri

UMB operates 38 branches and 42 ATMs within ten AAs in the state of Missouri. The Missouri AAs include four metropolitan areas: Joplin, Columbia, Springfield, and St. Joseph; and six non-metropolitan areas Central Missouri, Northeast Missouri, North Central Missouri, Northwest Missouri, Jefferson City, and Monett. Fourteen percent of the bank's total deposits and 33 percent of loan originations, by number, are attributed to the AAs in the state of Missouri. Consumer loans are the primary credit product, representing 63 percent by number and 39 percent by dollar volume, of all loan originations in the state.

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

UMB ranks seventh in deposit market share among all financial institutions operating in its Missouri AAs. Deposits in the state total \$659 million and represent four percent of the market. Major competitors are U.S. Bank, Commerce Bank, and the Great Southern Bank with 9, 8, and 5 percent of the market respectively.

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

## **Scope of Evaluation in Missouri**

We evaluated the bank's performance in the state of Missouri by performing a full-scope review in the Joplin MA and limited-scope reviews in the Columbia, Springfield, and St. Joseph MAs and the combined non-metropolitan areas. The state rating is primarily based on the performance in the Joplin MA. The Joplin MA represents fourteen percent of deposits and 13 percent of loan originations in the state. The Joplin MA also has one of the highest percentages of the bank's total deposits at two percent and the most loan originations at four percent compared to all other AAs in the state. UMB operates five branch offices and six ATMs in the AA. The primary business focus in the Joplin MA is business and consumer lending. UMB ranks ninth in deposit market share among 15 financial institutions with a presence in the Joplin MA. Bank deposits total \$93 million and represent 5 percent of area deposits.

We conducted one community contact in the Joplin MA with a local not-for-profit entity who identified small business lending for start-up companies and affordable housing as the primary credit needs of this area.

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

## **LENDING TEST**

Our analysis in the Joplin MA gave the most weight to consumer loans, followed by business, home mortgage and farm loans. Consumer loans represent 52 percent of the bank's loan volume (annualized by dollar) over the evaluation period. Business, home mortgage and farm loans respectively account for 42, 30, and 28 percent of the bank's reported loans (by number) over the evaluation period.

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

The bank's performance under the lending test in Missouri is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Joplin MA is adequate.

## **Lending Activity**

Lending levels reflect adequate responsiveness in relation to area credit needs and the bank's deposit market share. Refer to Table 1 Lending Volume and Table 1a Other Products, in the state of Missouri section of appendix D for the facts and data used to evaluate the bank's lending activity.

Of all HMDA data reported in the Joplin MA for the year 2001, UMB ranked 7<sup>th</sup> in home improvement loans (same among local lenders), 38<sup>th</sup> in home purchase loans (12<sup>th</sup> among local lenders) and 34<sup>th</sup> in refinance loans (12<sup>th</sup> among local lenders). Of all CRA data reported in the Joplin MA for the year 2001, UMB ranked 13<sup>th</sup> in reported business loans (6<sup>th</sup> among the 7 local CRA-data reporting lenders).

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

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

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

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

The geographic distribution of reported home mortgage loans is excellent. Refinance and home improvement loans received the most weight in our analysis, followed by home purchase loans. These loans respectively represent 38, 37, and 25 percent of the bank's home mortgage lending, by number, in this area.

Performance in moderate-income areas is excellent. The distribution of loans in moderate-income tracts exceeds the demographic comparator for home improvement and refinance loans. The distribution is near to the demographic for home purchase loans. Market share in moderate-income tracts consistently exceed the overall market share for all home mortgage products.

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

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

Performance in moderate-income areas is adequate. The moderate-income tract distribution is lower than the demographic comparator, and the market share exceeds the bank's overall market share. In this MA for the year 2001, the bank ranked sixth in business loans reported by local lenders.

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

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

Performance in moderate-income areas is adequate given the limited farm lending opportunities. Moderate-income tracts in this MA contain just 17 farms. Peer data for the year 2001 reflects just one farm loan in the area's moderate-income tracts.

### ***Consumer Loans***

Refer to Table 13 in the state of Missouri section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Performance in moderate-income areas is poor, even after considering the level of households below poverty in these tracts. The distribution of loans in moderate-income tracts is lower than the demographic comparator.

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

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

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

We performed an analysis of the inside/outside ratio at the bank level. A substantial majority of the loans were inside its AAs. Refer to the Scope of the Evaluation section for additional details.

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

The overall borrower distribution of loans is good.

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

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

The distribution of home mortgage loans to borrowers of different income levels is excellent. Performance with moderate-income borrowers is excellent. The moderate-income distribution exceeds the demographic comparator for refinance and home improvement loans, and is near to the demographic comparator for home purchase loans. The moderate-income market share exceeds the bank's overall market share for



refinance and home improvement loans, and is near to the bank's overall market share for home purchase loans.

Performance with low-income borrowers is excellent. The distribution of loans to low-income borrowers is strong considering the family poverty rate of 11 percent in the AA. The low-income market share exceeds the bank's overall market share for refinance and home improvement loans, but is lower than the bank's overall market share for home purchase loans.

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

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

The distribution of loans to businesses of different sizes is excellent. The percentage of loans to small businesses (i.e. those with gross annual revenues of \$1 million or less) exceeds the demographic comparator. The bank's market share of such loans exceeds its overall market share.

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

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

The distribution of loans to farms of different sizes is good. The percentage of loans to small farms (i.e. those with gross annual revenues of \$1 million or less) substantially meets the demographic comparator. The bank's market share of such loans also substantially meets its overall product share.

### ***Consumer Loans***

Refer to Table 13 in the state of Missouri section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to borrowers of different income levels is good. The distribution of loans to moderate-income borrowers exceeds the demographic comparator. Performance is similarly strong to low-income borrowers considering the percentage of households poverty rate of 16 percent.

## Community Development Lending

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

Our analysis gave neutral consideration to community development lending activities. UMB originated two-community development loans totaling \$78 thousand in the Joplin MA. The loans facilitated affordable housing for low- and moderate-income individuals.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Columbia and Springfield MAs and in the combined non-metropolitan areas is not inconsistent with the bank's overall "Low Satisfactory" performance under the lending test in Missouri. In the St. Joseph MA, the bank's performance is stronger than the bank's overall performance in the state due to excellent geographic distribution for home mortgage and business loans. This performance difference did not impact the lending test rating. Refer to the Tables 1 through 13 in the state of Missouri section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Missouri is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Joplin MA is good. Refer to Table 14 in the state of Missouri section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, the bank underwrote and purchased a \$1.5 million industrial revenue bond for improvements to a residential facility for the elderly who are predominately low-income. This investment is responsive to housing needs for low- and moderate-income individuals, an identified community need. UMB also made seven charitable donations totaling \$11 thousand to qualified organizations that address community development needs. Prior period investments represent the allocated portion of the UMB CDC totaling \$61 thousand. Refer to the UMB CDC description in the Kansas City AA for details. There has been no CDC activity in this AA during the evaluation period.

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

Based on limited-scope reviews, the bank's performance under the investment test in the Springfield and St. Joseph MAs, and in the combined non-metropolitan AAs is not inconsistent with the bank's overall "High Satisfactory" performance under the investment test in Missouri. The UMB CDC originated three loans to borrowers in the Springfield AA during the evaluation period totaling \$179 thousand. In the Columbia MA, the bank's performance is weaker than the bank's overall performance in the state due to the limited number and nominal amount of investments in the AA. Performance in the Columbia MA had no impact on the overall rating for the state. Refer to the Table 14 in the state of Missouri section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Missouri is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Joplin MA is good. Refer to Table 15 in the state of Missouri section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

### **Retail Banking Services**

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

Based on percentages, the number of branches and ATMs in moderate-income tracts exceeds the percentage of population residing in those tracts. In addition, three of the four branches and two of the five ATMs in middle- or upper-income tracts are adjacent to moderate-income tracts. The Joplin AA does not have any low-income geographies. UMB has not opened or closed any branches in the AA during the evaluation period.

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

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

## **Community Development Services**

UMB provided an adequate level of community development services in the Joplin AA. UMB bank staff provided their financial expertise to six different organizations that promote community development initiatives in the AA. The organizations provide community services targeted to low- and moderate-income individuals.

Refer to the Service Test comment for the Kansas City AA for details on community development services offered by UMB via Electronic Transfer Accounts, Temporary Aid to Needy Families, and Interest on Lawyer Trust Accounts. Comments related to employee participation with Welfare to Work and Work Opportunity programs and the UMB CDC also apply to the Joplin AA.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Columbia and St. Joseph MAs is not inconsistent with the bank's overall "High Satisfactory" performance under the service test in Missouri. In the Springfield MA and the combined non-metropolitan areas, the bank's performance is weaker than the bank's overall performance in the state. Performance is considered weaker because there are no branches in the low- and moderate-income tracts of these AAs. In the Springfield MA, 24 percent of the population resides in low- and moderate-income geographies. The bank's performance in the combined non-metropolitan areas was given minimal weight because only 4 percent of the population resides in low- and moderate-income tracts. Weaker performance did not detract from the bank's overall performance in the state. Refer to Table 15 in the state of Missouri section of appendix D for the facts and data that support these conclusions.

## State Rating

### State of Kansas

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

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

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

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

The major factors that support this rating include:

- Based on a full-scope review, lending test performance is adequate in the Topeka MA. This area represents 56 percent of the bank's deposits in the State of Kansas. Lending performance is significantly stronger in the combined non-metropolitan areas, which positively impacted the lending test rating. The combined non-metropolitan areas represent 34 percent of the statewide deposits.
- Investment test performance in the Topeka MA is poor. However, UMB and its affiliate in Colorado demonstrated good responsiveness to community development needs in the combined non-metropolitan areas with the purchase of \$3.5 million in industrial revenue bonds. These bonds promote economic development through financing the expansion of a small business that resulted in permanent job creation for low- and moderate-income individuals. This investment activity positively impacted the investment test rating.
- Branch distribution is readily accessible to geographies and individuals of different income levels in the Topeka MA. However, branch distribution in the Lawrence MA and the combined non-metropolitan areas is weaker than the bank's performance in Topeka, which negatively impacted the service test rating. Bank personnel provided a limited level of community development services in the Topeka AA.

### Description of Institution's Operations in Kansas

UMB operates 10 branches and 10 ATMs within 5 AAs in the state of Kansas. The Kansas AAs include 3 metropolitan areas: Topeka, Lawrence, and Wichita; and two non-metropolitan areas: Atchison and Fort Scott. By number, 4 percent of the bank's total deposits and 7 percent of loan originations are attributed to the AAs in the state of Kansas. Consumer loans are the primary credit product, representing 65 percent by

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

number and 34 percent by dollar volume, of all loan originations in the state. However, business loans represent the largest dollar volume of originations at 48 percent.

