



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Commerce Bank, National Association
Charter Number: 18112**

**1000 Walnut Street
Kansas City, MO 64106**

Office of the Comptroller of the Currency

**Midsized Bank Supervision
440 South LaSalle Street, Suite 2700
Chicago, IL 60605**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated “**Outstanding.**”

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

Performance Levels	Commerce Bank, NA Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The overall distribution of loans to borrowers of different income levels and businesses of different sizes is excellent. The performance for loans to businesses with revenues of \$1 million or less is excellent. The distribution of home mortgage loans is excellent.
- The overall geographic distribution of loans is good. Lending opportunities are limited in low-income areas.
- Excellent levels of community development lending had a positive impact on the Lending Test rating.
- The quality and impact of community development investments and donations are excellent. Current and prior period investments assisted in addressing community development needs throughout all Assessment Areas (AA).
- Commerce’s service delivery systems provide good access to low-and moderate-income geographies and individuals. CD services activities are good. Bank personnel provided their financial expertise through participation in community development services in each rated AA.

Definitions and Common Abbreviations

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

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

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

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low- or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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 householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for pre-approval and loans for manufactured housing.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If

an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

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

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

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

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

Description of Institution

Commerce Bank, National Association (Commerce) is a full service \$17.5 billion interstate financial institution. Commerce is a wholly owned subsidiary of Commerce Bancshares, Inc. (CBI). Both have their headquarters in Kansas City, Missouri. Capital for Business, Inc., (CFB) is a venture capital firm operating as a subsidiary of CBI. CFB owns three Small Business Investment Companies (SBIC) that partner with other investors to help businesses that meet the SBA criteria to expand and pay operating expenses. In 2007, Commerce Mortgage Corporation (CMC) became a wholly owned subsidiary of Commerce. CMC is a mortgage loan originator and service provider. Loans originated by these affiliates are included in our analysis of the banks CRA performance.

Commerce's corporate strategy is focused on business development while offering a wide variety of commercial and retail products and services. Other significant business lines include investment and cash management services, trust services for individuals and corporations, and correspondent banking activities. The bank also offers home mortgage loans. The majority of these loans are sold into the secondary market. Total loans represent 63.3 percent of total assets as of June 30, 2009. The bank shows \$11.1 billion in total loans compared to \$13.7 billion in deposits and a loan-to-deposit ratio of 81 percent. The loan portfolio (by dollar volume) is comprised of 29 percent commercial, 25 percent commercial real estate, 24 percent consumer, and 20 percent one-to-four family residential, and 2 percent agriculture-related loans. Tier 1 capital is \$1.4 billion.

During the evaluation period, several mergers and acquisitions occurred expanding the bank's market areas. In 2006, the bank purchased West Pointe Bancorp, Inc. in Belleville, Illinois. This purchase included four branches that expanded the bank's presence in the Counties of Madison and Monroe in the St. Louis MO-IL Multistate Metropolitan Illinois AA. In 2007, the bank acquired the South Tulsa Financial Corporation (South Tulsa) in Tulsa Oklahoma that included two branches located in the southern portion of Tulsa Oklahoma and purchased the Denver Aurora Colorado branch from Commerce Bank, N.A. Denver. This activity expanded the bank's presence into the States of Colorado and Oklahoma. In 2008, Commerce Bank, N.A. Wichita was merged into Commerce Bank N.A. expanding its presence in the State of Kansas with thirty-seven branch locations in the state.

The bank operates 214 banking offices throughout 27 AA in five states – Missouri, Kansas, Illinois, Colorado, and Oklahoma. The AAs consist of two multistate metropolitan areas, which includes Kansas City and St. Louis; twelve other metropolitan areas located in Denver/Aurora in Colorado; Bloomington in Champaign and Peoria in Illinois; Lawrence and Wichita in Kansas; California/Tipton, Columbia, Joplin, Springfield and St. Joseph in Missouri; Tulsa in Oklahoma; and thirteen other non-metropolitan areas in Missouri and Kansas. Approximately 62 percent of the bank's deposits, 40 percent of loans (by number), and 42 percent of loans (by dollar volume) were attributed to locations in the metropolitan areas of Kansas City and St. Louis, Missouri.

There are no legal or financial constraints that impede the bank's ability to help meet the credit needs in its AAs. Commerce received an "Outstanding" rating at the conclusion of the last CRA examination dated April 4, 2005.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for all three tests (Lending, Investment, and Services) is January 1, 2005, through December 31, 2008. The investment and services evaluation period is the same as lending in response to the bank's preference to have all three tests with the same evaluation period. Products reviewed in the Lending Test include home mortgage loans, small loans to businesses, and small loans to farms. We used the most recent data available (2007 peer lending) for home mortgages and small loans to businesses and farms to compare Commerce's lending performance to other reporting lenders in the AAs.

Our lending analysis for all AAs does not include multifamily home mortgage loans due to the low volume of loans for this product. The lending analysis also does not include small loans to farms for the St. Louis, Lawrence, Champaign, Tulsa, and Denver MAs due to the low volume of loans for this product. The number of reported loans for these products in the stated AAs is insufficient to conduct a meaningful lending analysis. We also considered that for some loan products, the opportunities to lend in low-income geographies were limited due to the minimum volume of owner occupied housing units. In these instances, lending performance in moderate-income geographies was given the greatest weight. Another impact on home mortgage lending activity was Fannie Mae and Freddie Mac eliminating their 100 percent loan to value lending. Additionally, most current government loan programs will not allow the use of grant funds for down payment.

An analysis of market share was not conducted for loan products where the bank had a minimal market share since it is less meaningful. At the bank's request, we considered qualified investments made by affiliates. The standardized tables for each test are shown in Appendix D. We used deposit information, annually reported to the Federal Deposit Insurance Corporation (FDIC) to determine the bank's deposit market share and market presences with in its AAs. The most recent deposit information available is as of June 30, 2009.

Data Integrity

We performed annual data integrity reviews to assess the accuracy of home mortgage and CRA (small business) data on an ongoing basis. Our findings are that the data is accurate and reliable for use in this evaluation. We evaluated community development (CD) loan, investment, and service information during the examination (exam). This evaluation only includes an assessment of qualified CD activities.

Selection of Areas for Full-Scope Review

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

Rating

The bank's overall rating is a blend of the state and the multistate metropolitan area (MA) ratings. The St. Louis, MO-IL MA (St. Louis MA) received the most weight followed by the Kansas City, KS-MO MA (Kansas City MA), and the State of Missouri. The multistate MAs received more weight than the State of Missouri due to volume of loans, deposits, and branches in each AA. Additionally, management considers the St. Louis and Kansas City AAs key markets in terms of the bank's overall operations with its headquarters located in Kansas City, Missouri.

The St. Louis MA represents 32 percent of total deposits and 25 percent of loan originations by dollar amount. The Kansas City MA and the State of Missouri represent 31 percent and 19 percent of deposits, respectively. For loan originations they represent 18 percent and 33 percent, respectively.

The remaining order for full-scope AA is as follows: the State of Kansas followed by the State of Illinois. The states of Oklahoma and Colorado received the least weight in our analysis. Both have loan and deposit percentages at less than 1.5 percent.

Commerce also has five limited-scope AAs in Missouri; two limited-scope AAs in Kansas, and two limited-scope AAs in Illinois. The multistate MAs and state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each state rating for details regarding how the areas were weighted in arriving at the overall state rating.

Fair Lending or Other Illegal Practices Review

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

Multistate Metropolitan Area Rating

St. Louis Multistate Metropolitan Area

CRA rating for the St. Louis MO-IL MA: Outstanding¹

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The overall distribution of loans to borrowers of different income levels and businesses of different sizes is excellent. The performance for loans to businesses with revenues of \$1 million or less is excellent. The distribution of home mortgage loans is excellent. The distribution of home refinance, home improvement, and home purchase loans to moderate-income borrowers exceeds demographics. The distribution of these loans to low-income borrowers is excellent considering the percentage of families below the poverty level.
- The overall geographic distribution of loans is adequate. Penetration in low- and moderate-income (LMI) areas is adequate for small business and home purchase loans. For refinance and home improvement loans, penetration in moderate-income geographies is adequate and good, respectively. Lending opportunities are limited in low-income areas with three percent owner-occupied units.
- The level of CD lending is excellent, which positively impacted the Lending Test rating.
- Commerce's flexible loan programs provide increased opportunities for LMI individuals and geographies.
- The level of qualified investments is high and demonstrates an excellent level of responsiveness to the AA's community development needs.
- Branch distribution is adequate, to provide reasonable access to banking services in LMI geographies and to individuals of different income levels. Bank personnel provided a good level of community development services during this evaluation period.

¹ 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.

Description of Institution's Operations in the St. Louis MO-IL MA

Commerce operates 55 branches and 111 ATMs in the St. Louis MA, which includes counties in both the state of Missouri and Illinois. A majority of branches in the MA are located in St. Louis County Missouri. Thirty-two percent of total bank deposits and 25 percent of total reported loans (by dollar) are in the MA.

Commerce ranked fourth in deposit market share with 6.37 percent of all deposits reported by financial institutions in the St. Louis MA. Major competitors are Bank of America (11.17 percent deposit market share) and Southwest Bank, an M&I Bank (7.83 percent deposit market share).

We reviewed two recent community contacts conducted in the AA within the last 12 months. The community contacts identified a lack of branches in LMI neighborhoods, the need for increased business lending, and an opportunity for below market financing for rental housing.

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

Scope of Evaluation in St. Louis MO-IL MA

Commerce has one assessment area (AA) in the St. Louis MO-IL MSA (St. Louis MA). The multistate metropolitan area rating was based on a full-scope review of this area. Please refer to the table in Appendix A for more information.

To arrive at overall conclusions, we placed more weight on small loans to businesses followed by home mortgage loans. Small loans to businesses and home mortgage loans represent 65 percent and 34 percent of total reported loans, respectively. Within the home mortgage loan category, refinance loans are the primary product followed by home improvement loans.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the St. Louis MA is rated "Outstanding."

Lending Activity

Refer to Table 1 Lending Volume in the "Multistate Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect excellent responsiveness in relation to area credit needs and the bank's deposit market share. Commerce has a deposit market share of 7.56 percent, which ranks fourth in the St. Louis MA.

Small business loan activity in the St. Louis MA is excellent. Commerce has a 9.06 percent market share (by dollar volume), which ranks eighth. Top competitors include large savings banks and finance companies.

Home mortgage loan activity in the St. Louis MA is adequate. For home improvement loans, the market share rank is eleventh. Market share for home refinance and home purchase loans is not significant at less than one percent. Competition for these loans is strong with the top ten lenders, including nationwide mortgage companies and savings banks, having less than nine percent of the overall market share.

Distribution of Loans by Income Level of the Geography

Commerce's geographic distribution of lending in the St. Louis MA is adequate.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the St. Louis MA 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.

Commerce's geographic distribution of home mortgage loans is adequate. A market share analysis was not included in the lending evaluation for this product.

The overall geographic distribution of home refinance and home purchase loans is adequate. For refinance loans, penetration in moderate-income geographies is adequate. Penetration in low-income geographies is poor; however, lending opportunities are limited with only three percent of owner-occupied housing in these geographies. For home purchase loans, penetration in LMI geographies is adequate.

The overall geographic distribution of home improvement loans is good. Penetration in moderate-income geographies, including market share, is good. Penetration in low-income geographies is adequate. The bank's performance is slightly below area demographic data.

Small Loans to Businesses

Refer to Table 6 in the St. Louis MA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is adequate. Penetration in LMI geographies is adequate. Market share in these geographies is good.

Lending Gap Analysis

Our geographic distribution analysis included a review for lending gaps, particularly in LMI areas. We did not identify any conspicuous lending gaps in the St. Louis MA AA.

Inside/Outside Ratio

We performed an analysis of this ratio at the bank level. A majority of the bank's loans, by number, 84 percent, are inside its AA. This positively impacts the bank's Lending Test performance.

Eighty-three percent of small business loans are inside the bank's AA. The number of home purchase, home improvement, and refinance loans within the AA is 87 percent, 93 percent, and 91 percent, respectively. This information only includes bank originations and purchases. Extensions of credit by affiliates are not included.

Distribution of Loans by Income Level of the Borrower

Commerce's distribution of loans to borrowers of different income levels and businesses of different sizes is excellent.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the St. Louis MA 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.

Commerce's distribution of home mortgage loans to borrowers of different income levels is excellent. A market share analysis was not included in this lending evaluation. The percentage of families below the poverty level is 7.64 percent.

The distribution of home refinance, home improvement, and home purchase loans to moderate-income borrowers exceeds demographics. The distribution of these loans to low-income borrowers is excellent considering the percentage of families below the poverty level. For home improvement loans, the market share of loans to LMI borrowers exceeds the overall market share.

Small Loans to Businesses

Refer to Table 11 in the St. Louis MA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The distribution of loans to businesses of different sizes is excellent. The percentage of loans to businesses with revenues of \$1 million or less is substantially near area demographic data. The market share for these loans exceeds the overall market share.

Community Development Lending

Refer to Table 1 Lending Volume in the St. Louis MA 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 multi-family

loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

Community Development (CD) lending performance is excellent. During the evaluation period, Commerce originated 44 loans totaling \$65 million in the St. Louis MA. This level of CD lending had a positive impact on the Lending Test rating.

Sixteen loans totaling \$59 million were to help promote economic development by financing small businesses. Over 90 percent of these loans helped retain jobs in LMI tracts. Eighteen loans totaling \$3.5 million provided community services targeted to LMI individuals. Services include providing health care to under-insured residents and underserved low-income families. Ten loans totaling \$2.7 million were to organizations that provide affordable housing.

Product Innovation and Flexibility

Commerce participates in flexible loan programs to address the credit needs of LMI individuals and in LMI geographies. The bank also participates in loan programs that assist small businesses and small farms. These programs help to provide jobs for LMI individuals. These programs had a positive impact on the bank's Lending Test rating.

Commerce, through its mortgage company subsidiary, offers a closing cost program to provide up to \$1,500 in assistance to borrowers that meet income requirements. This funding assistance is only available for home purchase loans in LMI geographies. During the evaluation period, Commerce provided assistance through this program to 17 participants with properties located in LMI tracts throughout all AAs. The total for the home purchase loans was \$1,277,989.

In addition, Commerce participates in the following loan programs:

- Missouri / Illinois First Linked Deposit Business Loan Program, which links state funds deposited in the lending institution to reduce interest rates to borrowers. The program was established to provide financing for small businesses creating jobs. The program also helps create and retain jobs in depressed rural and LMI areas. Business must be for profit and have less than 25 employees. In Missouri and Illinois, the bank has 93 and 13 notes outstanding, respectively.
- Missouri Agriculture and Small Business Development Beginning Farmer Loan Program, which is available to first-time (start-up) farmers that have not had farm income within the last five years, and the applicant has not owned acreage in excess of 50 percent of the average size farm in the county in which they intend to farm or have not owned farmland with an appraised value over \$450 thousand. The loan limit is \$369 thousand with funding limited to operating expenses for this program. Eligible businesses have one to ten employees.
- Futures Vehicle Financing Program, which is offered in conjunction with the Missouri Division of Family Services for clients participating in the Missouri Welfare Reform FUTURES program. The participants are LMI with income below the poverty level who do not qualify for standard vehicle financing options.

Commerce was unable to provide information regarding the total number and/or dollar volume of these loans originated in the AA during the evaluation period.

INVESTMENT TEST

The bank's performance under the Investment Test is rated "Outstanding." Refer to Table 14 in the St. Louis MA section of Appendix D for the facts and data used to evaluate the bank's level of qualified community development investments. Refer to the St. Louis MA section in Appendix C for details regarding qualified investment opportunities.

Commerce and its investment affiliate demonstrated an excellent level of responsiveness in meeting the AA's community development investment needs with \$47.3 million in equity investments and donations. Qualified investments for the AA represent 35 percent of total CRA investments for the bank and 32 percent of bank deposits.

The investments primarily consist of tax credits totaling \$39.5 million, other equity investments totaling \$5.4 million, and donations totaling \$2.3 million. The total includes \$2.2 million in prior period investments primarily consisting of a St. Louis Equity Fund investment. A majority of the tax credits helped to revitalize and stabilize LMI geographies by providing funding for the rehabilitation and/or redevelopment of eligible commercial, multi-family, and single family residential properties that meet the city and county's economic and job development plans for the area. The equity investments primarily consisted of issuances that support affordable housing for LMI individuals and funding for small businesses to pay for expansion and operating expenses. The charitable donations primarily provided financial assistance to various local organizations that offer targeted community services for LMI individuals and nonprofit organizations that has programs to support permanent job creation by providing financing for eligible small businesses.

SERVICE TEST

The bank's performance under the Service Test is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance is adequate in the St. Louis MA. Refer to Table 15 in the Multistate Metropolitan Areas section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Retail Banking Services

Branch distribution is adequate, providing reasonable access to banking services in LMI geographies and to individuals of different income levels. The percentage of branches and ATMs in moderate-income tracts is near the percentage of the population residing in those tracts. There are no branches in the low-income tracts. Commerce, however, has three ATMs within business establishments in three of the low-income tracts to assist with providing services to LMI individuals. Branch opening and closings did not adversely affect the accessibility of Commerce's delivery systems to LMI areas.

The hours of operation are excellent and allow convenient access to all residents. Hours at branches in the LMI tracts are comparable to those at other locations. All offices offer daily, extended afternoon hours for the lobby and drive-up. Products and services offered at the various bank locations do not vary substantially.

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

Other alternative delivery systems offered by Commerce 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 apply for several types of loans (personal, home equity, mortgage and school, etc) 24 hours per day, seven days per week through the bank's Internet site. Bill payment is offered on most accounts for free. Commerce also offers telephone banking service that allows 24-hour access to accounts.
- Bank by Mail: Allows customers to mail deposits, payments and messages to the bank.

The bank does not maintain information to demonstrate the effectiveness or impact of alternative delivery systems in LMI geographies or use of these systems by LMI individuals. Therefore, these services did not impact the Service Test rating for the St. Louis MA.

Community Development Services

Commerce provided a good level of community development services in the St. Louis MA. Commerce bank staff provided their financial expertise to 61 different organizations that promote community development initiatives in the MA. The majority of the organizations provide community services to LMI individuals, such as programs for youth, senior citizens, and the disabled. Financial education training targeted to LMI individuals is also provided. In the St Louis MA, affordable housing received a significant amount of assistance by bank personnel. Ensuring that housing is affordable in the LMI tracts is a big priority in the area. Other community development services provided by bank staff were to organizations that helped revitalize and stabilize LMI geographies.

The bank participates in the Missouri Quest program. This program allows welfare recipients to access their assistance payments via ATM debit cards supplied and serviced by Commerce. During tax season the bank's website offers free online tax preparation and electronic filing of state and federal returns for LMI individuals. The bank also offers free checking, which increases the access of financial services to LMI individuals.

Multistate Metropolitan Area Rating

Kansas City KS-MO Metropolitan Area

CRA rating for the Kansas City KS-MO MA: Outstanding²

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The overall distribution of loans to borrowers of different income levels and businesses of different sizes is excellent. The performance for loans to businesses and farms with revenues of \$1 million or less is excellent. The distribution of home mortgage loans is excellent. The distribution of home refinance, home improvement, and home purchase loans to moderate-income borrowers exceeds demographics. The distribution of these loans to low-income borrowers is good considering the percentage of families below the poverty level.
- The overall geographic distribution of loans is good. Penetration in moderate-income areas is good for small business and home improvement loans. In low-income areas, penetration of these loans is adequate. The market share of small business loans in low-income tracts is over 90 percent of the overall market share and exceeds the overall market share in moderate-income tracts. For refinance and home purchase loans, penetration in moderate-income geographies is adequate. Lending opportunities for home mortgage loans are limited in low-income areas with three percent owner-occupied units.
- The level of CD lending is excellent, which positively impacted the Lending Test rating.
- Commerce's flexible loan programs provide increased opportunities for LMI individuals and geographies.
- The level of qualified investments is high and demonstrates an excellent level of responsiveness to the AA's community development needs.
- Branch distribution is excellent, providing access to banking services in LMI geographies and to individuals of different income levels. Bank personnel provided a good level of community development services during this evaluation period.

² 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.

Description of Institution's Operations in the Kansas City MA

Commerce Operates 50 branches and 119 ATMs in the Kansas City MA, which includes counties in the States of Kansas and Missouri. A majority of branches in the MA are located in Jackson County, Missouri and Johnson County, Kansas. Thirty-one percent of total bank deposits and 17 percent of total reported loans (by number) are in this MA.

Commerce ranked first in deposit market share with an 11.07 percent of all deposits reported by financial institutions in the Kansas City MA. Major competitors are Bank of America (9.31 percent deposit market share) and UMB Bank (9.96 percent deposit market share).

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

Scope of Evaluation in Kansas City KS-MO MA

Commerce has one assessment area (AA) in the Kansas City KS-MO MA (Kansas City MA). The multistate metropolitan area rating was based on a full-scope review of this area. Please refer to the table in Appendix A for more information.

To arrive at overall conclusions, we placed more weight on small loans to businesses followed by home mortgage loans and small loans to farms. The loans represent 64, 33, and 2 percent of total reported loans, respectively. Within the home mortgage loan category, refinance loans are the primary product followed by home improvement loans.

LENDING TEST

The bank's performance under the Lending Test in the Kansas City MA is rated "Outstanding."

Lending Activity

Refer to Table 1 Lending Volume in the "Multistate Metropolitan Area(s)" 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. Commerce has a deposit market share of 10.22 percent, which ranks second in the Kansas City MA.

Small business loan activity in the Kansas City MA is adequate. Commerce has a 6.76 percent market share (by dollar volume), which ranks ninth. Top competitors include large nationwide financial institutions and savings banks, and finance companies.

Home mortgage loan activity is adequate. Home improvement loans are ranked fifth. The market for refinance and home purchase loan activity is not significant at less than one percent. Competition for these loans is strong with the top ten lenders, including nationwide

banks, mortgage companies and finance companies, having less than nine percent of the overall market share.

Small farm loan activity is good. Commerce originated 200 loans during the evaluation period totaling \$9.9 million, which ranked second in the market.

Distribution of Loans by Income Level of the Geography

Commerce's geographic distribution of lending in the Kansas City MA is good.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the Kansas City MA 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.

Commerce's geographic distribution of home mortgage loans is adequate. A market share analysis was not included in the lending evaluation for this product.

The overall geographic distribution of refinance and home purchase loans is adequate. For refinance loans, penetration in LMI tracts is adequate. For home purchase loans, penetration in moderate-income tracts is adequate. Penetration in low-income tracts is poor; however, lending opportunities are limited with only three percent of owner-occupied housing in these geographies.

The overall geographic distribution of home improvement loans is good. Penetration in moderate-income tracts, including market share, is good. Penetration in low-income tracts, including market share, is adequate.

Small Loans to Businesses

Refer to Table 6 in the Kansas City MA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is good. Performance in moderate-income tracts is good. Market share exceeds the overall market share in these geographies. Performance in low-income geographies is adequate. Market share is near demographic data in these geographies.

Small Loans to Farms

Refer to Table 7 in the Kansas City MA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The geographic distribution of small loans to farms is adequate. The bank's percentage of loans in LMI geographies is below area demographics data. There are however limited lending opportunities in the low-income geographies with only 1.82 percent of the farms

located in the tracts. The bank's percentage of loans in middle-income geographies exceeds area demographic which is where the majority of farms are located. The bank's market share percentage is below area demographic data for low and moderate-income tracts and above area demographics for the middle-income tracts. By loan volume small farm loans represent two percent by number and one percent by dollar of total loan originations by Commerce during the evaluation period. Small farm loans are not a primary credit need for the Kansas City MA.

Lending Gap Analysis

Our geographic distribution analysis included a review for lending gaps, particularly in LMI areas. We did not identify any conspicuous lending gaps in the Kansas City MA.

Inside/Outside Ratio

We performed an analysis of this ratio at the bank level. Refer to this section under the St. Louis MA portion of this Performance Evaluation for details.

Distribution of Loans by Income Level of the Borrower

Commerce's distribution of loans to borrowers of different income levels and businesses of different sizes is excellent.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Kansas City MA 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.

Commerce's distribution of home mortgage loans to borrowers of different income levels is excellent. A market share analysis was not included in this lending evaluation. The percentage of families below poverty level is 6.14 percent.

The distribution of home refinance, home improvement, and home purchase loans to moderate-income borrowers exceeds demographics. The distribution of these loans to low-income borrowers is good considering the percentage of families below the poverty level. For home improvement loans, the market share of loans to LMI borrowers is near demographic data.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes is excellent. The percentage of loans to businesses with revenues of \$1 million or less is near area demographics. The bank's market share significantly exceeds the overall market share.

Small Loans to Farms

Refer to Table 12 in the Kansas City MA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations/purchase of small loans to farms.

The distribution of loans to farms of different sizes is excellent. The percentage of loans to farms with revenues of \$1 million or less is near area demographics. The bank's market share significantly exceeds the overall market share.