UMB ranks 12<sup>th</sup> in deposit market share among all financial institutions operating in the Kansas AAs. Deposits in the state total \$198 million and represent approximately two percent of the market. Market share leaders include Capitol Federal Savings, Intrust Bank, and Bank of America with 20, 14, and 9 percent of the market respectively.

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

## **Scope of Evaluation in Kansas**

We evaluated the bank's performance in the state of Kansas by performing a full-scope review in the Topeka MA and limited-scope reviews in the Lawrence and Wichita MAs and the combined non-metropolitan areas. The state rating is primarily based on the performance in the Topeka MA, however, since the limited-scope AAs represented a substantial portion of the bank's lending and investment activities, the performance in these AAs impacted the final rating assigned to the state of Kansas.

The Topeka MA represents 56 percent of deposits and 24 percent of loan originations in the state. The Topeka MA also has the highest percentages of the bank's total deposits and loan originations, both at two percent, of any other AA in the state. UMB operates four branch offices and four ATMs in the AA. The primary business focus in the Topeka MA is consumer lending. UMB ranks eighth in deposit market share among 18 financial institutions with a presence in the Topeka MA. Bank deposits total \$110 million and represents three percent of area deposits.

We conducted one community contact in the Topeka MA with an economic development specialist for the City of Topeka. Our contact identified small business lending and capital for start-up companies as a primary credit need in this area.

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

## **LENDING TEST**

Our analysis in the Topeka MA gave the most weight to consumer loans, followed by business and home mortgage loans. Consumer loans represent 54 percent of the bank's loan volume (annualized by dollar) over the evaluation period. Business and home mortgage loans respectively account for 62 percent and 37 percent of the bank's reported loans (by number) over the evaluation period.

Our analysis of business loans gave more consideration to bank loan distributions than to market share analysis. Just six banks in the Topeka MA (representing 33 percent of area deposits) reported CRA data in 2001. An evaluation of UMB's small farm lending was not performed since this loan type represents only 1 percent of its reported loans in

the Topeka MA. Small farm loans are not an identified credit need for this predominately metropolitan area.

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

The bank's performance under the lending test in Kansas is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Topeka MA is adequate. Performance in the non-metropolitan is stronger than the bank's performance in the Topeka MA and positively impacted the lending test rating.

## **Lending Activity**

Lending levels reflect adequate responsiveness in relation to area credit needs and the bank's deposit market share. Refer to Table 1 Lending Volume and Table 1a Other Products, in the state of Kansas section of appendix D for the facts and data used to evaluate the bank's lending activity.

Of all HMDA data reported in the Topeka MA for the year 2001, UMB ranked 15<sup>th</sup> in home improvement loans (tenth among local lenders) and 82<sup>nd</sup> in refinance loans (12<sup>th</sup> among local lenders). Of all CRA data reported in the Topeka MA for the year 2001, UMB ranked 16<sup>th</sup> in reported business loans (5<sup>th</sup> among the 6 local CRA-data reporting lenders).

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

The overall geographic distribution of loans is adequate.

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

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

The geographic distribution of reported home mortgage loans is adequate. Our analysis only considered home improvement loans, as there are insufficient home purchase and home refinance loans for meaningful analysis.

Performance in moderate-income areas is good. The distribution of loans in moderate-income tracts for home improvement loans substantially meets the demographic comparator, and the market share in moderate-income tracts exceeds the bank's overall market share. In this MA for the year 2001, the bank ranked sixth in home improvement lending by local lenders in the moderate-income tracts.

Performance in low-income areas is adequate given the limited opportunities for home mortgage lending. Low-income tracts contain 724 owner-occupied housing units, but the family poverty level in low-income tracts is high at 37 percent. In aggregate, lenders reported just 17 home improvement loans, 22 refinance loans and 23 home purchase

loans in the area's low-income tracts for the year 2001; most lenders reported no more than one loan of each type. UMB originated one refinance loan and one home purchase loan in the area's low-income tracts over the evaluation period.

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

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

The geographic distribution of small loans to businesses is excellent. This analysis emphasizes moderate-income tract performance. Moderate-income tracts contain more than twice the number of businesses than low-income tracts.

Performance in moderate-income areas is excellent. Distribution in the moderate-income tracts exceeds the demographic comparator; and the market share in moderate-income tracts exceeds the bank's overall share of reported business loans.

Performance in low-income areas is good. The low-income tract distribution is near to the demographic comparator. The low-income tract market share is somewhat lower than the bank's overall market share of business loans, but market share data has limited meaning in this area.

### ***Consumer Loans***

Refer to Table 13 in the state of Kansas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans is poor. Performance in moderate-income areas is adequate considering the household poverty level of five percent in the AA. Performance in low-income areas is very poor. The distribution is significantly lower than the demographic comparator, even with consideration to the level of households below poverty in the low-income tracts.

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

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

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

We performed an analysis of the inside/outside ratio at the bank level. A substantial majority of the loans were inside its AAs. Refer to the Scope of the Evaluation section for additional details.



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

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

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

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

The distribution of home mortgage loans to borrowers of different income levels is excellent. Performance with moderate-income borrowers is excellent for home improvement loans and exceeds the demographic comparator. Moderate-income market share meets the bank's overall market share.

Performance with low-income borrowers is excellent. The low-income distribution for home improvement loans is excellent considering a seven percent poverty rate among families in the AA. The low-income market share exceeds the bank's overall market share.

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

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

The distribution of loans to businesses of different sizes is adequate. The percentage of loans to small businesses (i.e. those with gross annual revenues of \$1 million or less) is near to the demographic comparator. The bank's market share of such loans exceeds its overall market share for small business loans; however, market data has limited meaning in this area.

### ***Consumer Loans***

Refer to Table 13 in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to borrowers of different income levels is excellent. The moderate-income distribution significantly exceeds the demographic comparator. Performance is similarly strong to low-income borrowers when consideration is given to the 10 percent poverty rate for households in this AA.

## Community Development Lending

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

Our analysis gave neutral consideration to community development lending activities. UMB originated two community development loans totaling \$21 thousand in the Topeka MA. The loans were to organizations that provide social services for low- and moderate-income individuals.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the combined non-metropolitan areas is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test in Kansas. Performance in the non-metropolitan areas was stronger and positively impacted the lending test rating. Stronger performance is evidenced by excellent geographic distribution across all product lines and excellent borrower distribution for business and consumer loans. Performance in the Lawrence and Wichita MA is weaker than the bank's overall performance in the state due to weak borrower distribution for business and consumer loans. This performance did not impact the overall lending test rating for the state. Refer to the Tables 1 through 13 in the state of Kansas section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Kansas is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Topeka MA is poor. However, performance in the combined non-metropolitan areas is stronger than the bank's performance in the Topeka MA and positively impacted the investment test rating. Refer to Table 14 in the state of Kansas section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Current period investments total \$16 thousand and consist of charitable contributions to qualified agencies to meet community development needs. Community contacts and contextual research identified many opportunities exist in this AA. Community development needs include affordable housing and small business development. UMB has the ability to participate in these investment opportunities. The prior period investment represents the allocated portion of the UMB CDC totaling \$73 thousand.

Refer to the UMB CDC description in the Kansas City AA for details. The CDC was not active in this AA during the evaluation period.

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

Based on limited-scope reviews, the bank's performance under the investment test in the combined non-metropolitan areas is not inconsistent with the bank's overall "Low Satisfactory" performance under the investment test in Kansas. Performance in the combined non-metropolitan area is stronger and had a positive impact on the investment test rating. UMB underwrote and purchased an industrial revenue bond, totaling \$1.5 million, for business expansion in the city of Atchison. The bank's affiliate in Colorado also purchased one of these bonds for \$2 million. The investment promotes economic development by financing the expansion of a small business located in a state designated enterprise zone that resulted in the permanent creation of over 100 jobs for low- and moderate-income people. In the Lawrence and Wichita MAs, the bank's performance is weaker than the bank's overall performance in the state due to the limited number and amount of investments made in the AA. Performance in these AAs did not adversely impact the overall rating for the state of Kansas. Refer to the Table 14 in the state of Kansas section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Kansas is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Topeka MA is excellent. Performance in the Lawrence MA and the combined non-metropolitan area is weaker than the bank's overall performance and negatively impacted the service test rating. Refer to Table 15 in the state of Kansas section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

### **Retail Banking Services**

Refer to Table 15 in the state of Kansas section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

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

Based on percentages, the number of branches and ATMs in moderate-income tracts exceeds the percentage of population residing in those tracts. There are no branches or ATMs in low-income tracts. However, only 3 percent of the population resides in

these geographies. UMB has not opened or closed any branches in the Topeka AA during the evaluation period.

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

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

### **Community Development Services**

UMB provided a limited level of community development services in the Topeka AA. UMB bank staff provided their financial expertise to two different organizations that promote community development initiatives in the AA. One organization provides community services targeted to low- and moderate-income individuals. The other organization helps revitalize and stabilize low- and moderate-income geographies.

Refer to the Service Test comment for the Kansas City AA for detail on community development services offered by UMB via Electronic Transfer Accounts, Temporary Aid to Needy Families, and Interest on Lawyer Trust Accounts. Comments related to employee participation with Welfare to Work and Work Opportunity programs and the UMB CDC also apply to the Topeka AA.

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

Based on limited-scope reviews, the bank's performance under the service test in the Wichita MA is not inconsistent with the bank's overall "High Satisfactory" performance under the service test in Kansas. In the Lawrence MA and the combined non-metropolitan areas, the bank's performance is weaker than the bank's overall performance in the state. Performance is weaker because there are no branches in low- or moderate-income tracts. In the Lawrence AA, 23 percent of the population resides in low- and moderate-income geographies and in the combined non-metropolitan areas 18 percent of the population reside in moderate-income tracts. This performance negatively impacted the overall rating for the state. Refer to Table 15 in the state of Kansas section of appendix D for the facts and data that support these conclusions.

## State Rating

### State of Illinois

#### CRA Rating for Illinois<sup>5</sup>: Needs to Improve

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

The investment test is rated: **Needs to Improve**

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

The major factors that support this rating include:

- Lending test performance is adequate in the Morrisonville AA based on a full-scope review. This area represents 100 percent of UMB deposits in the state of Illinois.
- The bank did not make any significant qualified investments in the AA during the evaluation period.
- Branch distribution is reasonably accessible to geographies and individuals of different income levels. Bank personnel provided few community development services in the Morrisonville AA.

### Description of Institution's Operations in Illinois

UMB operates one branch and no ATMS in its AA in Illinois. The Illinois AA is made up of a two county area in central Illinois. Less than one-half of one percent of the bank's total deposits and total loans are attributed to this AA. Consumer loans are the primary credit product, representing 55 percent by number and 59 percent by dollar volume, of all loan originations in the state.

UMB ranks 19<sup>th</sup> in deposit market share among all financial institutions operating in its Illinois AA. Deposits in the state total \$21 million and represent approximately two percent of the market. Core deposits, however are just \$8 million. Market share leaders include Bank & Trust, First National Bank in Taylorville, and U.S. Bank with 9, 8, and 8 percent of the market respectively.

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

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

## **Scope of Evaluation in Illinois**

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

We conducted one community contact in the Morrisonville AA with a member of a local county board. Our contact identified home purchase and repair, small business, and agriculture lending, as primary credit needs.

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

## **LENDING TEST**

Our analysis in the Morrisonville AA gave the most weight to consumer loans, followed by business loans. Consumer loans represent 68 percent of the bank's loan volume (annualized by dollar) over the evaluation period. Business loans represent 72 percent of the bank's reported loans, by number, over the evaluation period. We did not perform an evaluation of UMB's home mortgage or small farm lending since the number of loans originated are not sufficient for a meaningful analysis.

We did not consider market share data in our analysis of the Morrisonville AA. Only 6 of 26 local banks (representing 27 percent of area deposits) report HMDA data, and just 5 banks (representing 18 percent of area deposits) report CRA data.

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

The bank's performance under the lending test in Illinois is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Morrisonville AA is adequate.

## **Lending Activity**

Refer to Table 1 Lending Volume and Table 1a Other Products, in the state of Illinois section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect adequate responsiveness in relation to area credit needs and the bank's deposit market share. Over the evaluation period, UMB originated \$734 thousand reportable business, home mortgage and farm loans, and \$1 million consumer loans in the Morrisonville AA.

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

The overall geographic distribution of loans is poor based on performance in moderate-income tracts. There are no low-income tracts in the Morrisonville AA.

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

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

Performance in moderate-income areas is adequate despite the lack of business loans in any of the moderate-income tracts. The AA contains only two moderate-income tracts. Business demographics show only 267 businesses in the moderate-income tracts and the bank is in poor proximity to both of these tracts.

### ***Consumer Loans***

Table 13 in the state of Illinois section of appendix D presents the data collected by the bank for consumer loan originations and purchases. However, our conclusions are based on a separate analysis for consumer loans that is not reflected in the data presented in the tables. Our analysis is based only on motor vehicle loan distributions, as there were insufficient loans in other products for meaningful analysis. Our analysis also emphasizes the performance of indirect loans purchased through automobile dealers as they account for 54 percent of the bank's motor vehicle loans in this AA and there are significant performance differences between originated and purchased loans.

Performance in moderate-income areas is poor. Performance for purchased motor vehicle loans is very poor. The bank did not purchase any motor vehicle loans in moderate-income tracts over the evaluation period, even though one of the indirect dealers utilized by the bank has a good proximity to a moderate-income tract that contains approximately half the area's moderate-income households.

Performance for motor vehicle loan originations is strong despite the bank's poor proximity to the moderate-income tracts. The distribution exceeds the demographic comparator.

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

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

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

We performed an analysis of the inside/outside ratio the bank level. A substantial majority of the loans were inside its AAs. Refer to the Scope of the Evaluation section for additional details.

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

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

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

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

The distribution of loans to businesses of different sizes is excellent. The percentage of loans to small businesses (i.e. those with gross annual revenues of \$1 million or less) exceeds the demographic comparator.

### ***Consumer Loans***

Refer to Table 13 in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to borrowers of different income levels is adequate. Performance with moderate-income borrowers is excellent. The moderate-income distribution significantly exceeds the demographic comparator. Performance with low-income borrowers is very poor. The low-income distribution is significantly less than the demographic comparator even after considering the percentage of households below poverty.

### **Community Development Lending**

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

The bank did not originate any community development loans in this AA during the evaluation period. The absence of community development lending had a neutral impact on our assessment.



## **INVESTMENT TEST**

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

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

UMB did not make any significant qualified investments in the Morrisonville AA during the evaluation period. The bank made four charitable contributions totaling \$486 in the current period. The prior period investment represents the allocated portion of the UMB CDC. There has been no CDC activity in this AA during the evaluation period. Refer to the UMB CDC description in the Kansas City AA for details. Although opportunities to participate in community development activities are somewhat limited, community contacts and contextual research identified qualified social service agencies located in the bank's AA that provide needed community services to low- and moderate-income individuals. Further, UMB is of the size and has the capacity to develop, community development opportunities within its AA.

## **SERVICE TEST**

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

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

### **Retail Banking Services**

UMB's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the Morrisonville AA. The bank provides few community development services.

UMB operates one branch in the Morrisonville AA. The branch is located in a middle-income tract adjacent to a moderate-income tract. There are no ATMs in the AA. There are no low-income tracts in the AA and nine percent of the population resides in 2 moderate-income tracts, located 15 miles north and 23 miles east of the bank's location.

Banking hours do not vary in a way that inconveniences the AA. The branch lobby opens at 8:30 a.m. Monday through Saturday. Monday through Thursday, the lobby closes at 3:00 p.m. On Friday and Saturday, the lobby remains open until 6:00 p.m.

and noon, respectively. Drive-up facilities open at 8:00 a.m. and offer extended hours until 4:30 p.m., Monday through Thursday. Refer to the Service Test comment for the Kansas City AA for details on other alternative delivery systems offered by UMB.

### **Community Development Services**

UMB provided a limited level of community development services in the Morrisonville AA. Refer to the Service Test comment for the Kansas City AA for detail on community development services offered by UMB via Electronic Transfer Accounts, Temporary Aid to Needy Families, and Interest on Lawyer Trust Accounts. Comments related to employee participation with Welfare to Work and Work Opportunity programs and the UMB CDC also apply to the Morrisonville AA. No other community development services are provided.

## State Rating

### State of Oklahoma

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

The lending test is rated: High Satisfactory

The investment test is rated: Needs to Improve

The service test is rated: Low Satisfactory

The major factors that support this rating include:

- Based on a full-scope review, lending test performance is good in the Oklahoma City MA. This area represents 100 percent of UMB deposits in the state of Oklahoma.
- Performance under the investment test is poor. UMB made charitable contributions totaling \$23 thousand to agencies that provide community services to low- and moderate-income individuals. These contributions did not result in a significant impact to the identified needs of the AA.
- Branch distribution is reasonably accessible to geographies and individuals of different income levels. Bank personnel provided few community development services in the Oklahoma City MA.

### Description of Institution's Operations in Oklahoma

UMB operates seven branches and three ATMs within two AAs in the state of Oklahoma. The Oklahoma AAs include two metropolitan areas: Oklahoma City and Tulsa. We did not include performance in the Tulsa MA as it represents a new market for the bank and has been in operation less than one year. Three percent of all bank deposits and four percent of loan originations, by number, are attributed to the Oklahoma City MA. Business and consumer loans are the primary credit products in this AA. Business loans account for 44 percent by number, and 70 percent by dollar volume, of all loan originations in the state. Consumer loans represent 49 percent by number and 22 percent by dollar volume.

UMB ranks 16<sup>th</sup> in deposit market share among all financial institutions operating in its Oklahoma City AA. Deposits in the AA total \$144 million and represent approximately 2 percent of the market. Market share leaders include Bank One Oklahoma, MidFirst Bank, and Bank of Oklahoma with 15, 13, and 11 percent of the market respectively.

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

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

## **Scope of Evaluation in Oklahoma**

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

We conducted one community contact in the Oklahoma City MA with a representative of a local economic development council. Primary credit needs identified by this contact includes small business financing and affordable housing.

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

## **LENDING TEST**

Our analysis in the Oklahoma City MA gave the most weight to business, followed by consumer loans. Business loans represent 86 percent of the bank's reported loans, by number over the evaluation period. Consumer loans represent 23 percent of the bank's loan volume (annualized by dollar) over the evaluation period. We did not perform an analysis of UMB's home mortgage or small farm lending. The number of home mortgage loan originations is not sufficient to perform a meaningful analysis and small farm loans represent only one percent of it reported loans in the Oklahoma City MA. Small farm loans are not an identified credit need for this predominately metropolitan area.

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

The bank's performance under the lending test in Oklahoma is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Oklahoma City MA is good.

## **Lending Activity**

Lending levels reflect good responsiveness in relation to area credit needs and the bank's deposit market share. Refer to Table 1 Lending Volume and Table 1a Other Products, in the state of Oklahoma section of appendix D for the facts and data used to evaluate the bank's lending activity.

Of all CRA data reported in the Oklahoma City MA for the year 2001, UMB ranked 19<sup>th</sup> in reported business loans (10<sup>th</sup> among the 17 local CRA-data reporting lenders).

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

The overall geographic distribution of loans is excellent.

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

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

Performance in both low- and moderate-income areas is excellent and exceeds the demographic comparator. The market share in these tracts exceeds the bank's overall market share of small business loans.

### ***Consumer Loans***

Table 13 in the state of Oklahoma section of appendix D presents the data collected by the bank for consumer loan originations and purchases. However, our conclusions are based on a separate analysis for consumer loans that is not reflected in the data presented in the tables. Our analysis gave more weight to loans purchased through indirect dealers as they account for 54 percent of all consumer loans in this AA. Additionally, performance in the moderate-income tracts is emphasized as they contain more than seven-times the number of households in low-income tracts.

The geographic distribution of consumer loans is adequate. Performance in moderate-income areas is adequate. Moderate-income tract performance for originated consumer loans is good; the distribution meets the demographic comparator. Moderate-income tract performance for purchased consumer loans is adequate as most indirect dealers utilized by the bank have poor proximity to moderate-income tracts.

Performance in low-income areas is good. Low-income tract performance for originated consumer loans is excellent; the distribution significantly exceeds the demographic comparator. Low-income tract performance for purchased consumer loans is adequate as the indirect dealers utilized by the bank have poor proximity to low-income tracts.

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

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

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

We performed an analysis of the inside/outside ratio at the bank level. A substantial majority of the loans were inside its AAs. Refer to the Scope of the Evaluation section for additional details.