Community Development Lending

Refer to Table 1 Lending Volume in the "Multistate Metropolitan Area(s)" 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 multi-family loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

Community Development (CD) lending performance is excellent. During the evaluation period, Commerce originated 70 loans totaling \$175 million in the Kansas City MA. This level of CD lending had a positive impact on the Lending Test rating.

Fifty loans totaling \$162 million were to help promote economic development by financing small businesses. Over 90 percent of these loans helped retain jobs in LMI tracts. Fourteen loans totaling \$9 million provided community services targeted to LMI individuals. Services include providing food, clothing, shelter, and employment services. Four loans totaling \$4 million were part of the City of Kansas City Plan to revitalize LMI tracts in the AA. These loans helped retain significant employment to LMI individuals and construct residential real estate. Two loans totaling \$178 thousand were to organizations that provide affordable housing.

Product Innovation and Flexibility

Commerce participates in flexible loan programs to address the credit needs of LMI individuals and in LMI geographies. The bank also participates in loan programs that assist small businesses and small farms. These programs help to provide jobs for LMI individuals. These programs had a positive impact on the bank's Lending Test rating.

Commerce, through its mortgage company subsidiary, offers a closing cost program to provide up to \$1,500 in assistance to borrowers that meet income requirements. This funding assistance is only available for home purchase loans in LMI geographies. During the evaluation period, Commerce provided assistance through this program to 17 participants with properties located in LMI tracts throughout all AAs. The total for the home purchase loans was \$1,277,989.

In addition, Commerce participates in the following loan programs:

- Missouri First Linked Deposit Business Loan Program, which links state funds deposited in the lending institution to reduce interest rates to borrowers. The program was established to provide financing for small businesses creating jobs in Missouri. The program also helps create and retain jobs in depressed rural or urban areas which benefits LMI individuals. Business must be for profit and have less than 25 employees. In Missouri, the bank has 74 customers participating in the program with 93 notes outstanding.
- Missouri Agriculture and Small Business Development Beginning Farmer Loan Program, which is available to first-time farmers with start up operations to finance the purchase of farmland, facilities, machinery, and breeding livestock.
- Futures Vehicle Financing Program, which is offered in conjunction with the Missouri Division of Family Services for clients participating in the Missouri Welfare Reform FUTURES program. This program allows very low-income participants to obtain funding for vehicles that do not qualify for traditional financing.
- Community Housing Investment Partnership (CHIP) Program, which provides second mortgage financing for first time homebuyers with income below 80 percent of the area median family income. It is available in targeted LMI areas in Kansas City, Kansas.

Commerce was unable to provide information regarding the total number and/or dollar volume of these loans originated in the AA during the evaluation period.

INVESTMENT TEST

The bank's performance under the Investment Test is rated "Outstanding." Refer to Table 14 in the Kansas City MA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments. Refer to the Kansas City MA section in Appendix C for details regarding qualified investment opportunities.

Commerce and its investment affiliates demonstrated an excellent level of responsiveness in meeting the AA's community development investment needs with \$59.7 million in equity investments and donations. This total includes prior period investments totaling \$2 million in equity funds. Qualified investments for the AA represent 44 percent of total CRA investments for the bank and 31 percent of bank deposits.

The investments primarily consist of tax credits totaling \$55.8 million, equity investments totaling \$2.5 million, and donations totaling \$1.3 million. A majority of the tax credits helped to revitalize and stabilize LMI geographies by providing funding for the rehabilitation and/or redevelopment of eligible commercial, multi-family, and single family residential properties that meet the city's economic development plans for the area. The equity investments primarily consist of issuances that support affordable housing for LMI individuals and funding for small businesses to pay expansion and operating expenses. The charitable donations primarily provided financial assistance to various local organizations that offer targeted community

services for LMI individuals and nonprofit organizations that has programs to support permanent job creation by providing financing for eligible small businesses.

SERVICE TEST

The bank's performance under the Service Test is rated "Outstanding." to Table 15 in the Kansas City 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

The Branch distribution is excellent, providing access to banking services in LMI geographies and to individuals of different income levels. The bank's offices and ATMs located in middle and upper income tracts are within one mile of the LMI tracts, which help provide access to residents in adjoining LMI tracts. Of the 39 branches in middle- and upper-income tracts, 14 are adjacent or near low-income tracts and 16 are adjacent or near moderate-income tracts. Of the 91 ATMs in middle- or upper-income tracts, 26 are adjacent or near low-income tracts and 39 are adjacent or near moderate-income. All are full-service ATMs. The bank also has 28 cash dispensing ATMs of which 24 are located near full-service ATMs or are located in the branch facility. The four stand alone cash dispensing ATMs are located two hospitals and two retail outlets. The ATMs were placed in these locations to assist with customers' cash needs. The bank also has branches and ATMs in the four non-income designation census tracts.

Branch opening and closings did not adversely affect the accessibility of Commerce's delivery systems to LMI areas. During the evaluation period, Commerce did not open or close branches in LMI census tracts.

Commerce provides brochures in Spanish for customers where English is a 2nd language. This assists them in the understanding of what types of accounts, loans, and other products and services the bank has to offer.

The bank does not maintain information to demonstrate the effectiveness or impact of the alternative delivery systems in LMI geographies or use of these systems by LMI individuals. Therefore, these services did not impact the Service Test rating for the Kansas City MA.

Refer to the Service Test comment for the St. Louis MA in this PE for details on other alternative delivery systems offered by Commerce.

Community Development Services

Commerce provided a good level of community development services in the Kansas City MA. Commerce bank staff provided their financial expertise to 64 different organizations that promote community development initiatives in the MA. Over half of the organizations provide community services to LMI 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 LMI geographies and provide affordable housing.

Commerce offers Electronic Transfer Accounts to individuals who receive periodic payments from state government. These accounts support the government's initiative to improve access to financial services and encourage LMI individuals to establish accounts to receive their payments. Commerce also participates in the Kansas Vision Program and Missouri Quest Program in which electronic cards are used to distribute benefits to persons without direct deposit accounts. Recipients can access their benefits through Commerce's ATMs.

Commerce provides low-cost accounts to non-profit organizations and community groups. These organizations primarily serve LMI individuals and help revitalize and stabilize LMI geographies.

State Rating

State of Missouri

CRA Rating for Missouri: Outstanding³

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The overall distribution of loans to borrowers of different income levels and businesses of different sizes is excellent. The distribution of small loans to businesses and farms is excellent. For home purchase, home improvement and refinance loans, performance to low-income borrowers is excellent considering the percentage of families below the poverty level. For refinance loans, performance to moderate-income borrowers is good. Performance to moderate-income borrowers is excellent for both home purchase and home improvement loans.
- The overall geographic distribution of loans is good. The distribution of small loans to businesses and farms is good. The geographic distribution of home refinance loans is good. The distribution of home purchase loans is adequate. The geographic distribution of home improvement loans is excellent.
- The level of CD lending is excellent which positively impacted the Lending Test rating.
- Lending levels are excellent. Small business and small farm loan activity is excellent. Home mortgage loan activity is adequate.
- The level of qualified investments to meet community development needs is excellent.
- Branch distribution is excellent. Service delivery systems are accessible to geographies and individuals of different income levels in the full-scope assessment area. Stronger performance in four of the limited-scope assessment areas, representing 62 percent of the deposits in the state had a positive impact on the Service Test rating. Bank personnel provided an excellent level of community development services during this evaluation period.

³ 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.

Description of Institution's Operations in Missouri

Commerce operates 54 branches and 88 ATMs within its AAs in the State of Missouri. This excludes the Missouri portion of the Kansas City and St. Louis MAs that are presented separately in this evaluation. The Missouri AAs include five metropolitan areas: California/Tipton, Columbia, Joplin, Springfield, and St. Joseph. In addition, there are eight non-metropolitan areas: Barry County, Branson, Cape Girardeau, Hannibal, Lebanon, Mexico/Moberly, Poplar Bluff, and St. Francois. Nineteen percent of the bank's total deposits and 39 percent of total reported loans (by number) are attributed in these AAs.

Commerce ranked third in deposit market share with a 10.42 percent of all deposits reported by FDIC-insured institutions operating in Missouri, including the Missouri portions of the Kansas City and St. Louis MA. Major competitors are U.S. Bank, NA (14.63 percent deposit market share), and Bank of America, N.A. (11.21 percent deposit market share)

Refer to the market profiles for the State of Missouri Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Missouri

We evaluated the bank's performance in the State of Missouri by performing a full-scope review of the Springfield MA. This AA has the largest percentage of deposits and loans in Missouri (excluding the St. Louis MA and Kansas City MA). We performed limited scope reviews for the metropolitan areas of St. Joseph, Columbia, Joplin, and California-Tipton. We also performed a limited scope review in the eight non-metropolitan areas, which were combined for analysis purposes. Refer to Appendix A for more information.

To arrive at overall conclusions in the full-scope review, we placed more weight on small loans to businesses followed by home mortgage loans. Small loans to businesses and home mortgage loans represent 46 percent and 31 percent of total reported loans, respectively. Within the home mortgage loan category, refinance loans are the primary product followed by home purchase loans. Small farm loans are 22 percent of total reported loans.

LENDING TEST

The bank's performance under the Lending Test in the State of Missouri is rated "Outstanding."

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Springfield MA is excellent.

Lending Activity

Refer to Table 1 Lending Volume for the Springfield MA in the state of Missouri section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect excellent responsiveness in relation to area credit needs and the bank's deposit market share. Commerce has a deposit market share of 10.95 percent, which ranks second in the Springfield MA.

Home mortgage loan activity is adequate. Home improvement loans are ranked second. The market share for refinance and home purchase loan activity is not significant at less than two percent. Competition for these loans is strong with the top ten lenders, including nationwide banks, mortgage companies and finance companies, having less than eight percent of the overall market share.

Small farm loan activity is excellent. Commerce is ranked first in the market.

Distribution of Loans by Income Level of the Geography

Commerce's geographic distribution of lending in the Springfield MA is excellent.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 for the Springfield MA 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/purchases.

Commerce's geographic distribution of home mortgage loans is excellent.

The geographic distribution of home refinance loans is excellent. The percentage of loans in moderate-income geographies is excellent. Market share in these tracts exceeds the overall market share. The distribution of home purchase loans is good. The percentage of loans in moderate-income geographies is good. The geographic distribution of home improvement loans is excellent as the percentage of bank loans in moderate-income tracts exceeds demographics. Market share in these tracts exceeds the overall market share.

Small Loans to Businesses

Refer to Table 6 for the Springfield MA in the state of Missouri section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is excellent. Performance in low-income tracts is excellent. The percentage of bank loans in these geographies is substantially near area demographics. The market share exceeds the overall market share. Performance in moderate-income tracts is good. The percentage of bank loans in these geographies is only slightly below area demographics data. The market share substantially meets the overall market share.

Small Loans to Farms

Refer to Table 7 for the Springfield MA in the state of Missouri section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The geographic distribution of small loans to farms is adequate. Performance in moderate-income geographies is adequate. The percentage of bank loans in these geographies is slightly below area demographic data. The market share exceeds the overall market share.

Lending Gap Analysis

Our geographic distribution analysis included a review for lending gaps, particularly in LMI areas. We did not identify any conspicuous lending gaps in the Springfield MA AA.

Inside/Outside Ratio

We performed an analysis of this ratio at the bank level. Refer to this section under the St. Louis MA portion of this Performance Evaluation for details.

Distribution of Loans by Income Level of the Borrower

Commerce's distribution of loans to borrowers of different income levels and businesses of different sizes is excellent.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 for the Springfield MA 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.

Commerce's distribution of home mortgage loans to borrowers of different income levels is excellent.

The overall distribution of refinance loans to borrowers of different income levels is good.. Performance to low-income borrowers is excellent considering the percentage of families below the poverty level. The percentage of families below the poverty level is 8.12 percent.

The market share of loans to these borrowers exceeds the overall market share. Performance to moderate-income borrowers is good. The bank's performance for this income level is slightly below area demographic data. Market share is adequate.

The distribution of home purchase and home improvement loans to borrowers of different income levels is excellent. For both loan products, performance to low-income borrowers is excellent considering the percentage of families below the poverty level. Performance to moderate-income borrowers exceeds demographics for both home purchase and home improvement loans. The market share of home improvement loans to LMI borrowers exceeds the overall market share.

Small Loans to Businesses

Refer to Table 11 for the Springfield MA 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 businesses with revenues of \$1 million or less exceeds demographics. The market share of these loans exceeds the overall market share.

Small Loans to Farms

Refer to Table 12 for the Springfield MA 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/purchase of small loans to businesses.

The distribution of loans to farms of different sizes is excellent. The percentage of loans to farms with revenues of \$1 million or less exceeds area demographic data. The market share of these loans exceeds the overall market share.