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

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

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

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

The distribution of loans to businesses of different sizes is adequate. The percentage of loans to small businesses (i.e. those with gross annual revenues of \$1 million or less) is below the demographic comparator. In this MA for the year 2001, the bank ranked 10th in loans to small businesses reported by local lenders.

### ***Consumer Loans***

Refer to Table 13 in the state of Oklahoma section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to borrowers of different income levels is adequate. Performance with moderate-income borrowers is good. The moderate-income distribution exceeds the demographic comparator. Performance with low-income borrowers is adequate given a household poverty rate of 14 percent.

## **Community Development Lending**

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

Our analysis gave positive consideration to community development lending activities. UMB originated six community development loans totaling \$1 million in the Oklahoma City MA including:

- 4 loans totaling \$875 thousand that revitalize/stabilize low- and moderate-income areas; and,
- 2 loans totaling \$78 thousand that promote economic development.

## **INVESTMENT TEST**

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

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

Current period activity in the Oklahoma City MA consists of charitable contributions totaling \$23 thousand. The number and dollar amount of contributions is low and does not have a significant impact in meeting identified community development needs in the AA. The prior period investment represents the allocated portion of the UMB CDC, which was not active in Oklahoma during the evaluation period. Refer to the UMB CDC description in the Kansas City AA for details. Community contacts and contextual research identified numerous community development opportunities in Oklahoma City MA. Community development needs include affordable housing and small business development. UMB has the capacity to participate in these activities.

## **SERVICE TEST**

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

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

### **Retail Banking Services**

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

Based on percentages, the number of branches and ATMs in low-income tracts exceeds the percentage of population residing in those tracts. There are no branches or ATMs in the moderate-income tracts where 26 percent of the population resides. However, three of the six branches in middle- or upper-income tracts are adjacent to moderate-income tracts. In addition, there are two branches in tracts with no income level designation adjacent to low- and moderate-income tracts. These branches help provide reasonable access to residents in these geographies.

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

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

### **Community Development Services**

UMB provided few community development services in the Oklahoma City AA. UMB bank staff provided their financial expertise to one organization that provides community services targeted to low- and moderate-income individuals.

Refer to the Service Test comment for the Kansas City AA for detail on community development services offered by UMB via Electronic Transfer Accounts, Temporary Aid to Needy Families, and Interest on Lawyer Trust Accounts. Comments related to employee participation with Welfare to Work and Work Opportunity and the UMB CDC also apply to the Oklahoma City AA.



## 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”).

<b>Time Period Reviewed</b>	Lending Test (includes CD loans): 01/01/00 to 12/31/02 Investment and Service Tests: 05/23/00 to 07/03/03	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
UMB Bank, n.a. (UMB) Kansas City, Missouri	Home Mortgage, Small Business, Small Farm, and Community Development Loan Data; Consumer Loans; Qualified Investments; Retail and Community Development Services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
UMB CDC UMB Capital Corporation UMB Bank Colorado, N.A.	Subsidiary of UMBFC Subsidiary of UMB Subsidiary of UMBFC	Qualified Investments Qualified Investments Qualified Investments
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Multistate MAs: Kansas City MA #3760 St. Louis MA #7040  State of Missouri: Joplin MA #3710 Columbia MA #1740 Springfield MA #7920 St. Joseph MA #7000 Combined Non-MA AAs  State of Kansas: Topeka MA #8440 Lawrence MA #4150 Wichita MA #9040 Combined Non-MA AAs  State of Illinois: Morrisonville AA  State of Oklahoma Oklahoma City MA #5880	Full-scope Full-scope  Full-scope Limited-scope Limited-scope Limited-scope Limited-scope  Full-scope Limited-scope Limited-scope Limited-scope  Full-scope  Full-scope	Central Missouri; Northeast Missouri; North Central Missouri; Northwest Missouri; Jefferson City; Monett  Atchison; Ft. Scott

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

RATINGS: UMB Bank, n.a.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
UMB Bank, n.a.	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Kansas City MA	Outstanding	High Satisfactory	Low Satisfactory	Satisfactory
St. Louis MA	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of Missouri	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of Kansas	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
State of Illinois	Low Satisfactory	Needs to Improve	Low Satisfactory	Needs to Improve
State of Oklahoma	High Satisfactory	Needs to Improve	Low Satisfactory	Satisfactory

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

# Appendix C: Market Profiles for Full-Scope Areas

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

KANSAS CITY MULTISTATE METROPOLITAN AREA .....	C-2
ST. LOUIS MULTISTATE METROPOLITAN AREA .....	C-3
STATE OF MISSOURI .....	C-4
STATE OF KANSAS .....	C-5
STATE OF ILLINOIS .....	C-6
STATE OF OKLAHOMA .....	C-7

**Kansas City, MO-KS MA #3760**

Demographic Information for Full-Scope Area: Kansas City, MO-KS MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	414	10%	23%	41%	23%	3%
Population by Geography	1,425,365	5%	18%	49%	28%	<1%
Owner-Occupied Housing by Geography	359,880	3%	14%	52%	31%	0%
Businesses by Geography	91,263	4%	13%	44%	37%	2%
Farms by Geography	2,168	1%	8%	57%	34%	<1%
Family Distribution by Income Level	384,171	18%	18%	25%	39%	n/a
Distribution of Low- and Moderate-Income Families throughout AA Geographies	137,618	9%	29%	49%	13%	n/a
Median Family Income = \$37,652						
HUD Adjusted Median Family Income for 2002 = \$64,500						
Households Below the Poverty Level = 10%						
			Median Housing Value = \$67,517			
			Unemployment Rate (June 2003) = 6%			

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, 2003 HUD updated MFI, and Bureau of Labor Statistics.

The Kansas City AA consists of six contiguous counties in the Kansas City MA. These counties are Cass, Clay, Jackson, and Platte in Missouri; and Johnson and Wyandotte in Kansas. Low- and moderate-income tracts are predominately located in Jackson and Wyandotte Counties. The AA complies with the regulation and does not arbitrarily exclude any low- or Moderate-income (LMI) areas.

The economic conditions in the AA are generally stable. The June 2003 area unemployment rate is 6 percent compared to the state rate of 5.6 percent and the national rate of 6.4 percent for the same time-period. Varied employment industries in Kansas City include telecommunications, manufacturing, health care, financial services, engineering, and agribusiness. Major employers include DST Systems, Hallmark Cards, Inc., Sprint Corporation, Farmland Industries, Inc, and state and federal governments. The area has suffered from layoffs by major companies over the past three years including 6,000 workers at the Sprint Corporation, 1,500 at Aquila, Inc., a local utility cooperative, and 900 workers following the shutdown of Vanguard Airlines.

We performed three community contacts in this AA. Credit needs identified includes small business lending, affordable housing, and financial literacy programs particularly for the growing Hispanic market in Wyandotte County. Opportunities to participate in community development activities are readily available in this AA.

**St. Louis, MO-IL MA #7040**

Demographic Information for Full-Scope Area: St. Louis MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	435	13%	21%	44%	21%	1%
Population by Geography	2,286,591	7%	16%	48%	29%	<1%
Owner-Occupied Housing by Geography	590,131	3%	13%	52%	32%	0%
Businesses by Geography	113,373	5%	11%	49%	35%	<1%
Farms by Geography	3,153	1%	5%	66%	28%	<1%
Family Distribution by Income Level	607,415	19%	18%	24%	39%	n/a
Distribution of Low- and Moderate-Income Families throughout AA Geographies	221,864	14%	24%	49%	13%	n/a
Median Family Income = \$37,995		Median Housing Value = \$75,985				
HUD Adjusted Median Family Income for 2002 = \$61,400		Unemployment Rate (June 2003) = 6.2 %				
Households Below the Poverty Level = 11%						

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, 2002 HUD updated MFI, and Bureau of Labor Statistics.

The St. Louis AA consists of St. Louis City and five contiguous counties in the St. Louis MA. These counties are Jefferson, St. Charles, and St. Louis Missouri; and Madison and St. Clair in Illinois. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

Economic conditions in the AA are stable but trending adversely. The June 2003 area unemployment rate of 6.2 percent is only slightly higher than the state rate of 5.6 percent and lower than the national rate of 6.4 percent for the same time-period. St. Louis headquarters eight Fortune 500 companies ranking sixth in the nation for Fortune 500 companies. Major employers include Anheuser-Busch Company, Boeing, BJC Heath Systems, Chrysler Motors, Edward Jones, and the U.S. Air Force at Scott Air Force Base.

We performed one community contact in this AA. Credit needs identified includes lending for new business development and revitalization of downtown St. Louis. Additionally, home repair, especially for older homes located in pockets of depressed areas throughout the city and affordable housing is needed. Opportunities to participate in community development activities are readily available in this AA.

**State of Missouri**

**Joplin MA #3710**

Demographic Information for Full-Scope Area: Joplin MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	32	0%	9%	75%	16%	n/a
Population by Geography	134,910	0%	10%	74%	16%	n/a
Owner-Occupied Housing by Geography	38,017	0%	8%	76%	16%	n/a
Businesses by Geography	9,387	0%	16%	67%	17%	n/a
Farms by Geography	494	0%	4%	91%	5%	n/a
Family Distribution by Income Level	37,921	19%	19%	24%	38%	n/a
Distribution of Low- and Moderate-Income Families throughout AA Geographies	14,202	0%	14%	76%	10%	n/a
Median Family Income	= \$26,193	Median Housing Value		= \$40,312		
HUD Adjusted Median Family Income for 2002	= \$43,600	Unemployment Rate (June 2003)		= 5.8%		
Households Below the Poverty Level	= 16%					

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, 2002 HUD updated MFI, and Bureau of Labor Statistics.

The Joplin AA consists of Jasper and Newton Counties. The AA is contiguous, complies with the regulation, and does not arbitrarily exclude any LMI areas. Joplin is located in the southwest corner of Missouri, approximately five miles east of the Kansas state line and eight miles northeast of the Oklahoma state line.

Economic conditions in the AA are stable. The June 2003 area unemployment rate is 5.8 percent and generally approximates the state rate of 5.6 percent and national rate of 6.4 percent for the same time-period. Major industry for employment includes health care, manufacturing, and transportation.

We performed one community contact in this AA who identified small business financing and affordable housing, as primary credit needs. Opportunities to participate in community development activities are available in this AA.