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 CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

Community Development lending performance is excellent. During the evaluation period, Commerce originated 31 CD loans totaling \$49 million in the Springfield MA. This level of CD lending had a positive impact on the Lending Test rating.

Twelve loans totaling \$37 million were to help promote economic development by financing small businesses. Over 90 percent of these loans helped retain jobs in LMI tracts. Eighteen loans totaling \$10 million provided community services targeted to LMI individuals. Services include providing food, clothing, medical aid, employment and educational assistance. Funds also helped provide emergency shelter for abused and neglected children. One loan totaling \$2 million was to an organization that provides affordable housing.

Product Innovation and Flexibility

Commerce participates in flexible loan programs to address the credit needs of LMI individuals and in LMI geographies. The bank also participates in loan programs that assist small businesses and small farms. These programs help to provide jobs for LMI individuals. These programs had a positive impact on the bank's Lending Test rating.

Commerce, through its mortgage company subsidiary, offers a closing cost program to provide up to \$1,500 in assistance to borrowers that meet income requirements. This funding

assistance is only available for home purchase loans in LMI geographies. During the evaluation period, Commerce provided assistance through this program to 17 participants with properties located in LMI tracts throughout all AAs. The total for the home purchase loans was \$1,277,989.

In addition, Commerce participates in the following loan programs:

- Missouri First Linked Deposit Business Loan Program, which links state funds deposited in the lending institution to reduce interest rates to borrowers. The program was established to provide financing for small businesses creating jobs in Missouri. The program also helps create and retain jobs in depressed rural or urban areas which benefits LMI individuals. Business must be for profit and have less than 25 employees. In Missouri, the bank has 74 customers participating in the program with 93 notes outstanding.
- Missouri Agriculture and Small Business Development Beginning Farmer Loan Program, which is available to first-time farmers with start up operations to finance the purchase of farmland, facilities, machinery, and breeding livestock.
- Futures Vehicle Financing Program, which is offered in conjunction with the Missouri Division of Family Services for clients participating in the Missouri Welfare Reform FUTURES program. This program allows very low-income participants to obtain funding for vehicles that do not qualify for traditional financing.

Commerce was unable to provide information regarding the total number and/or dollar volume of these loans originated in the AA during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in Joplin MA, California-Tipton MA and the nonMA MO AAs is not inconsistent with the bank's overall "Outstanding" performance under the Lending Test for the state of Missouri. The bank's performance in the St. Joseph MA and Columbia MA are weaker but considered good.

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

The bank's performance under the Investment Test in Missouri is rated "Outstanding."

Commerce and its investment affiliates demonstrated an excellent level of responsiveness in meeting community development investment needs with \$5.4 million in equity investments and donations. Qualified investments for the Springfield MA represent 3.8 percent of total CRA investments 6.4 percent of bank deposits. Refer to the profile section of the PE for a discussion about community development opportunities.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Springfield MA is excellent. The investments primarily consist of tax credits totaling \$5.1 million and donations totaling \$331 thousand. A majority of the tax credits provided funding for various redevelopments of eligible building projects in the Center City area and job creation (full-time employment) for areas where unemployment has historically been high. The charitable donations primarily provided financial assistance to various local organizations that offer targeted community services for LMI individuals.

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.

We gave positive consideration for statewide investments totaling an additional \$11.8 million for the State of Missouri. Statewide investments primarily consist of \$6.8 million originated during the current evaluation period and \$425 thousand originated during the prior evaluating period in Missouri Housing Development Commission (MHDC) bonds that benefits the full- and limited-scope AAs. The Commission administers the federal and Missouri Low Income Housing Tax Credit (LIHTC) programs, federal HOME funds, the U.S. Department of Housing and Urban Development (HUD) Project Based Section 8 rental assistance contracts, and the Missouri Housing Trust Fund to help prevent homelessness and to provide emergency housing assistance for very low-income Missourians. Refer to Table 14 in the State of Missouri section of Appendix D for the facts and data that support these conclusions.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Columbia MA is not inconsistent with the bank's overall "Outstanding" performance under the Investment Test for the State of Missouri. In the St. Joseph MA, Joplin MA, California-Tipton MA, and the non-MA Missouri AA, the bank's performance is weaker than the bank's overall performance for the State of Missouri. Refer to Table 14 in the State of Missouri section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

The bank's performance under the Service Test in Missouri is rated "Outstanding." Based on a full-scope review, the bank's performance in the Springfield AA is excellent. Stronger performance in four of the limited-scope assessment areas had a positive impact on the service test rating. These assessment areas represent 62 percent of deposits in the state. 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.

Based on limited-scope reviews, the bank's performance in the California/Tipton, Columbia, Joplin and St Joseph MAs, and the non-MA combined AA is not inconsistent with the bank's

overall “Outstanding” performance under the Service Test in Missouri. Refer to Table 15 in the state of Missouri section of Appendix D for the facts and data used to evaluate the distribution of the bank’s branch delivery system and branch openings and closings.

Retail Banking Services

Commerce’s service delivery systems are readily accessible to geographies and individuals of different income levels. Branch distribution provides good accessibility in the Springfield assessment area. Excellent performance in the limited-scope AAs had a positive impact on the service test rating.

The level of community development services provided by bank staff is excellent.

The bank operates thirteen branches and thirty ATMs within the Springfield MA. One branch and four ATMs are located in low-income geographies, while two branches and nine ATMs are located in moderate-income geographies. The distribution of branches in low-income tracts significantly exceeds area demographic data. The distribution of branches in moderate-income tracts is slightly below area demographic data. Most of the branches and ATMs in middle- and upper-income geographies are located within a mile near the LMI tracts. Commerce did not open or close any branches during this evaluation period.

There is no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences its MA, particularly LMI 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 St. Louis MA in this PE for details on other alternative delivery systems offered by Commerce.

Community Development Services

The bank provided an excellent level of CD services in the Springfield MA. This conclusion is based on the responsiveness to the community needs.

Sixteen of the bank’s 61 officers for Springfield routinely provided financial expertise to 21 organizations, often serving in leadership roles. Roles served to provide financial expertise include being a member of the financial oversight board, finance committee, loan committee, and/or fundraising committee. They work with organizations that focus on providing affordable housing for LMI individuals, promoting economic development, revitalize/stabilize LMI geographies, and organizations that provide social services such as child care, health care, and education to LMI individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Service Test in the Columbia MA, Joplin MA, St. Joseph MA, and the combined non-MAs in Missouri is not inconsistent with the bank’s “Outstanding” rating in the state under the Service Test. Performance in the California/Tipton MA is adequate. No LMI geographies are located in this

AA. Weaker performance in the California /Tipton AA did not have an impact on the bank's overall service test performance.

State Rating

State of Kansas

CRA Rating for Kansas⁴: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The overall geographic distribution of loans is excellent. The distribution of small loans to businesses is excellent. The geographic distribution of home purchase, home improvement, and refinance loans is adequate.
- The overall distribution of loans to borrowers of different income levels and business of different sizes is excellent. The distribution of small loans to businesses is excellent. The distribution of small loans to farms and home mortgage loans is good. For home purchase and home improvement loans, performance to low-income borrowers is excellent considering the percentage of families below the poverty level. For refinance loans, performance to these borrowers is adequate. Performance to moderate-income borrowers is adequate for home improvement, home purchase and refinanced loans.
- The level of CD lending is excellent, which positively impacted the Lending Test rating.
- The level of qualified investments is high and demonstrates an excellent level of responsiveness to the AA's community development needs.
- Branch distribution is excellent and readily accessible to provide banking services in low and moderate-income geographies and to individuals of different income levels. Bank personnel provided a good level of community development services during this evaluation period.

⁴ 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.

Description of Institutions Operations in Kansas

Commerce operates 37 branches and 62 ATMs in the State of Kansas. This excludes the Kansas portion of the Kansas City MA, which is presented separately in the evaluation. The Kansas AA includes two metropolitan areas: Lawrence and Wichita. In addition, there are five non-metropolitan areas: Garden City, Hays, Hutchinson, Manhattan, and Pittsburg/Columbus. Twelve percent of the banks total deposits and 14 percent of total loans (by number) are attributed to these AAs in Kansas.

Commerce ranked fourth in deposit market share with a 6.89 percent of all deposits reported by FDIC-insured institutions operating in Kansas, including the Kansas portions of the Kansas City MA. Major competitors are Capital Federal Savings Bank (7.71 percent deposit market share) and Intrust Bank, National Association. (6.90 percent deposit market share).

Refer to the market profiles for the State of Kansas in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Kansas

We evaluated the bank's performance in the State of Kansas by performing a full-scope review of the Wichita MA. This AA has the largest percentage of deposits and loans in Kansas (excluding the Kansas City MA). We performed limited-scope reviews for the metropolitan area of Lawrence and the five non-metropolitan areas, which were combined for analysis purposes. Refer to Appendix A for more information.

To arrive at overall conclusions in the full-scope review, we placed more weight on small loans to businesses followed by home mortgage loans, which represent 66 percent and 23 percent of total reported loans, respectively. Within the home mortgage loan category, home purchase loans are the primary product followed by refinance loans. Small farm loans are 10 percent of total reported loans.

LENDING TEST

The bank's performance under the Lending Test in the State of Kansas is rated "Outstanding."

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Wichita MA is excellent.

Lending Activity

Refer to Tables 1 Lending Volume in the state of Kansas section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect excellent responsiveness in relation to area credit needs and the bank's deposit market share. Commerce has a deposit market share of 7.44 percent, which ranks fifth in the Wichita MA.

Small business loan activity in the Wichita MA is excellent. Commerce has a 7.84 percent market share (by dollar volume), which ranks third. Market share by number of loans is insignificant at less than two percent. The top four competitors have over 50 percent of the market and include nationwide banks and finance companies.

Home mortgage loan activity is not significant with a market share of less than two percent for home purchase, home improvement, and refinance loans.

Small farm loan activity is excellent. Commerce has a 14.2 percent market share (by number of loans), which ranks fourth.

Distribution of Loans by Income Level of the Geography

Commerce's geographic distribution of lending in the Wichita MA is excellent.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 for the Wichita MA 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.

Commerce's geographic distribution of home mortgage loans is adequate. Lending opportunities are limited in low-income geographies with less than two percent of owner-occupied housing in these areas. A market share analysis was not included in this lending evaluation.

The geographic distribution of home purchase, home improvement, and refinance loans is adequate. The percentage for both home purchase and home improvement loans in moderate-income tracts is below area demographic data. For refinance loans, the bank's performance in low-income tracts is above demographics and the percentage of loans in moderate-income tracts is below area demographic data.

Small Loans to Businesses

Refer to Table 6 for the Wichita MA in the state of Kansas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is excellent. The bank's performance in LMI geographies exceeds demographic data. .

Small Loans to Farms

Refer to Table 7 for the Wichita MA in the state of Kansas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The geographic distribution of small loans to farms is adequate considering the limited opportunities in LMI geographies. Lending opportunities are very limited in low-income geographies with 11 farms located in these geographies and somewhat limited in moderate-income geographies with 120 farms. The bank's performance in moderate-income census tracts is below area demographics data no farm loans were reported in low-income geographies.

Lending Gap Analysis

Our geographic distribution analysis included a review for lending gaps, particularly in LMI areas. We did not identify any conspicuous gaps in the Wichita MA.

Inside/Outside Ratio

We performed an analysis of this ratio at the bank level. Refer to this section under the St. Louis MA portion of this Performance Evaluation for details.

Distribution of Loans by Income Level of the Borrower

Commerce's distribution of loans to borrowers of different income levels and businesses of different sizes is excellent.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 for the Wichita MA 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.

Commerce's distribution of home mortgage loans to borrowers of different income levels is good. Market share was not included in this lending analysis. The percentage of families below the poverty level is 6.81 percent.

The overall distribution of home purchase and home improvement loans to borrowers of different income levels is good. For both loan products, performance to low-income borrowers is excellent considering the percentage of families below the poverty level. Performance to moderate-income borrowers is adequate.

The overall distribution of refinance loans to borrowers of different income levels is adequate. Performance to LMI borrowers is adequate considering the percentage of families below the poverty level.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes is excellent. The percentage of loans to businesses with revenues of \$1 million or less exceeds demographics. In addition, the market share of these loans exceeds the overall market share.

Small Loans to Farms

Refer to Table 12 for the Wichita MA 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/purchase of small loans to businesses.

The distribution of loans to farms of different sizes is good. The percentage of farms with revenues of \$1 million or less substantially meets demographics.

Community Development Lending

Refer to Table 1 Lending Volume for the Wichita MA 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 CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

Community Development lending performance is excellent. During the evaluation period, Commerce originated 23 CD loans totaling \$54 million in the Wichita MA. This level of CD lending had a positive impact on the Lending Test rating.