**State of Kansas**

**Topeka MA #8440**

Demographic Information for Full-Scope Area: Topeka MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	5%	27%	46%	20%	2%
Population by Geography	160,976	3%	24%	42%	31%	<1
Owner-Occupied Housing by Geography	42,450	2%	20%	45%	33%	0%
Businesses by Geography	9,729	12%	23%	35%	29%	<1%
Farms by Geography	44	5%	27%	45%	21%	2%
Family Distribution by Income Level	43,025	18%	18%	26%	38%	n/a
Distribution of Low- and Moderate-Income Families throughout AA Geographies	15,466	5%	38%	40%	175	n/a
Median Family Income	= \$35,987	Median Housing Value		= \$55,484		
HUD Adjusted Median Family Income for 2002	= \$59,200	Unemployment Rate (June 2003)		= 4.3%		
Households Below the Poverty Level	= 10%					

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, 2002 HUD updated MFI, and the Bureau of Labor Statistics

The Topeka AA consists of Shawnee County. The AA complies with the regulation and does not arbitrarily exclude any LMI areas. Topeka, the state capital of Kansas, is located seventy miles west of Kansas City, Missouri.

The economy in Topeka is considered static with little overall growth in population since the 1990 census. We performed one community contact in this AA who stated the economy in Topeka is improving. A major retailer will open a distribution center in Topeka in early 2004. This has spurred additional inquiries to the city about new business development. Identified credit needs include small business development, especially for start-up entities. The June 2003 area unemployment rate of 4.3 percent is slightly lower than the state rate of 5 percent and lower than the national rate of 6.4 percent for the same time period. Major employers in the Topeka AA include state government, local school districts and higher education, manufacturing, and health care centers. Opportunities to participate in community development activities are available in this AA.

## State of Illinois

### Morrisonville AA

Demographic Information for Full-Scope Area: Morrisonville AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (BNAs)	18	0%	11%	88%	0%	n/a
Population by Geography	64,146	0%	9%	91%	0%	n/a
Owner-Occupied Housing by Geography	18,832	0%	8%	92%	0%	n/a
Businesses by Geography	971	0%	3%	97%	0%	n/a
Farms by Geography	18	0%	11%	89%	0%	n/a
Family Distribution by Income Level	17,994	19%	18%	25%	38%	n/a
Distribution of Low- and Moderate-Income Families throughout AA Geographies	6,713	0%	13%	87%	0%	n/a
Median Family Income = \$29,693		Median Housing Value = \$37,208				
HUD Adjusted Median Family Income for 2002 = \$46,700		Unemployment Rate (June 2003) = 6.1%				
Households Below the Poverty Level = 14%						

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, 2002 HUD updated MFI, and the Bureau of Labor Statistics.

The Morrisonville AA consists of Christian and Montgomery Counties. The AA complies with the regulation and does not arbitrarily exclude any LMI areas. Morrisonville is located in central Illinois approximately 76 miles northeast of St. Louis, Missouri and 37 miles south of Springfield, Illinois.

Economic conditions in the AA are generally static. Christian and Montgomery counties are rural agricultural areas. Agriculture, wholesale, and retail services are the major employment industries in this AA. The cities of Taylorville and Pana in Christian County, and Hillsboro and Litchfield in Montgomery County represent the largest potential for small business growth. The June 2003 area unemployment rate of 6.1 percent equals both the state rate of 6.3 percent and the national rate of 6.4 percent for the same time-period.

We performed one community contact in this AA. Credit needs identified includes small business lending and affordable housing. Opportunities to participate in community development activities, although somewhat limited, are available in this AA.



**State of Oklahoma**

**Oklahoma City MA #5880**

Demographic Information for Full-Scope Area: Oklahoma City MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	221	9%	27%	40%	22%	2%
Population by Geography	599,611	6%	26%	42%	26%	<1%
Owner-Occupied Housing by Geography	145,847	4%	22%	45%	29%	0%
Businesses by Geography	613	2%	19%	42%	36%	<1%
Farms by Geography	221	9%	27%	40%	22%	2%
Family Distribution by Income Level	161,080	21%	18%	22%	39%	n/a
Distribution of Low- and Moderate-Income Families throughout AA Geographies	63,304	10%	36%	42%	12%	0%
Median Family Income	= \$32,406	Median Housing Value		= \$55,156		
HUD Adjusted Median Family Income for 2002	= \$46,000	Unemployment Rate (June 2003)		= 5.7%		
Households Below the Poverty Level	= 14%					

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, 2002 HUD updated MFI, the Bureau of Labor Statistics.

The Oklahoma City AA consists of Oklahoma County. The AA complies with the regulation and does not arbitrarily exclude any LMI areas. Oklahoma City is the state capital, located in the center of the state approximately 110 miles south of the Kansas state boarder.

Economic conditions in the AA are generally good. Historically Oklahoma City relied on the oil sector to maintain its economy. During the 80s and 90s as the bottom started to drop out on oil, and manufacturing started to take a hit, the service sector became a primary industry. Numerous national Call Centers/Service Support Centers for industry with wages in the \$30-40 thousand per year range have emerged in the service sector. The June 2003 area unemployment rate of 5.7 percent is equal to the state rate of 5.9 percent and somewhat lower than the national rate of 6.4 percent for the same time-period. Major types of employers in Oklahoma City include the above mentioned service sector, aviation, and oil companies.

We performed one community contact in this AA. Credit needs identified includes small business financing and affordable housing. Opportunities to participate in community development activities are available in this AA.

# Appendix D: Tables of Performance Data

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CONTENT OF STANDARDIZED TABLES ..... D-2

TABLES OF PERFORMANCE DATA .....D-5

## Content of Standardized Tables

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A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of 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: 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. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s AA 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.
- Table 1a. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

**Table 6.** Geographic Distribution of Small Loans to Businesses - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

**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 AA.

**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 AA. See Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments.

**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: MO/KS/IL/OK												
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Multistate MA's:</b>												
Kansas City MA (FS)	100%	2,059	92,976	3,125	557,754	91	3,974	40	66,919	5,315	721,623	100%
St. Louis MA (FS)	100%	3,507	79,883	704	120,345	22	1,191	46	60,978	4,279	262,397	100%
<b>State of Missouri:</b>												
Joplin MA (FS)	11%	182	8,737	249	8,254	168	3,128	2	78	601	20,197	14%
Columbia MA (LS)	7%	66	3,583	57	5,124	13	117	2	3,460	138	12,284	4%
Springfield MA (LS)	13%	156	8,392	102	15,486	10	242	1	207	269	24,327	8%
St. Joseph MA (LS)	11%	208	7,165	139	11,420	78	1,201	2	50	427	19,836	18%
Combined Non-MA AAs (LS)	58%	699	26,737	1,039	52,525	1,439	27,799	1	21	3,178	107,082	56%
<b>State of Kansas:</b>												
Topeka MA (FS)	17%	55	2,051	92	7,787	2	150	2	21	151	10,009	56%
Lawrence MA (LS)	13%	8	308	50	7,227	1	100	0	0	59	7,635	3%
Wichita MA (LS)	39%	29	607	151	22,380	2	130	0	0	182	23,117	7%
Combined Non-MA AAs (LS)	31%	203	7,180	183	5,479	183	5,682	0	0	569	18,341	34%
<b>State of Illinois:</b>												
Morrisonville AA (FS)	100%	10	191	47	480	8	63	0	0	65	734	100%
<b>State of Oklahoma:</b>												
Oklahoma City MA (FS)	100%	98	7,564	661	71,628	10	260	6	1,045	775	80,497	100%

(FS = Full Scope; LS = Limited Scope)

\* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is From January 01, 2000 to December 31, 2002.

\*\*\* Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1a. Other Products

LENDING VOLUME		Geography: MO/KS/IL/OK				Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Other Secured Consumer**		Other Unsecured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Multistate MA's:</b>														
Kansas City MA (FS)	100%	5,994	180,553	103	38,637	432	28,202	4,487	69,949	888	39,781	84	3,984	100%
St. Louis MA (FS)	100%	5,881	113,573	8	2,896	259	15,803	5,065	77,468	462	16,081	87	1,325	100%
<b>State of Missouri:</b>														
Joplin MA (FS)	12%	973	14,487	3	214	30	1,526	689	9,031	179	3,242	72	474	14%
Columbia MA (LS)	7%	588	9,791	2	39	4	148	536	8,727	33	800	13	77	4%
Springfield MA (LS)	10%	782	16,116	4	2,159	20	1,642	692	9,792	56	2,443	10	80	8%
St. Joseph MA (LS)	10%	787	12,371	4	584	20	906	642	8,808	95	1,885	26	188	18%
Combined Non-MA AAs (LS)	61%	4,800	61,584	17	3,367	129	6,571	3,198	38,546	1,024	11,732	432	1,268	56%
<b>State of Kansas:</b>														
Topeka MA (FS)	28%	505	8,506	10	800	24	802	416	5,749	49	1,139	6	16	56%
Lawrence MA (LS)	14%	250	4,433	1	372	5	133	223	3,323	21	605	0	0	3%
Wichita MA (LS)	16%	286	8,406	2	690	2	290	268	6,885	14	541	0	0	7%
Combined Non-MA AAs (LS)	42%	736	9,212	6	197	54	2,191	453	4,814	167	1,860	56	150	34%
<b>State of Illinois:</b>														
Morrisonville AA (FS)	100%	81	1,060	0	0	1	29	68	824	10	203	2	4	100%
<b>State of Oklahoma:</b>														
Oklahoma City MA (FS)	100%	726	22,589	36	7,128	27	1,559	550	9,799	104	4,054	9	49	100%

(FS = Full Scope; LS = Limited Scope)

\* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is From January 01, 2001 to December 31, 2002.