Seventeen loans totaling \$47 million were to help promote economic development by financing small businesses. Over 70 percent of these loans helped retain jobs in moderate-income tracts. Six loans totaling \$7 million provided community services targeted to LMI individuals. Over 90 percent of the funds were to a nonprofit agency specializing in family services, including foster care and counseling.

Product Innovation and Flexibility

Commerce participates in a flexible mortgage loan program to address the credit needs of LMI individuals and in LMI geographies. This program had a neutral impact on the bank's Lending Test rating.

Commerce, through its mortgage company subsidiary, offers a closing cost program to provide up to \$1,500 in assistance to borrowers that meet income requirements. This funding assistance is only available for home purchase loans in LMI geographies. During the evaluation period, Commerce provided assistance through this program to 17 participants with

properties located in LMI tracts throughout all AAs. The total for the home purchase loans was \$1,277,989.

Commerce was unable to provide information regarding the total number and/or dollar volume of these loans originated in the AA during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Lawrence MA and nonMA KS AAs is weaker than the bank's overall "Outstanding" performance under the Lending Test in Kansas. In the Lawrence MA, the overall geographic distribution of small loans to businesses is good. In the non-MA KS AA, the geographic distribution of small loans to businesses is adequate.

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

The bank's performance under the Investment Test in Kansas is rated "Outstanding."

Commerce demonstrated an excellent level of responsiveness in meeting the community development investment needs with \$6.3 million current period and \$408 thousand prior period equity investments and donations. Investments for this AA represent five percent of the total investments for the State of Kansas. Refer to the profile section in Appendix C for the State of Kansas for a discussion about CD opportunities.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Wichita MA is excellent with investments totaling \$6.8 million. The largest investments included in this total primarily consists of \$580 in donations, \$3 million in targeted affordable housing bonds for LMI individuals in participating communities and a \$1.6 million investment in Historic Preservation Tax Credits (HPTC)s used for the revitalization / stabilization of designated areas. HPTCs are complex investments. Commerce is one of the primary investors in this program. To be eligible for historic state or federal credits, a building must either:

- Be commercial or residential rental property.
- Be listed individually in the National Register of Historic Places, or
- Be a contributing element of a historic district that is listed in the National Register of Historic Places, or
- Be a contributing element of a Local Historic District that has been certified by U.S. Department of the Interior as substantially meeting National Register criteria.

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.

We gave positive consideration for statewide investments totaling an additional \$2.9 million for the State of Kansas. The statewide investments primarily consist of \$1.7 million invested in the Kansas Equity Fund of which \$750 thousand represents current period investments and \$1.2 invested in the Kansas Venture Capital fund. The funds have the potential to benefit the bank's full and limited scope AAs. Refer to Table 14 in the State of Kansas section of Appendix D for the facts and data that support these conclusions.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Lawrence MA and the non-MA Kansas AA is not inconsistent with the bank's overall "**Outstanding**" performance under the Investment Test for the State of Kansas. Refer to Table 14 in the State of Kansas section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

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

Retail Banking Services

Commerce's service delivery systems are readily accessible to geographies and individuals of different income levels in the Wichita MA. The level of community development services provided by bank staff is good.

The distribution of branches and ATMs in LMI geographies exceeds the percentage of population residing in those tracts. Commerce opened one branch in an upper-income tract and closed one branch in a moderate-income tract. However, it did not impact the overall demographics of the MA.

There is no material difference in services offered at branch locations. Banking hours do not vary in a way that inconveniences the MA, particularly LMI geographies and individuals. ATMs offer 24-hour service.

Community Development Services

The bank provided a good level of CD services in the Wichita MA. This is based on the volume of service activity, the degree of innovation or complexity, and the responsiveness to the needs of the community.

Bank personnel participate on an ongoing basis in several organizations providing financial expertise. Activities involve providing financial expertise to social service organizations that

offer health care, childcare, and meals for LMI individuals. The activities respond to the social service needs of the community, but are not innovative or complex.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Lawrence MA and non-MA Kansas is not inconsistent with the bank's overall "Outstanding" rating in the state under the Service Test.

State Rating

State of Illinois

CRA Rating for Illinois⁵: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The overall geographic distribution of loans is excellent. The distribution of small loans to businesses and home improvement loans is excellent. The geographic distribution of refinance and home purchase loans is good.
- The overall distribution of loans to borrowers of different income levels and businesses of different sizes is excellent. The distribution of small loans to businesses and farms is excellent. Considering the percentage of families below poverty level, home purchase and home improvement loans to low-income borrowers is excellent. The performance of refinance loans to these borrowers is good. For refinance loans, performance to moderate-income borrowers is good. The performance of home purchase and home improvement loans to these borrowers is adequate and excellent, respectively.
- The level of CD lending is excellent, which had a positive impact on the Lending Test rating.
- The level of qualified investments is excellent.
- Branch distribution is good. The branch distribution, provides access to banking services in low and moderate-income geographies and to individuals of different income levels. Bank personnel provided a good level of community development services during this evaluation period.

⁵ 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.

Description of Institutions Operations in Illinois

Commerce operates 15 branches and 19 ATMs in the State of Illinois. This excludes the Illinois portion of the St. Louis MA, which is presented separately in this evaluation. The Illinois AAs include three metropolitan areas: Bloomington, Champaign, and Peoria. Six percent of the banks total deposits and six percent of total reported loans (by number) are attributed to these AAs.

Commerce ranked seventh in deposit market share with a 2.96 percent of all deposits reported by FDIC-insured institutions operating in Illinois, including the Illinois portions of the St. Louis MA. Major competitors are State Farm Bank (29.61 percent deposit market share), and Busey Bank (7.00 percent deposit market share).

Refer to the market profiles for the state of Illinois in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Illinois

We evaluated the bank's performance in the State of Illinois by performing a full-scope review of the Peoria MA. This AA has the largest percentage of deposits and the 2nd largest percentage of loans in Illinois (excluding the St. Louis MA). We performed limited-scope reviews for the metropolitan areas of Bloomington and Champaign. Refer to Appendix A for more information.

To arrive at overall conclusions in the full-scope review, we placed more weight on small loans to businesses followed by home mortgage loans. Small loans to businesses and home mortgage loans represent 52 percent and 28 percent of total reported loans, respectively. Within the home mortgage loan category, refinance loans are the primary product followed by home purchase loans. Small farm loans are 18 percent of total reported loans.

LENDING TEST

The bank's performance under the Lending Test in the State of Illinois is rated "Outstanding."

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Peoria MA is excellent.

Lending Activity

Refer to Tables 1 Lending Volume for the Peoria MA 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 good responsiveness in relation to area credit needs and the bank's deposit market share. Commerce has a deposit market share of 7.03 percent, which ranks fifth in the Peoria MA.

Small business loan activity in the Peoria MA is good. By dollar volume, Commerce has a 7.77 percent market share, which ranks fifth. By number of loans, the market share is less than two percent.

Home mortgage loan activity is adequate. The market share for home purchase, home improvement, and refinance loans is not significant at less than three percent. However, strong competition is provided by over 300 lenders. Top competitors are nationwide banks and finance companies. Less than three lenders have a market share over seven percent in any home mortgage loan category. Only the top ten lenders of home purchase and refinance loans have a market share over three percent. For home improvement loans, only the top eight lenders have a market share over three percent.

Small farm loan activity is excellent. Commerce has a market share of 12.10 percent, which ranks third in the Peoria MA.

Distribution of Loans by Income Level of the Geography

Commerce's geographic distribution of lending in the Peoria MA is excellent.

Home Mortgage Loans

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

Commerce's geographic distribution of home mortgage loans is good. A market share analysis was not included in this lending evaluation.

The geographic distribution of refinance and home purchase loans is good. The percentage of refinance loans in moderate-income geographies exceeds demographics. For home purchase loans, the percentage of loans in these tracts is slightly less than area demographic data. The geographic distribution of home improvement loans is excellent. The percentage of these loans in moderate-income tracts exceeds demographics. Refinance and home improvement loans in low-income tracts are less than demographics; however, only three percent of owner-occupied housing is in these areas. Commerce did not originate or purchase any home purchase loans in low-income tracts.

Small Loans to Businesses

Refer to Table 6 for the Peoria MA in the state of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is excellent. Performance in low-income tracts is excellent and exceeds demographics. Performance in moderate-income tracts is substantially near area demographic data and the market share in these geographies exceeds the overall market share.

Small Loans to Farms

Refer to Table 7 in the state of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms. The geographic distribution of small loans to farms is adequate. Performance in moderate-income geographies is less than demographics. No loans were made in low-income tracts. However, lending opportunities in low- and moderate-income tracts is extremely limited with less than one percent and three percent of farms in these areas, respectively.

Lending Gap Analysis

Our geographic distribution analysis included a review for lending gaps, particularly in LMI areas. We did not identify any conspicuous gaps in the Peoria MA AA.

Inside/Outside Ratio

We performed an analysis of this ratio at the bank level. Refer to this section under the St. Louis MA portion of this Performance Evaluation for details.

Distribution of Loans by Income Level of the Borrower

Commerce's distribution of loans to borrowers of different income levels and businesses of different sizes is excellent.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 for the Peoria MA in the state of Illinois 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.

Commerce's distribution of home mortgage loans to borrowers of different income levels is good. A market share analysis was not included in this lending evaluation. The percentage of families below the poverty level is 7.05 percent.

The overall distribution of refinance and home purchase loans to borrowers of different income levels is good. Considering the percentage of families below the poverty level, the distribution of refinance and home purchase loans to low-income borrowers is good and excellent, respectively. Performance of refinance and home purchase loans to moderate-income borrowers is adequate. The bank's performance is slightly below area demographic data.

The overall distribution of home improvement loans to borrowers of different income levels is excellent. The distribution of loans to low-income borrowers is excellent considering the

percentage of families below the poverty level. The percentage of loans to moderate-income borrowers exceeds demographics.

Small Loans to Businesses

Refer to Table 11 for the Peoria MA 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 businesses with revenues of \$1 million or less substantially meets demographics. The market share of these loans exceeds the overall market share.

Small Loans to Farms

Refer to Table 12 for the Peoria MA 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/purchase of small loans to businesses.

The distribution of loans to farms of different sizes is excellent. The percentage of loans to farms with revenues of \$1 million or less is substantially near demographic data. The market share of these loans exceeds the overall market share.

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 CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Community Development lending performance is excellent. During the evaluation period, Commerce originated 30 CD loans totaling \$23 million in the Peoria MA. This level of CD lending had a positive impact on the Lending Test rating.

Eight loans totaling \$21 million were to help promote economic development by financing small businesses. Over 85 percent of these loans helped retain jobs in LMI tracts. Four loans totaling \$1.5 million provided community services targeted to LMI individuals. A majority of the funding was to a nonprofit organization that provides health care services to persons who are developmentally disabled and mentally ill. Eighteen loans totaling \$438 thousand were to organizations that provide affordable housing.

Product Innovation and Flexibility

Commerce participates in a flexible mortgage loan program to address the credit needs of LMI individuals and in LMI geographies. The bank also participates in a loan program that assists small businesses to provide jobs for LMI individuals. These programs had a neutral impact on the bank's Lending Test rating.

Commerce, through its mortgage company subsidiary, offers a closing cost program to provide up to \$1,500 in assistance to borrowers that meet income requirements. This funding assistance is only available for home purchase loans in LMI geographies. During the evaluation period, Commerce provided assistance through this program to 17 participants with properties located in LMI tracts throughout all AAs. The total for the home purchase loans was \$1,277,989.

In addition, Commerce participates in the Illinois First Linked Deposit Business Loan Program, which links state funds deposited in the lending institution to reduce interest rates to borrowers. The program was established to provide financing for small businesses creating jobs in Illinois. The program also helps create and retain jobs in depressed rural or urban areas. Business must be for profit and have less than 25 employees. Eligible businesses include new, existing or expanding firms that employ 10 or more full-time employees annually. The business must create at least one job for each \$50,000 borrowed. The Illinois program will finance larger businesses (up to \$5 million in revenues) for job creation in low-income census tracts. In Illinois, the bank has 13 customers with notes outstanding.

Commerce was unable to provide information regarding the total number and/or dollar volume of these loans originated in the AA during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bloomington MA is not inconsistent with the bank's overall "Outstanding" performance under the Lending Test in Illinois. This AA makes up 51 percent of the total reported loans in the state of Illinois.

In the Champaign MA the bank's performance is weaker than the bank's overall performance in the state. The overall geographic distribution of small loans to businesses and home mortgage loans is adequate. The distribution of loans to business of different sizes is good. The overall distribution of home mortgage loans to borrowers of different income levels is adequate. The distribution of loans to farms of different sizes is also adequate. This AA makes up less than two percent of the total reported loans in the state of Illinois.

Refer to the Tables 1 through 13 in the state of Illinois section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test for the State of Illinois is rated "Outstanding."

Commerce and its investment affiliate demonstrated an excellent level of responsiveness in meeting the AA's community development investment needs \$3.4 million in equity investments and donations. Qualified investments for the Peoria AA represent two percent of total CRA

investments for the bank and three percent of bank deposits. Refer to the profile section of the PE for a discussion about community development opportunities.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Peoria AA is excellent. The investments primarily consist of \$3.1 million invested in the state of Illinois Housing Development Authority (IHDA) revenue bonds targeted for various affordable housing projects that benefit LMI individuals within the AA. IHDA is a state financing entity that helps to provide funding for single and multi-family projects located in targeted areas and communities to provide homeownership and affordable rental properties for LMI individuals. The programs include financing for multi-family rental properties located in targeted areas/communities. 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.

The statewide prior period investment in the Illinois Equity Fund with a balance of \$250 thousand had a neutral impact on the bank's overall Investment rating. Refer to Table 14 in the statewide section for the State of Illinois section of Appendix D for the facts and data that support this conclusion.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bloomington MA and the Champaign MA is weaker than the bank's overall "Excellent" performance under the Investment Test for the state of Illinois. Refer to Table 14 in the State of Illinois 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 Illinois is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Peoria 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

Commerce's service delivery systems are accessible to geographies and individuals of different income levels in the Peoria MA. Bank staff provides a good level of community development services.

The bank's branches are accessible to people and geographies of different income levels. The percentage of branches in low-income tracts exceeds demographics. The bank does not have branches in moderate-income tracts. Commerce did not open or close any branches in LMI tracts. The bank opened one branch during the evaluation period in an upper-income tract in the Peoria MA. There is no material differences in services offered at branch locations.

Banking hours do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. Drive-up facilities offer extended hours Monday – Friday. ATMs offer 24-hour service.

Community Development Services

The bank provided a good level of CD services in the Peoria MA. This is based on the volume of service activity, the degree of innovation or complexity, and the responsiveness to the needs of the community.

Commerce bank personnel provided their financial expertise to 31 different organizations that provide community development initiatives in the MA. Twenty organizations provide community services targeted to LMI individuals. The other organizations provide affordable housing and economic development to LMI individuals and geographies.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Bloomington and Champaign MAs Illinois is not inconsistent with the bank's overall "Low Satisfactory" rating for the state of Illinois.

State Rating

State of Oklahoma

CRA Rating for Oklahoma: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The overall geographic distribution of loans is poor. The distribution of small loans to businesses is poor. The geographic distribution of home purchase and refinance loans is poor.
- The overall distribution of loans to borrowers of different income levels and business of different sizes is adequate. The distribution of small loans to businesses is adequate. For home purchase and refinance loans, performance to LMI borrowers is poor.
- The bank's excellent level of community development lending had a positive impact on the Lending Test rating.
- Commerce demonstrated an excellent level of responsiveness in meeting the AA's community development investment needs with \$2.7 million invested in equity funds and donations.
- The retail delivery systems provide adequate access to geographies and individuals of different income levels. Bank staff provided an adequate level of financial expertise to local organizations that offers social services for LMI individuals.

Description of Institutions Operations in Oklahoma

Commerce operates two branches and one ATM in the State of Oklahoma. This Oklahoma Assessment area includes the metropolitan area of Tulsa. One percent of the bank's total deposits and one percent of total reported loans (by number) are in the AA.

Commerce ranked 31st in deposit market share with 0.58 percent of all deposits reported by FDIC-insured institutions operating in Oklahoma. Major competitors are Bank of Oklahoma (24.06 percent deposit market share) and Arvest Bank (6.95 percent deposit market share).

Refer to the market profiles for the State of Oklahoma in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Oklahoma

Commerce has one AA in the State of Oklahoma. The state rating was based on a full-scope review in the Tulsa MA. Commerce has been in this market for a short period of time (less than two years). Refer to Appendix A and the Description of Institution sections for additional information.

To arrive at overall conclusions, we place more weight on small loans to businesses followed by home mortgage loans. Small loans to businesses and home mortgage loans represent 85 percent and 14 percent of total reported loans, respectively. Within the home mortgage loan category, home purchase loans are the primary product followed by refinance loans. Commerce did not originate or purchase any home improvement or multi-family loans during the evaluation period.

LENDING TEST

The bank's performance under the Lending Test in the State of Oklahoma is rated "Low Satisfactory."

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

Refer to Tables 1 Lending Volume in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect adequate responsiveness in relation to area credit needs and the bank's deposit market share. Commerce has a deposit market share of 0.92 percent, which ranks 22nd in the Tulsa MA.

Small business loan activity in the Tulsa MA is adequate with a market rank of 22nd. Market share is not significant at less than one percent.

Home mortgage loan activity is adequate. Market share for home purchase and refinance loans is minimal at less than 0.20 percent. Competition is strong with over 300 lenders in the AA. A majority of the top lenders are nationwide financial institutions and mortgage companies. This is a competitive market that Commerce has been in for a short period of time during the evaluation period (less than two years). Commerce acknowledges the low lending level and purchased a Federal National Mortgage Association (FNMA) bond valued at \$532 thousand targeted to LMI that helps meet of affordable housing. Refer to the Investment Test section for details.

Distribution of Loans by Income Level of the Geography

Commerce's geographic distribution of lending in the Tulsa MA is poor

Home Mortgage Loans

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

Commerce's geographic distribution of home mortgage loans is poor. A market share analysis was not included in this lending evaluation.

The geographic distribution of home purchase and refinance loans is poor. The bank did not originate or purchase any of these loans in LMI geographies. Opportunities exist in moderate-income tracts with 19 percent of owner-occupied units. Lending opportunities are limited in low-income geographies with less than four percent of owner-occupied housing in these areas.

This is a competitive market that Commerce has been in for a short period of time during the evaluation period (less than two years). Commerce acknowledges the low lending level and purchased a FNMA bond targeted to LMI to help meet affordable housing needs. Refer to the Investment Test section for details.

Small Loans to Businesses

Refer to Table 6 for the Tulsa MA in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is poor. Performance in moderate-income geographies is below area demographics and considered poor. Performance in low-income geographies is less than demographic data; however, lending opportunities are limited with less than 1.50 percent of business in these areas.

Lending Gap Analysis

Our geographic distribution analysis included a review for lending gaps, particularly in LMI areas. We did not identify any conspicuous gaps in the Tulsa MA

Inside/Outside Ratio

We performed an analysis of this ratio at the bank level. Refer to this section under the St. Louis MA portion of this Performance Evaluation for details.

Distribution of Loans by Income Level of the Borrower

Commerce's distribution of loans to borrowers of different income levels and businesses of different sizes is adequate.

Home Mortgage Loans

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

Commerce's distribution of home mortgage loans to borrowers of different income levels is poor. A market share analysis was not included in this lending evaluation.

The overall distribution of home purchase and refinance loans to borrowers of different income levels is poor. Commerce did not originate or purchase home mortgage loans to LMI borrowers during the evaluation period. Lending opportunities are available as LMI families make up 18.98 percent and 17.50 percent of total families in the AA, respectively.

This is a competitive market that Commerce has been in for a short period of time during the evaluation period (less than two years). Commerce acknowledges the low lending level and purchased a FNMA bond targeted to LMI to help meet affordable housing needs. Refer to the Investment Test section for details.

Small Loans to Businesses

Refer to Table 11 for the Tulsa MA 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 is adequate. The percentage of loans to businesses with revenues of \$1 million or less is below area demographic data.

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 CD loans, including multifamily loans that also qualify as CD loans. In addition,

Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

Community development lending is excellent. During the evaluation period, Commerce originated two CD loans totaling \$3 million in the Tulsa MA. Both loans helped promote economic development by financing small businesses. They also helped retain jobs in moderate-income tracts.

Product Innovation and Flexibility

Commerce, through its mortgage company subsidiary, offers a closing cost program to provide up to \$1,500 in assistance to borrowers that meet income requirements. This funding assistance is only available for home purchase loans in LMI geographies. During the evaluation period, Commerce provided assistance through this program to 17 participants with properties located in LMI tracts throughout all AAs. The total for the home purchase loans was \$1,277,989.

Information regarding the total number and/or dollar volume of these loans originated in the AA during the evaluation period was not available.

INVESTMENT TEST

The bank's performance under the Investment Test in Oklahoma is rated "Outstanding." Based on a full-scope review, the bank's performance in the Tulsa MA is excellent.

Commerce and its affiliates demonstrated an excellent level of responsiveness in meeting the AA's community development investment needs with \$3.8 million in equity investments and donations. The investments primarily consist of a \$2.2 million in SBIC by Capital for Business and two affordable housing bonds totaling \$1.1 million that provides funding for LMI affordable housing projects located throughout the state of Oklahoma that benefits the Tulsa AA. The \$1.1 million consists of a \$535 thousand equity investment with the Oklahoma Housing and Finance Authority and a \$532 thousand FNMA bond specifically targeting LMI borrowers in Tulsa County. Management stated that the FNMA bond was specifically purchased due to low lending levels in the Tulsa AA. Refer to the State of Oklahoma section in Appendix C for details regarding qualified investment opportunities.

The bank's current period \$500 thousand statewide investment in the Oklahoma Equity fund had a neutral impact on the Investment rating.

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.

SERVICE TEST

The bank's performance under the Service Test in the State of Oklahoma is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Tulsa 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

Retail delivery systems are adequate given the limited time that Commerce has operated the two branches. These two branches are not located in LMI geographies. Commerce offers extended hours of operation to increase the accessibility of services for area residents. The Utica Square branch lobby hours are 8:00am to 6:00pm, and the 81st branch drive-up hours are 7:30am to 6:00pm.

Commerce offers a free checking account and low minimum balance savings and IRA products. Alternative delivery systems include automated teller machines, Internet or PC banking, banking by phone, and a 24-hour account information line. Commerce did not provide specific information on usage by LMI people. Therefore, we could not place significant weight on these systems.

Community Development Services

Bank staff provided an adequate level of financial expertise to local organizations that offers social services for LMI individuals in the Tulsa MA. The staff primarily participated as members of budget and finance committees for four local organizations. The organizations provide social services: counseling, housing, and meals for LMI individuals.

State Rating

State of Colorado

CRA Rating for Colorado: 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:

- The overall geographic distribution of loans is excellent. Penetration in LMI areas is excellent for small business, home purchase and refinanced loans.
- The overall distribution of loans to borrowers of different income levels and businesses of different sizes is poor. The performance for loans to businesses with revenues of \$1 million or less is poor. The distribution of home mortgage loans is good. The distribution of home purchase loans to low-income borrowers is excellent considering the percentage of families below the poverty level. Performance of these loans moderate-income borrowers is adequate. The distribution of refinance loans to moderate-income borrowers is good; however, no loans were made to low-income borrowers during the evaluation period.
- The level of CD lending is excellent, which positively impacted the Lending Test rating.
- The level of qualified investments is adequate in the AA. We also gave positive consideration to a \$1.7 million statewide investment that has the potential to benefit the AA and is responsive to community development needs.
- Branch distribution is good, providing reasonable access: to banking services in LMI geographies and to individuals of different income levels. Bank personnel provided a good level of community development services during this evaluation period.

Description of Institution's Operations in Colorado

Commerce operates one branch and four ATMs in the State of Colorado. The Colorado AA is the Denver-Aurora metropolitan area. Less than one percent (0.59) of the bank's total deposits and less than one percent (0.34) of total reported loans (by number) is attributed to this AA.

Commerce holds 0.17 percent of all deposits reported by FDIC-insured institutions operating in Colorado, this includes the Denver-Aurora MSA. Major competitors are First Bank of Evergreen (0.35 percent deposit market share) and First Bank of Parker (0.33 percent deposit market share).

Refer to the market profiles for the state of Colorado in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Colorado

Commerce has one AA in the State of Colorado. The state rating was based on a full-scope review in the Denver-Aurora MA. Please refer to Appendix A for more information.

To arrive at overall conclusions, we placed more weight on small loans to businesses followed by home mortgage loans. Small loans to businesses and home mortgage loans represent 73 percent and 23 percent of total reported loans, respectively. Within the home mortgage loan category, home purchase loans are the primary product followed by refinance loans.

LENDING TEST

The bank's performance under the Lending Test in the State of Colorado is rated "High Satisfactory."

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Denver-Aurora MA is good.

Lending Activity

Refer to Tables 1 Lending Volume for the Denver-Aurora MA in the state of Colorado 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. Commerce has a market share of 0.22 percent, which ranks 49th.