\*\*\* Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: MO/KS/IL/OK				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	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						
<b>Multistate MA's:</b>																
Kansas City MA (FS)	272	100%	3%	2%	14%	9%	52%	44%	31%	45%	0.24	0.24	0.29	0.20	0.28	
St. Louis MA (FS)	195	100%	3%	< 1%	13%	9%	52%	53%	32%	38%	0.12	0.10	0.08	0.10	0.15	
<b>State of Missouri:</b>																
Joplin MA (FS)	45	16%	n/a	n/a	8%	7%	76%	80%	16%	13%	0.47	n/a	0.92	0.50	0.18	
Columbia MA (LS)	18	6%	2%	0%	10%	6%	64%	83%	24%	11%	0.43	0.00	0.38	0.54	0.15	
Springfield MA (LS)	25	9%	< 1%	0%	17%	0%	63%	72%	20%	28%	0.08	0.00	0.00	0.10	0.05	
St. Joseph MA (LS)	28	10%	2%	0%	15%	25%	53%	39%	30%	36%	0.69	0.00	0.95	0.75	0.57	
Combined Non-MA AAs (LS)	164	59%	< 1%	1%	4%	3%	65%	65%	31%	31%	1.46	16.67	1.25	1.48	1.40	
<b>State of Kansas:</b>																
Topeka MA (FS)	8	11%	2%	13%	20%	13%	45%	37%	33%	37%	0.11	0.00	0.00	0.07	0.20	
Lawrence MA (LS)	1	1%	< 1%	0%	11%	0%	65%	100%	24%	0%	0.04	0.00	0.00	0.07	0.00	
Wichita MA (LS)	2	3%	4%	0%	16%	0%	53%	50%	27%	50%	0.02	0.00	0.00	0.02	0.02	
Combined Non-MA AAs (LS)	62	85%	n/a	n/a	19%	24%	81%	76%	n/a	n/a	9.13	n/a	11.90	8.43	n/a	
<b>State of Illinois:</b>																
Morrisonville AA (FS)	3	100%	n/a	n/a	8%	0%	92%	100%	n/a	n/a	0.18	n/a	0.00	0.18	n/a	
<b>State of Oklahoma:</b>																
Oklahoma City MA (FS)	36	100%	4%	0%	22%	17%	45%	33%	29%	50%	0.11	0.00	0.10	0.12	0.11	

(FS = Full Scope; LS = Limited Scope)

\* Based on 2001 Peer Mortgage Data: Midwest, Central, and Southwest Regions.

\*\* 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.



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

Geographic Distribution: HOME IMPROVEMENT															
Geography: MO/KS/IL/OK															
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002															
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	Overall	Low	Mod	Mid	Upp
<b>Multistate MA's:</b>															
Kansas City MA (FS)	1,391	100%	3%	2%	14%	11%	52%	54%	31%	33%	10.37	10.34	11.15	10.38	10.11
St. Louis MA (FS)	3,031	100%	3%	1%	13%	9%	52%	57%	32%	33%	15.08	8.82	14.50	16.53	13.64
<b>State of Missouri:</b>															
Joplin MA(FS)	68	11%	n/a	n/a	8%	19%	76%	68%	16%	13%	4.98	n/a	8.57	5.38	1.35
Columbia MA (LS)	38	6%	2%	0%	10%	0%	64%	74%	24%	26%	4.85	0.00	0.00	5.53	5.56
Springfield MA (LS)	80	13%	< 1%	0%	17%	12%	63%	59%	20%	29%	4.07	0.00	2.06	3.90	6.25
St. Joseph MA (LS)	123	20%	2%	< 1%	15%	25%	53%	51%	30%	24%	10.84	0.00	16.67	11.17	6.85
Combined Non-MA AAs (LS)	307	50%	< 1%	0%	4%	< 1%	65%	74%	31%	26%	17.51	0.00	0.00	20.17	13.41
<b>State of Kansas:</b>															
Topeka MA (FS)	36	27%	2%	0%	20%	19%	45%	48%	33%	33%	2.43	0.00	2.78	2.25	2.67
Lawrence MA (LS)	6	5%	< 1%	0%	11%	0%	65%	50%	24%	50%	0.84	0.00	0.00	0.66	1.75
Wichita MA (LS)	26	20%	4%	4%	16%	19%	53%	62%	27%	15%	0.20	1.28	0.00	0.16	0.22
Combined Non-MA AAs (LS)	64	48%	n/a	n/a	19%	17%	81%	83%	n/a	n/a	52.63	n/a	57.14	52.00	n/a
<b>State of Illinois:</b>															
Morrisonville AA (FS)	6	100%	n/a	n/a	8%	0%	92%	100%	n/a	n/a	2.97	n/a	0.00	3.19	n/a
<b>State of Oklahoma:</b>															
Oklahoma City MA (FS)	21	100%	4%	19%	22%	14%	45%	38%	29%	29%	0.31	1.35	0.19	0.23	0.40

(FS = Full Scope; LS = Limited Scope)

\* Based on 2001 Peer Mortgage Data: Midwest, Central, and Southwest Regions.

\*\* 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 housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MO/KS/IL/OK				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Multistate MA's:</b>																
Kansas City MA (FS)	394	100%	3%	3%	14%	6%	52%	48%	31%	43%	0.19	0.40	0.24	0.20	0.18	
St. Louis MA (FS)	279	100%	3%	0%	13%	4%	52%	47%	32%	49%	0.10	0.00	0.06	0.10	0.10	
<b>State of Missouri:</b>																
Joplin MA (FS)	69	17%	n/a	n/a	8%	10%	76%	75%	16%	15%	0.60	n/a	0.78	0.54	0.85	
Columbia MA (LS)	10	2%	2%	0%	10%	0%	64%	80%	24%	20%	0.06	0.00	0.00	0.06	0.08	
Springfield MA (LS)	51	12%	< 1%	0%	17%	12%	63%	63%	20%	25%	0.15	0.00	0.37	0.13	0.14	
St. Joseph MA (LS)	57	14%	2%	2%	15%	12%	53%	47%	30%	39%	0.67	0.00	1.49	0.76	0.35	
Combined Non-MA AAs (LS)	225	55%	< 1%	< 1%	4%	< 1%	65%	78%	31%	21%	1.13	0.00	0.00	1.28	0.91	
<b>State of Kansas:</b>																
Topeka MA (FS)	11	12%	2%	9%	20%	0%	45%	9%	33%	82%	0.11	0.00	0.00	0.00	0.25	
Lawrence MA (LS)	1	1%	< 1%	0%	11%	0%	65%	100%	24%	0%	0.02	0.00	0.00	0.04	0.00	
Wichita MA (LS)	1	1%	4%	0%	16%	100%	53%	0%	27%	0%	0.00	0.00	0.00	0.00	0.00	
Combined Non-MA AAs (LS)	76	86%	n/a	n/a	19%	25%	81%	75%	n/a	n/a	9.97	n/a	11.54	9.73	n/a	
<b>State of Illinois:</b>																
Morrisonville AA (FS)	1	100%	n/a	n/a	8%	0%	92%	100%	n/a	n/a	0.00	n/a	0.00	0.00	n/a	
<b>State of Oklahoma:</b>																
Oklahoma City MA (FS)	40	100%	4%	0%	22%	23%	45%	15%	29%	62%	0.09	0.00	0.19	0.02	0.12	

(FS = Full Scope; LS = Limited Scope)

\* Based on 2001 Peer Mortgage Data: Midwest, Central, and Southwest Regions.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

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

Geographic Distribution: MULTIFAMILY															Geography: MO/KS/IL/OK					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
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	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Multistate MA's:</b>																								
Kansas City MA (FS)	2	100%	7%	0%	27%	50%	41%	50%	25%	0%	0.00	0.00	0.00	0.00	0.00									
St. Louis MA (FS)	2	100%	12%	0%	13%	50%	48%	50%	27%	0%	0.22	0.00	0.00	0.43	0.00									
<b>State of Missouri:</b>																								
Joplin MA (FS)	0	0%	n/a	n/a	37%	n/a	40%	n/a	23%	n/a	0.00	n/a	0.00	0.00	0.00									
Columbia MA (LS)	0	0%	25%	n/a	38%	n/a	28%	n/a	9%	n/a	0.00	0.00	0.00	0.00	0.00									
Springfield MA (LS)	0	0%	5%	n/a	28%	n/a	57%	n/a	10%	n/a	0.00	0.00	0.00	0.00	0.00									
St. Joseph MA (LS)	0	0%	18%	n/a	20%	n/a	29%	n/a	33%	n/a	0.00	0.00	0.00	0.00	0.00									
Combined Non-MA AAs (LS)	3	100%	7%	0%	3%	0%	57%	33%	33%	67%	3.23	0.00	0.00	6.25	0.00									
<b>State of Kansas:</b>																								
Topeka MA (FS)	0	0%	7%	n/a	23%	n/a	34%	n/a	36%	n/a	0.00	0.00	0.00	0.00	0.00									
Lawrence MA (LS)	0	0%	9%	n/a	19%	n/a	45%	n/a	27%	n/a	0.00	0.00	0.00	0.00	0.00									
Wichita MA (LS)	0	0%	5%	n/a	21%	n/a	53%	n/a	21%	n/a	0.00	0.00	0.00	0.00	0.00									
Combined Non-MA AAs (LS)	1	100%	n/a	n/a	4%	0%	96%	100%	n/a	n/a	50.00	n/a	0.00	50.00	n/a									
<b>State of Illinois:</b>																								
Morrisonville AA (FS)	0	0%	n/a	n/a	18%	n/a	82%	n/a	n/a	n/a	0.00	n/a	0.00	0.00	n/a									
<b>State of Oklahoma:</b>																								
Oklahoma City MA (FS)	1	100%	6%	0%	32%	0%	42%	0%	20%	100%	0.09	0.00	0.19	0.01	0.12									

(FS = Full Scope; LS = Limited Scope)

\* Based on 2001 Peer Mortgage Data: Midwest, Central, and Southwest Regions.

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: MO/KS/IL/OK				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans						
<b>Multistate MA's:</b>																
Kansas City MA (FS)	3,125	100%	4%	9%	12%	18%	44%	43%	37%	30%	2.47	4.34	4.18	2.15	1.96	
St. Louis MA (FS)	704	100%	5%	4%	11%	10%	49%	61%	35%	25%	0.49	0.48	0.43	0.59	0.40	
<b>State of Missouri:</b>																
Joplin MA (FS)	249	16%	n/a	n/a	16%	13%	67%	78%	17%	9%	1.95	n/a	1.97	2.33	0.88	
Columbia MA (LS)	57	3%	24%	11%	14%	3%	49%	67%	13%	19%	0.51	0.49	0.00	0.62	0.62	
Springfield MA (LS)	102	6%	3%	0%	15%	18%	64%	65%	18%	17%	0.30	0.00	0.63	0.32	0.13	
St. Joseph MA (LS)	139	9%	11%	16%	12%	18%	39%	39%	38%	27%	1.93	2.30	4.35	1.43	1.71	
Combined Non-MA AAs (LS)	1,039	66%	3%	< 1%	2%	1%	68%	70%	27%	28%	4.16	0.48	1.52	5.15	3.53	
<b>State of Kansas:</b>																
Topeka MA (FS)	92	19%	12%	11%	23%	38%	35%	23%	30%	28%	0.66	0.48	1.40	0.53	0.45	
Lawrence MA (LS)	50	11%	2%	0%	15%	14%	58%	42%	25%	44%	0.45	0.00	0.55	0.23	0.86	
Wichita MA (LS)	151	32%	8%	14%	23%	26%	40%	43%	29%	17%	0.39	0.28	0.78	0.47	0.10	
Combined Non-MA AAs (LS)	183	38%	n/a	n/a	11%	21%	89%	79%	n/a	n/a	10.22	n/a	15.79	9.66	n/a	
<b>State of Illinois:</b>																
Morrisonville AA (FS)	47	100%	n/a	n/a	8%	0%	92%	100%	n/a	n/a	2.13	n/a	0.00	2.58	n/a	
<b>State of Oklahoma:</b>																
Oklahoma City MA (FS)	661	100%	6%	9%	25%	29%	38%	32%	27%	30%	1.38	2.32	1.80	1.25	1.34	

(FS = Full Scope; LS = Limited Scope)

\* Based on 2001 Peer Small Business Data: US&amp;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 (2002).

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

Geographic Distribution: SMALL LOANS TO FARMS															Geography: MO/KS/IL/OK		Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Multistate MA's:</b>																					
Kansas City MA (FS)	91	100%	1%	0%	8%	8%	57%	73%	33%	19%	5.30	0.00	4.76	7.69	2.70						
St. Louis MA (FS)	22	100%	< 1%	0%	5%	4%	67%	64%	28%	32%	0.30	0.00	0.00	0.37	0.00						
<b>State of Missouri:</b>																					
Joplin MA (FS)	168	10%	n/a	n/a	4%	1%	91%	98%	5%	1%	16.26	n/a	0.00	16.50	0.00						
Columbia MA (LS)	13	1%	3%	0%	6%	0%	76%	100%	15%	0%	0.56	0.00	0.00	0.68	0.00						
Springfield MA (LS)	10	< 1%	< 1%	0%	9%	20%	76%	80%	14%	0%	0.43	0.00	0.00	0.48	0.00						
St. Joseph MA (LS)	78	5%	< 1%	1%	2%	5%	63%	59%	34%	35%	5.01	0.00	0.00	5.04	5.33						
Combined Non-MA AAs (LS)	1,439	84%	< 1%	0%	1%	1%	77%	81%	22%	18%	13.41	0.00	3.41	13.07	18.09						
<b>State of Kansas:</b>																					
Topeka MA (FS)	2	1%	4%	0%	9%	0%	60%	50%	27%	50%	2.17	0.00	0.00	0.00	10.00						
Lawrence MA (LS)	1	1%	0%	0%	3%	0%	81%	100%	16%	0%	0.00	0.00	0.00	0.00	0.00						
Wichita MA (LS)	2	1%	2%	0%	8%	0%	56%	50%	34%	50%	0.00	0.00	0.00	0.00	0.00						
Combined Non-MA AAs (LS)	183	97%	n/a	n/a	11%	21%	89%	79%	n/a	n/a	81.82	n/a	87.50	79.49	n/a						
<b>State of Illinois:</b>																					
Morrisonville AA (FS)	8	100%	n/a	n/a	3%	0.00	97%	100.00	n/a	n/a	0.88	n/a	0.00	0.90	n/a						
<b>State of Oklahoma:</b>																					
Oklahoma City MA (FS)	10	100%	3%	10%	19%	0%	42%	60%	36%	30%	1.10	0.00	0.00	2.04	0.00						

(FS = Full Scope; LS = Limited Scope)

\* Based on 2001 Peer Small Business Data: US&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 (2002).

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

Borrower Distribution: HOME PURCHASE															Geography: MO/KS/IL/OK					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
<b>Multistate MA's:</b>																								
Kansas City MA (FS)	272	100%	18%	10%	18%	24%	25%	17%	39%	49%	0.29	0.22	0.19	0.24	0.42									
St. Louis MA (FS)	195	100%	19%	6%	18%	31%	24%	26%	39%	37%	0.15	0.04	0.22	0.09	0.18									
<b>State of Missouri:</b>																								
Joplin MA (FS)	45	16%	19%	9%	19%	17%	24%	24%	38%	50%	0.47	0.30	0.42	0.70	0.40									
Columbia MA (LS)	18	6%	19%	17%	19%	17%	23%	22%	39%	44%	0.47	0.84	0.15	0.50	0.53									
Springfield MA (LS)	25	9%	18%	8%	19%	4%	24%	36%	39%	52%	0.10	0.00	0.05	0.10	0.17									
St. Joseph MA (LS)	28	10%	21%	19%	17%	11%	23%	26%	39%	44%	0.75	0.65	0.24	0.90	1.02									
Combined Non-MA AAs (LS)	164	59%	16%	10%	16%	16%	22%	27%	46%	47%	1.77	3.17	1.48	2.03	1.57									
<b>State of Kansas:</b>																								
Topeka MA (FS)	8	11%	18%	29%	18%	43%	26%	14%	38%	14%	0.13	0.17	0.12	0.12	0.12									
Lawrence MA (LS)	1	1%	20%	0%	16%	0%	25%	0%	39%	100%	0.05	0.00	0.00	0.00	0.10									
Wichita MA (LS)	2	3%	18%	0%	18%	100%	25%	0%	39%	0%	0.02	0.00	0.08	0.00	0.00									
Combined Non-MA AAs (LS)	62	85%	22%	8%	19%	12%	26%	41%	33%	39%	10.59	20.00	2.50	17.31	6.90									
<b>State of Illinois:</b>																								
Morrisonville AA (FS)	3	100%	19%	33%	18%	33%	25%	0%	38%	33%	0.21	0.00	0.81	0.00	0.00									
<b>State of Oklahoma:</b>																								
Oklahoma City MA (FS)	36	100%	21%	6%	18%	17%	22%	17%	39%	60%	0.13	0.08	0.09	0.09	0.19									

(FS = Full Scope; LS = Limited Scope)

\* Based on 2001 Peer Mortgage Data: Midwest, Central, and Southwest Regions.

\*\* As a percentage of loans with borrower income information available. No information was available for 1.63% of loans originated and purchased by the bank.

\*\*\* Percentage of Families is based on the 1990 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.

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT															Geography: MO/KS/IL/OK		Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp						
<b>Multistate MA's:</b>																					
Kansas City MA (FS)	1,391	100%	18%	15%	18%	24%	25%	29%	39%	32%	10.80	12.64	11.97	9.81	10.04						
St. Louis MA (FS)	3,031	100%	19%	13%	18%	23%	24%	31%	39%	33%	15.69	13.59	16.75	17.90	14.19						
<b>State of Missouri:</b>																					
Joplin MA (FS)	68	11%	19%	18%	19%	22%	24%	25%	38%	35%	4.93	9.09	9.38	3.03	2.45						
Columbia MA (LS)	38	6%	19%	3%	19%	23%	23%	34%	39%	40%	5.05	2.70	5.77	6.58	4.55						
Springfield MA (LS)	80	13%	18%	5%	19%	19%	25%	40%	39%	36%	4.19	2.30	5.37	3.86	4.42						
St. Joseph MA (LS)	123	20%	21%	11%	17%	33%	23%	28%	39%	28%	11.37	10.00	18.00	12.24	7.36						
Combined Non-MA AAs (LS)	307	50%	16%	14%	16%	16%	22%	25%	46%	45%	17.45	28.30	17.69	13.64	17.92						
<b>State of Kansas:</b>																					
Topeka MA (FS)	36	27%	18%	17%	18%	29%	26%	29%	38%	25%	2.49	2.88	2.50	2.35	2.42						
Lawrence MA (LS)	6	5%	20%	0%	16%	40%	25%	40%	39%	20%	0.86	0.00	0.00	1.25	1.04						
Wichita MA (LS)	26	20%	18%	11%	18%	31%	25%	23%	39%	35%	0.20	0.29	0.18	0.14	0.24						
Combined Non-MA AAs (LS)	64	48%	22%	14%	19%	19%	26%	33%	33%	35%	54.55	33.33	38.46	81.25	52.94						
<b>State of Illinois:</b>																					
Morrisonville AA (FS)	6	100%	19%	17%	18%	17%	25%	50%	38%	16%	3.06	12.50	0.00	6.90	0.00						
<b>State of Oklahoma:</b>																					
Oklahoma City MA (FS)	21	100%	21%	14%	18%	33%	22%	10%	39%	43%	0.32	0.00	0.33	0.00	0.58						

(FS = Full Scope; LS = Limited Scope)

\* Based on 2001 Peer Mortgage Data: Midwest, Central, and Southwest Regions.

\*\* As a percentage of loans with borrower income information available. No information was available for 0.71% of loans originated and purchased by the bank.

\*\*\* Percentage of Families is based on the 1990 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.

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: MO/KS/IL/OK					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
<b>Multistate MA's:</b>																								
Kansas City MA (FS)	394	100%	18%	12%	18%	23%	25%	26%	39%	39%	0.24	0.24	0.29	0.20	0.25									
St. Louis MA (FS)	279	100%	19%	10%	18%	19%	24%	23%	39%	48%	0.13	0.08	0.12	0.11	0.15									
<b>State of Missouri:</b>																								
Joplin MA (FS)	69	17%	19%	13%	19%	24%	24%	16%	38%	47%	0.70	1.26	0.95	0.95	0.87									
Columbia MA (LS)	10	2%	19%	0%	19%	20%	23%	10%	39%	70%	0.07	0.00	0.14	0.00	0.11									
Springfield MA (LS)	51	12%	18%	4%	19%	18%	24%	26%	39%	52%	0.21	0.19	0.29	0.13	0.22									
St. Joseph MA (LS)	57	14%	21%	16%	17%	14%	23%	35%	39%	35%	0.83	1.78	0.65	0.86	0.73									
Combined Non-MA AAs (LS)	225	55%	16%	9%	16%	11%	22%	23%	46%	57%	1.34	2.42	0.85	1.73	1.20									
<b>State of Kansas:</b>																								
Topeka MA (FS)	11	12%	18%	9%	18%	9%	26%	36%	38%	46%	0.14	0.00	0.13	0.19	0.14									
Lawrence MA (LS)	1	1%	20%	0%	16%	100%	25%	0%	39%	0%	0.03	0.00	0.16	0.00	0.00									
Wichita MA (LS)	1	1%	18%	0%	18%	0%	25%	0%	39%	100%	0.00	0.00	0.00	0.00	0.00									
Combined Non-MA AAs (LS)	76	85%	22%	9%	19%	18%	26%	32%	33%	41%	11.41	12.00	8.93	11.70	12.03									
<b>State of Illinois:</b>																								
Morrisonville AA (FS)	1	100%	19%	0%	18%	0%	25%	100%	38%	0%	0.00	0.00	0.00	0.00	0.00									
<b>State of Oklahoma:</b>																								
Oklahoma City MA (FS)	40	100%	21%	5%	18%	8%	22%	22%	39%	65%	0.11	0.24	0.09	0.10	0.10									

(FS = Full Scope; LS = Limited Scope)

\* Based on 2001 Peer Mortgage Data: Midwest, Central, and Southwest Regions.