Small business loan activity is adequate with a market rank of 37th. Market share is minimal at less than one percent.

Home mortgage loan activity is adequate. Market share for home purchase and refinance loans is minimal at less than 0.10 percent. Competition is strong with over 500 lenders in the AA. The top lenders are nationwide financial institutions and finance companies

Distribution of Loans by Income Level of the Geography

Commerce's geographic distribution of lending in the Denver-Aurora MA is excellent.

Home Mortgage Loans

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

Commerce's geographic distribution of home mortgages is excellent. A market share analysis was not included in the lending evaluation.

The geographic distribution of home purchase and refinance loans is excellent. The bank's performance in low-income geographies is excellent and substantially exceeds area demographic data for both products. Performance in the moderate-income geographies is excellent and substantially exceeds area demographic data.

Small Loans to Businesses

Refer to Table 6 for the Denver-Aurora in the state of Colorado section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is excellent. Performance in low- and moderate-income tracts exceeds area demographic data. A market share analysis was not included in this lending evaluation.

Lending Gap Analysis

Our geographic distribution analysis included a review for lending gaps, particularly in LMI areas. We did not identify any conspicuous gaps in the Denver-Aurora MA AA

Inside/Outside Ratio

We performed an analysis of this ratio at the bank level. Refer to this section under the St. Louis MA portion of this Performance Evaluation for details.

Distribution of Loans by Income Level of the Borrower

Commerce's distribution of loans to borrowers of different income levels and businesses of different sizes is poor.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 Denver-Aurora MA in the state of Colorado 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.

Commerce's distribution of home mortgage loans to borrowers of different income levels is good. A market share analysis was not included in this lending evaluation. The percentage of families below the poverty level is 7.15 percent.

The overall distribution of home purchase loans to borrowers of different income levels is good. Performance to low-income borrowers is excellent considering the percentage of families below the poverty level. Performance to moderate-income borrowers is adequate. The bank's performance is slightly below area demographics data.

The distribution of refinance loans to borrowers of different income levels is adequate. Performance to moderate-income borrowers is good. The bank's performance is substantially near area demographic data. Commerce did not originate or purchase any refinance loans to low-income borrowers during the evaluation period.

Small Loans to Businesses

Refer to Table 11 in the state of Colorado 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 business of different sizes is poor. The percentage of loans to businesses with revenues of \$1 million or less is less than area demographic data. A market share analysis was not included in this lending evaluation.

Community Development Lending

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

Community Development lending performance is excellent considering the fact that this AA has only been part of the bank since March 2008. The Denver-Aurora MA has only 0.35 percent of total reported loans; however, it has 2 percent of total CD loans. This level of CD lending had a positive impact on the Lending Test rating.

During the evaluation period, Commerce originated six CD loans totaling \$8 million in the Denver-Aurora MA. Five loans totaling \$7.9 million were to help promote economic development by financing small businesses. Eighty percent of these loans helped retain jobs in low-income tracts. One loan totaling \$250 thousand was to an organization that provided affordable housing.

Product Innovation and Flexibility

Commerce, through its mortgage company subsidiary, offers a closing cost program to provide up to \$1,500 in assistance to borrowers that meet income requirements. This funding assistance is only available for home purchase loans in LMI geographies. During the evaluation period, Commerce provided assistance through this program to 17 participants with properties located in LMI tracts throughout all AAs. The total for the home purchase loans was \$1,277,989. Information regarding the total number and/or dollar volume of these loans originated in the AA during the evaluation period was not available.

INVESTMENT TEST

The bank's performance under the Investment Test in Colorado is rated "Low-Satisfactory." Based on a full-scope review, the bank's performance in the Denver-Aurora MA is adequate. AA investments consist of donations totaling \$40 thousand. Refer to the profile section of Appendix C for the state of Colorado for details discussing investment opportunities. Refer to Table 14 in the State of Colorado section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

We also gave positive consideration for the bank's statewide \$1.7 million investment in the statewide Colorado Housing and Finance Authority (CHFA) affordable housing revenue bond. CFHA provides fixed-rate financing for LMI homebuyers, small business and multi-family rental housing developers.

SERVICE TEST

The bank's performance under the Service Test in Colorado is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Denver/Aurora MA is good. Refer to Table 15 in the state of Colorado 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

Commerce's service delivery systems are accessible to geographies and individuals of different income levels in the Denver/Aurora MA. Bank staff provides a good level of community development services.

The distribution of branches and ATMs in moderate-income tracts exceeds the percentage of population residing in those tracts. There are no branches or ATMs in the low-income tracts. However, there are only 21 low-income geographies in the AA and only 7 percent of the population resides in these tracts. Therefore, more weight is placed on performance in moderate-income geographies. Commerce did not open or close any branches in the AA during the evaluation period.

There is no material difference in services offered at branch locations. Banking hours do not vary in a way that inconveniences the AA, particularly LMI geographies. Drive-up facilities offer extended hours on Saturday, and ATMs offer 24-hour service.

Community Development Services

The bank provided a good level of CD services in the Denver/Aurora MA. Bank personnel participate on an ongoing basis in several organizations providing financial expertise. Many of the activities are small business and job creation that primarily serves small businesses and LMI individuals in the community. Other activities involve providing financial expertise to schools offering scholarships to LMI students and an organization that is revitalizing the Denver/Aurora area. The activities respond to the social service needs of the community.

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS: Commerce Bank, National Association				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Multistate Rating
Commerce Bank, National Association	Outstanding	Outstanding	High Satisfactory	Outstanding
Multistate Metropolitan Area or State:				
St. Louis MA	Outstanding	Outstanding	Low Satisfactory	Outstanding
Kansas City MA	Outstanding	Outstanding	Outstanding	Outstanding
State of Missouri	Outstanding	Outstanding	Outstanding	Outstanding
State of Kansas	Outstanding	Outstanding	Outstanding	Outstanding
State of Illinois	Outstanding	Outstanding	Low Satisfactory	Outstanding
State of Oklahoma	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Colorado	High Satisfactory	Low Satisfactory	High 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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St. Louis MO-IL Multistate Metropolitan Area

Demographic Information for Full Scope Area: St Louis MO IL						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	492	11.18	24.19	40.65	23.17	0.81
Population by Geography	2,389,128	6.19	20.34	45.85	27.61	0.01
Owner-Occupied Housing by Geography	660,004	3.29	17.20	48.91	30.60	0.00
Business by Geography	167,509	5.17	18.51	43.10	32.89	0.34
Farms by Geography	4,040	1.34	9.78	62.15	26.63	0.10
Family Distribution by Income Level	628,328	19.23	17.95	22.22	40.60	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	233,598	11.35	30.80	44.96	12.89	0.00
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below Poverty Level		53,435 65,000 10%	Median Housing Value Unemployment Rate (2000 US Census)	107,532 2.87%		

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

Source: 2000 US Census and 2008 HUD updated MFI

The St. Louis MA AA consists of the following six contiguous counties: Jefferson, St. Charles, St. Louis, and St. Louis City in Missouri; and Madison, Monroe, and St. Claire in Illinois. This AA complies with the regulation and does not arbitrarily exclude any LMI areas. The AA has 492 census tracts, which are designated 11 percent low-income, 24 percent moderate-income, 41 percent middle-income, 23 percent upper-income, and 1 percent NA. The households below poverty level are at 10 percent. See the table above for additional information about LMI tracts within the AA. Commerce's business strategy focused on business development, while offering a wide variety of other commercial and retail products and services.

Based on information from industry economic information, the St. Louis economy will continue to slide deeper into recession as manufacturing payrolls continue to decline and the housing market correction causes additional declines in construction employment. Service industries will also be hindered as consumers become increasingly frugal until the labor market settles and the financial market stabilizes. The unemployment rate jumped over the national average of 8.9 percent to 9.4 percent, compared to the state of Missouri at 8.1 percent. Over the long run, St. Louis will likely continue to experience decreasing demographic trends as current and potential migrants continue to be attracted to nearby metro areas such as Kansas City and Chicago. St. Louis' largest employers are services, government, and retail, including universities and hospitals. Major corporations in the AA are BJC Healthcare, Boeing Integrated Defense Systems, and Scott Air Force Base.

We reviewed two recent community contacts in this AA to obtain a profile of the community, identify community development needs and opportunities, and to assess perceptions of the performance of local financial institutions. Opportunities to participate in community development activities are available in this AA. The community contacts identified a lack of branches in LMI neighborhoods, need for business lending, an opportunity for below market financing for rental housing.

Kansas City KS-MO Multistate Metropolitan Area

Demographic Information for Full Scope Area: Kansas City KS MO						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	481	9.56	24.95	38.05	24.95	2.49
Population by Geography	1,672,418	5.22	19.59	45.36	29.81	0.02
Owner-Occupied Housing by Geography	441,675	3.26	16.01	46.53	34.20	0.00
Business by Geography	129,279	4.39	17.33	43.10	34.15	1.03
Farms by Geography	3,069	1.82	10.46	52.79	34.73	0.20
Family Distribution by Income Level	440,421	18.02	18.47	23.54	39.97	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	160,723	9.61	30.26	46.13	14.00	0.00
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below Poverty Level		55,031 67,800 8%		Median Housing Value Unemployment Rate (2000 US Census)	107,611 2.25%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2008 HUD updated MFI

The Kansas City MA AA consists of the following seven contiguous counties: Cass, Clay, Jackson, and Platte in Missouri; and Johnson, Leavenworth, and Wyandotte in Kansas. The delineation of the AA complies with the regulation and does not arbitrarily exclude and LMI areas. The Kansas City AA has 481 census tracts, which are designated 10 percent low-income, 25 percent moderate-income, 38 percent middle-income, 25 percent upper-income, and 2 percent NA. The households living below the poverty level is at 8 percent. See the above table for additional information about LMI tracts within the AA. Commerce’s business strategy is focused on business development, while offering a wide variety of other commercial and retail products and services.

Based on information from industry economic information, the Kansas City economic conditions are weakening as most industries reduce payrolls. The area will likely remain in recession for the next year as most industries are struggling with reduced demand. The metro area’s auto industry is also struggling as demand has plunged and domestic automakers struggle to survive. Though not as severe as the nation, the housing market will continue to weigh on the metro area as homebuilders idle construction until supplies clear. Over the long run industry structure and advantageous workforce characteristics will allow the area to outperform nearby metro areas, though still under performing the nation as baby boomers begin to retire. With the national average of unemployment rising, Kansas City is below the national average of 8.9 at 8.2 percent, compared to the state rate of Missouri at 8.1 percent. Kansas City’s largest industries are retail, and services. Major employers in the AA are Sprint Corporation, HCA Midwest Health System, Ford Motor Company, General Motors, and Hallmark.

We reviewed two recent community contacts in this AA to obtain a profile of the community, identify community development needs and opportunities, and to assess perceptions of the performance of local financial institutions. The community contacts identified the rate of the economic growth as suffering since mid 2007. The contacts recognize small business lending and affordable housing as primary community needs. Opportunities to participate in community development activities are readily available in this AA. The contacts indicated local banks provide adequate financial and overall available and willing to help when possible.

State of Missouri: Springfield MA

Demographic Information for Full Scope Area: Springfield MO						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	81	2.47	22.22	49.38	25.93	0.00
Population by Geography	337,329	1.79	21.36	51.43	25.42	0.00
Owner-Occupied Housing by Geography	89,803	0.04	17.71	52.65	29.60	0.00
Business by Geography	30,027	2.99	19.29	51.23	26.49	0.00
Farms by Geography	1,058	0.38	18.43	60.21	20.98	0.00
Family Distribution by Income Level	89,680	17.32	19.29	24.01	39.38	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	32,835	0.61	30.10	53.84	15.45	0.00
Median Family Income		41,591	Median Housing Value	89,484		
HUD Adjusted Median Family Income for 2008		49,300	Unemployment Rate	2.62%		
Households Below Poverty Level		12%	(2000 US Census)			

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

Source: 2000 US Census and 2008 HUD updated MFI

The Springfield Missouri AA includes the four contiguous counties of Christian, Dallas, Greene, and Polk. This AA complies with the regulation and does not arbitrarily exclude any LMI areas. The AA has 81 census tracts, which are designated 2 percent low-income, 22 percent moderate-income, 49 percent middle-income, 26 percent upper-income, and no NA. Poverty level in this area is at 12 percent. See the table above for additional information about LMI tracts in AA.