\*\* As a percentage of loans with borrower income information available. No information was available for 0.99% of loans originated and purchased by the bank.

\*\*\* Percentage of Families is based on the 1990 Census information.

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



Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MO/KS/IL/OK			Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Multistate MA's:</b>									
Kansas City MA (FS)	3,125	100%	72%	39%	59%	19%	22%	2.47	2.10
St. Louis MA (FS)	704	100%	77%	53%	59%	21%	20%	0.49	0.56
<b>State of Missouri:</b>									
Joplin MA (FS)	249	16%	79%	86%	95%	3%	2%	1.95	2.53
Columbia MA (LS)	57	3%	80%	77%	81%	7%	12%	0.51	0.70
Springfield MA (LS)	102	6%	76%	65%	64%	19%	17%	0.30	0.27
St. Joseph MA (LS)	139	9%	79%	67%	84%	7%	9%	1.93	1.60
Combined Non-MA AAs (LS)	1,039	66%	79%	82%	91%	4%	5%	4.16	5.53
<b>State of Kansas:</b>									
Topeka MA (FS)	92	19%	70%	63%	80%	12%	8%	0.66	0.78
Lawrence MA (LS)	50	11%	72%	54%	60%	18%	22%	0.45	0.55
Wichita MA (LS)	151	32%	70%	31%	61%	22%	17%	0.39	0.10
Combined Non-MA AAs (LS)	183	38%	71%	89%	94%	4%	2%	10.22	20.30
<b>State of Illinois:</b>									
Morrisonville AA (FS)	47	100%	81%	83%	100%	0%	0%	2.13	2.88
<b>State of Oklahoma:</b>									
Oklahoma City MA (FS)	661	100%	80%	62%	72%	16%	12%	1.38	1.58

(FS = Full Scope; LS = Limited Scope)

\* Based on 2001 Peer Small Business Data: US&amp;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&amp;B - 2002).

\*\*\*\* 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 4.33% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: MO/KS/IL/OK									
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Multistate MA's:</b>									
Kansas City MA (FS)	91	100%	92%	90%	91%	4%	5%	5.30	4.07
St. Louis MA (FS)	22	100%	94%	95%	73%	27%	0%	0.30	0.33
<b>State of Missouri:</b>									
Joplin MA (FS)	168	10%	96%	96%	97%	2%	1%	16.26	15.58
Columbia MA (LS)	13	1%	97%	92%	100%	0%	0%	0.56	0.60
Springfield MA (LS)	10	< 1%	96%	100%	100%	0%	0%	0.43	0.46
St. Joseph MA (LS)	78	5%	98%	95%	100%	0%	0%	5.01	4.12
Combined Non-MA AAs (LS)	1,439	84%	98%	93%	98%	2%	< 1%	13.41	12.21
<b>State of Kansas:</b>									
Topeka MA (FS)	2	1%	93%	100%	50%	50%	0%	2.17	2.17
Lawrence MA (LS)	1	1%	94%	100%	100%	0%	0%	0.00	0.00
Wichita MA (LS)	2	1%	93%	50%	50%	50%	0%	0.00	0.00
Combined Non-MA AAs (LS)	183	97%	98%	96%	96%	2%	2%	81.82	87.50
<b>State of Illinois:</b>									
Morrisonville AA (FS)	8	100%	99%	100%	100%	0%	0%	0.88	0.93
<b>State of Oklahoma:</b>									
Oklahoma City MA (FS)	10	100%	92%	90%	100%	0%	0%	1.10	1.39

(FS = Full Scope; LS = Limited Scope)

\* Based on 2001 Peer Small Business Data: US&amp;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&amp;B - 2002).

\*\*\*\* 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 3.55% of small loans to farms originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																		
Geography: MO/KS/IL/OK																		
Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002																		
MA/Assessment Area:	Geographic Distribution										Borrower Distribution							
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans
<b>Multistate MA's:</b>																		
Kansas City MA (FS)	5891	100%	4%	1%	19%	6%	50%	48%	27%	45%	22%	11%	16%	19%	21%	45%	41%	25%
St. Louis MA (FS)	5873	100%	7%	1%	16%	5%	50%	51%	27%	43%	23%	12%	16%	20%	20%	26%	41%	42%
<b>State of Missouri:</b>																		
Joplin MA (FS)	970	12%	n/a	n/a	12%	7%	72%	76%	16%	17%	24%	8%	16%	20%	19%	27%	41%	45%
Columbia MA (LS)	586	7%	9%	2%	19%	5%	54%	69%	18%	24%	25%	10%	15%	15%	18%	26%	42%	49%
Springfield MA (LS)	778	10%	1%	< 1%	22%	7%	60%	65%	17%	28%	24%	7%	16%	17%	20%	26%	40%	50%
St. Joseph MA (LS)	783	10%	4%	1%	18%	10%	50%	49%	28%	50%	25%	10%	15%	16%	19%	22%	41%	52%
Combined Non-MA AAs (LS)	4783	61%	1%	< 1%	3%	1%	66%	65%	30%	34%	21%	13%	15%	20%	18%	23%	46%	44%
<b>State of Kansas:</b>																		
Topeka MA (FS)	495	28%	3%	< 1%	25%	16%	42%	37%	30%	46%	22%	17%	17%	23%	22%	26%	39%	34%
Lawrence MA (LS)	249	14%	2%	1%	18%	6%	58%	56%	22%	37%	28%	7%	14%	22%	16%	25%	42%	46%
Wichita MA (LS)	284	16%	6%	< 1%	21%	11%	50%	38%	23%	51%	22%	5%	17%	19%	21%	26%	40%	50%
Combined Non-MA AAs (LS)	730	42%	n/a	n/a	19%	22%	81%	78%	n/a	n/a	27%	16%	16%	23%	20%	27%	37%	34%
<b>State of Illinois:</b>																		
Morrisonville AA (FS)	81	100%	n/a	n/a	9%	4%	91%	96%	n/a	n/a	24%	4%	16%	22%	19%	35%	41%	39%
<b>State of Oklahoma:</b>																		
Oklahoma City MA (FS)	690	100%	5%	3%	27%	16%	43%	38%	25%	43%	24%	9%	17%	18%	20%	22%	39%	51%

(FS = Full Scope; LS = Limited Scope)

\* Consumer loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of Households is based on the 1990 Census Information.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: MO/KS/IL/OK									
Evaluation Period: MAY 23, 2003 TO JULY 7, 2003									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Multistate MA's:</b>									
Kansas City MA (FS)	4	42,550	38	908	42	43,458	100%	0	0
St. Louis MA (FS)	3	1,758	182	544	185	2,302	100%	0	0
<b>State of Missouri:</b>									
Joplin MA (FS)	1	61	7	1,511	8	1,572	15%	0	0
Columbia MA (LS)	1	15	1	0	2	15	< 1%	0	0
Springfield MA (LS)	1	36	10	11	11	47	< 1%	0	0
St. Joseph MA (LS)	3	830	12	39	15	869	8%	0	0
Combined Non-MA AAs (LS)	4	7,628	10	507	14	8,135	76%	0	0
<b>State of Kansas:</b>									
Topeka MA (FS)	1	73	8	16	9	89	2%	0	0
Lawrence MA (LS)	1	4	3	2	4	6	< 1%	0	0
Wichita MA (LS)	1	9	4	10	5	19	< 1%	0	0
Combined Non-MA AAs (LS)	1	45	7	3,509	8	3,555	97%	0	0
<b>State of Illinois:</b>									
Morrisonville AA (FS)	1	14	4	0	5	14	100%	0	0
<b>State of Oklahoma:</b>									
Oklahoma City MA (FS)	1	95	8	23	9	118	100%	0	0

(FS = Full Scope; LS = Limited Scope)

\* '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 that are tracked and recorded by the institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: MO/KS/IL/OK								Evaluation Period: MAY 23, 2000 TO JULY 7, 2003									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Multistate MA's:</b>																	
Kansas City MA (FS)	100%	41*	100%	3%	5%	64%	28%	1	4	0	0	-2	-1	5%	18%	49%	28%
St. Louis MA (FS)	100%	27	100%	0	7%	56%	37%	3	6	0	-1	-2	0	7%	16%	48%	29%
<b>State of Missouri:</b>																	
Joplin MA (FS)	14%	5	13%	0	20%	60%	20%	0	0	0	0	0	0	0	10%	74%	16%
Columbia MA (LS)	4%	3	8%	33%	33%	0	33%	0	0	0	0	0	0	14%	16%	53%	17%
Springfield MA (LS)	8%	6	16%	0	0	67%	33%	1	1	0	0	-1	+1	1%	23%	59%	17%
St. Joseph MA (LS)	18%	5	13%	0	40%	40%	20%	0	0	0	0	0	0	4%	17%	50%	29%
Combined Non-MA AAs (LS)	56%	19	50%	0	0	84%	16%	0	1	0	0	0	-1	1%	3%	65%	31%
<b>State of Kansas:</b>																	
Topeka MA (FS)	56%	4	40%	0	75%	0	25%	0	0	0	0	0	0	3%	24%	42%	31%
Lawrence MA (LS)	3%	1	10%	0	0	0	100%	0	0	0	0	0	0	6%	17%	57%	20%
Wichita MA (LS)	7%	2	20%	0	50%	0	50%	0	0	0	0	0	0	7%	20%	49%	24%
Combined Non-MA AAs (LS)	34%	3	30%	0	0	100%	0	0	0	0	0	0	0	0	18%	82%	0
<b>State of Illinois:</b>																	
Morrisonville AA (FS)	100%	1	100%	0	0	100%	0	0	0	0	0	0	0	0	9%	91%	0
<b>State of Oklahoma:</b>																	
Oklahoma City MA (FS)	100%	6**	86%	25%	0	25%	50%	0	0	0	0	0	0	6%	26%	42%	26%

(FS = Full Scope; LS = Limited Scope)

\*Kansas City—2 branches, representing 5% of the AA's branches, are located in CTs with no income designation. Less than 1/10 of 1% of the population lives in CTs with no income designation.

\*\* Oklahoma City—2 branches, representing 33% of the AA's branches, are located in CTs with no income designation. Less than 1/10 of 1% of the population lives in CTs with no income designation.