Based on information from industry economic information, the Springfield economy has survived the current economic downturn better than many parts of the country but is still feeling the strain of the economy. The Springfield metro workforce has grown more than 18 percent in the past 10 years and in 2004 accounted for more than one-third of Missouri's total job growth. Prior to the current economic downturn, the area's unemployment rate has been below 4.5 percent for over ten years. In the Springfield metro area, 95 percent of businesses have fewer than 50 employees. Springfield's 6.9 percent unemployment level is below the national and state averages of 8.9 percent and 8.1 percent, respectively. Principle industries in Springfield include agriculture, educational and health services, and manufacturing.

We reviewed one recent community contact in this AA to obtain a profile of the community, identify community development needs and opportunities, and to assess perceptions of the performance of local financial institutions. The contact stated that the area has a very competitive lending market with financial institutions showing a real interest in community development and redevelopment. However, the poor economy has limited many of the institutions to lend. The contact stated that there is a continuing need for small and mid-size business operating and fixed asset loans. Opportunities to participate in community development activities are available in this AA.

State of Kansas: Wichita MA

Demographic Information for Full Scope Area: Wichita KS						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	131	3.82	30.53	39.69	25.95	0.00
Population by Geography	512,351	2.34	26.23	44.99	26.44	0.00
Owner-Occupied Housing by Geography	133,462	1.23	20.24	48.74	29.79	0.00
Business by Geography	37,626	2.42	27.43	42.30	27.85	0.00
Farms by Geography	1,114	0.99	10.86	59.52	28.64	0.00
Family Distribution by Income Level	134,881	17.83	18.88	24.21	39.08	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	49,519	3.98	39.14	44.77	12.10	0.00
Median Family Income		51,478	Median Housing Value	79,672		
HUD Adjusted Median Family Income for 2008		59,300	Unemployment Rate	2.38%		
Households Below Poverty Level		9%	(2000 US Census)			

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census and 2008 HUD updated MFI

The Wichita, Kansas AA consists of the following two contiguous counties: Butler, and Sedgwick. This AA complies with the regulation and does not arbitrarily exclude any LMI areas. The AA has 131 census tracts, which are designated 4 percent low-income, 31 percent moderate-income, 40 percent middle-income, 26 percent upper-income, and no NA. Poverty level in this area is at 9 percent. See the table above for additional information about LMI tracts in AA.

Based on information from industry economic information, Wichita has fallen into a recession along with the whole nation because of widespread layoffs in the aerospace industry and weak consumer spending. However, some economists see Wichita's outlook as bright due to its favorable manufacturing composition, low cost of doing business, affordable housing, and well-educated population. The unemployment rate at 6.7 percent is below the national average of 8.9 percent, and slightly above the state rate of 6.4 percent. Wichita's largest employer is in the Aerospace Product and Parts manufacturing, along with services and government. Major corporations in the AA are Cessna Aircraft Company, Spirit Aero systems Inc., and Hawker Beechcraft.

We reviewed one recent community contact in this AA to obtain a profile of the community, identify community development needs and opportunities, and to assess perceptions of the performance of local financial institutions. The community contact identified that the economy is static in respect to significant layoffs in the aircraft industry; but the small business sector is growing in response to recent layoffs, so there is a need for small business loans. The contact rates the performance of banks in the area as excellent and did not identify any financial institutions as needing to increase participation or failing to meet the needs of small businesses. Opportunities are readily available for community development activities.

State of Illinois: Peoria MA

Demographic Information for Full Scope Area: Peoria IL						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	87	11.49	12.64	57.47	18.39	0.00
Population by Geography	347,387	6.22	13.03	59.85	20.89	0.00
Owner-Occupied Housing by Geography	98,188	3.30	10.41	64.42	21.87	0.00
Business by Geography	20,832	9.51	12.14	56.01	22.33	0.00
Farms by Geography	1,461	0.68	2.46	79.33	17.52	0.00
Family Distribution by Income Level	93,132	18.93	18.48	23.85	38.74	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	34,843	11.41	17.88	58.84	11.86	0.00
Median Family Income		52,122	Median Housing Value		90,478	
HUD Adjusted Median Family Income for 2008		63,400	Unemployment Rate		2.41%	
Households Below Poverty Level		9%	(2000 US Census)			

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

Source: 2000 US Census and 2008 HUD updated MFI

The Peoria AA consists of the following three contiguous counties: Peoria, Tazewell, and Woodford. This AA complies with the regulation and does not arbitrarily exclude any LMI areas. The AA has 87 census tracts, which are designated 11 percent low-income, 13 percent moderate-income, 57 percent middle-income, 18 percent upper-income, and no NA. The poverty level for this AA is at 9 percent. See the above table for additional information about LMI tracts in AA.

Based on information from industry economic information, Peoria is enduring the recession along with the rest of the country. Unemployment is equivalent to the national average of 8.9 percent, and below the state rate of 9.4 percent, with major employers implementing cost-cutting measures. Peoria's largest industries are services, manufacturing, and government. Farm production and livestock sales in the three-county area are among the highest in the nation. There is one core employer Caterpillar Inc. with Methodist Medical Center and Keystone Steel and Wire Company as major employers.

We performed one community contact in this AA to obtain a profile of the community, identify community development needs and opportunities, and to assess perceptions of the performance of local financial institutions. Opportunities to participate in community development activities are available in this AA and most banks in the area are willing to actively support the community and help provide small business loan programs. However, the contact still sees the need for more small and mid-size business lending.

State of Oklahoma: Tulsa MA

Demographic Information for Full Scope Area: Tulsa OK						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	172	4.07	25.58	35.47	34.88	0.00
Population by Geography	563,299	2.72	24.16	38.71	34.41	0.00
Owner-Occupied Housing by Geography	140,131	1.49	19.28	39.59	39.63	0.00
Business by Geography	47,878	1.43	22.84	36.03	39.71	0.00
Farms by Geography	780	0.77	18.08	39.74	41.41	0.00
Family Distribution by Income Level	148,189	18.98	17.50	20.90	42.62	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	54,057	5.27	37.24	40.56	16.93	0.00
Median Family Income		45,678	Median Housing Value	91,995		
HUD Adjusted Median Family Income for 2008		54,700	Unemployment Rate	2.46%		
Households Below Poverty Level		11%	(2000 US Census)			

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

Source: 2000 US Census and 2008 HUD updated MFI

The Tulsa Oklahoma AA includes Tulsa County, which is the only county in the MA. This AA complies with the regulation and does not arbitrarily exclude any LMI areas. The AA has 172 census tracts, which are designated 4 percent low-income, 26 percent moderate-income, 35 percent middle-income, 35 percent upper-income, and no NA. The City of Tulsa is the county seat of Tulsa County, which is the most densely populated county in Oklahoma. Tulsa is located in the northeastern corner of Oklahoma. Poverty level in this area is at 11 percent. See the table above for additional information about LMI tracts in AA.

Based on information from industry economic information, the Tulsa economy is trading water. Compared to the rest of the state, the national slowdown has been more painful for the Tulsa area. The weakest link is most evident in industrial production and manufacturing. The unemployment level is below the national average of 8.9 percent at 6.3 percent and slightly above the state rate of 6.2 percent; however, the short-term outlook for Tulsa has been downgraded, given darkening prospects for manufacturers. The long-term outlook is for Tulsa to perform above average as it continues to attract new firms and becomes more diverse. The largest industries in Tulsa are manufacturing, services, and government. Major employers include American Airlines, Bank of Oklahoma, and Cingular Wireless.

We reviewed one recent community contact in this AA to obtain a profile of the community, identify community development needs and opportunities and to assess perceptions of the performance of local financial institutions. The contact did not identify any unmet credit needs in the community and thought, to the extent possible, area financial institutions are actively involved in meeting the credit needs of the community. Opportunities to participate in community development activities are limited in this AA.

State of Colorado: Denver-Aurora MA

Demographic Information for Full Scope Area: Denver-Aurora CO						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	340	6.18	35.88	39.41	17.65	0.88
Population by Geography	1,391,016	7.15	36.72	40.20	15.74	0.19
Owner-Occupied Housing by Geography	341,330	3.15	30.93	45.32	20.60	0.00
Business by Geography	152,147	6.08	30.57	38.96	23.19	1.20
Farms by Geography	2,049	3.42	28.89	47.00	19.96	0.73
Family Distribution by Income Level	335,235	22.44	20.87	23.64	33.04	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	145,216	10.67	49.23	33.72	6.37	0.00
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below Poverty Level		61,301 71,800 9%	Median Housing Value Unemployment Rate (2000 US Census)		168,845 2.47%	

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

Source: 2000 US Census and 2008 HUD updated MFI

The Colorado Denver-Aurora AA includes Adams, Denver and runs along the Arapahoe County. This AA complies with the regulation and does not arbitrarily exclude any LMI areas. The AA has 340 census tracts, which are designated 6 percent low-income, 36 percent moderate-income, 40 percent middle-income, 18 percent upper-income, and 1 percent NA. The poverty level is at 9 percent. See the table above for additional information about LMI tracts in AA. The branch was primarily a commercial lender at the time of purchase in 2007, and continues to perform well in this area.

Based on information from industry economic reports, the economic conditions are dwindling. The national recession and credit crunch has pulled Denver into the recession, but its core industries retain their long-run strength despite short-term woes. As the national average unemployment rate continues to rise, Denver-Aurora AA is below the national average of 8.9 percent at 8.2 percent, compared to the state of Colorado at 7.4 percent. Denver's largest employers are service, government, and retail. Major corporations in the AA are Qwest Communications International, Inc, King Soopers, and Health ONE. Identified community credit needs include small business loans and visible support and leadership from some of the larger banks management.

We reviewed two recent community contacts in this AA to obtain a profile of the community, identify community development needs and opportunities, and to assess perceptions of the performance of local financial institutions. Opportunities to participate in community development activities are available in this AA and most banks in the area are willing to actively support the community and help provide small business loan programs. The contacts identified affordable housing and business lending as the areas primary credit needs. One stated the Colorado market would benefit from visible support and leadership from some of the larger bank's headquarters management.

Appendix D: Tables of Performance Data

Content of Standardized Tables

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: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geo-coded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geo-coded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the

percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 3. Geographic Distribution of Home Improvement Loans - See Table 2.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans - See Table 2.

Table 5. Geographic Distribution of Multifamily Loans - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

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

Table 7. Geographic Distribution of Small Loans to Farms - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table 8. Borrower Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

Table 9. Borrower Distribution of Home Improvement Loans - See Table 8.

- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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.

Institution ID: COMMERCE BANK, N.A.

Table 1. Lending Volume

LENDING VOLUME 2008		Geography: COMMERCE BANK, N.A.						Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31,				
MA/Assessment Area (2008):	% 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)	
Multistate MA:												
Full Scope: #41180 St Louis MO-IL	100.00	4,059	384,968	7,650	943,086	25	2,358	44	65,015	11,778	1,395,427	100.00
Full Scope: #28140 Kansas City KS-MO	100.00	2,782	268,361	5,457	564,832	200	9,912	70	174,789	8,509	1,017,894	100.00
State of Missouri:												
Full Scope: #44180 Springfield MA	22.34	1,348	143,337	1,998	294,571	970	56,556	31	49,275	4,347	543,739	34.58
Limited Scope #41140 St Joseph MA	12.15	971	83,748	1,264	160,527	128	8,360	1	1,225	2,364	253,860	12.68
#17860 Columbia MA	10.02	870	107,548	996	107,720	75	5,708	9	1,541	1,950	222,517	11.44
#27900 Joplin MA	4.64	380	52,778	467	68,551	49	4,856	6	6,439	902	132,624	6.80
#27620 California Tipton MA	4.68	211	12,873	328	25,150	373	21,404	0	0	912	59,427	3.22
NonMA MO Combined (8 AAs)	46.17	2,247	181,200	4,447	342,783	2,278	135,116	14	3,608	8,986	662,707	31.27

* Loan Data as of December 31, 2008. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from April 04, 2005 to August 03, 2009.

*** Deposit Data as of June 30, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: COMMERCE BANK, N.A.

Table 1. Lending Volume (continued)

LENDING VOLUME		Geography: COMMERCE BANK, N.A.						Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2008				
MA/Assessment Area (2008):	% 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)	
State of Kansas:												
Full Scope: #48620 Wichita MA	27.59	453	38,387	1,277	208,426	191	14,219	23	54,490	1,944	315,522	70.83
Limited Scope: #29940 Lawrence MA	7.18	239	28,150	245	18,761	10	422	12	52,858	506	100,191	9.14
NonMA KS combined (5 AAs)	65.22	1,068	107,434	2,055	177,111	1,445	120,204	27	14,957	4,595	419,706	20.03
State of Illinois:												
Full Scope: #37900 Peoria MA	47.49	418	38,946	789	114,478	276	25,133	30	22,764	1,513	201,321	50.33
Limited Scope: #14060 Bloomington MA	50.63	344	40,180	796	130,214	467	50,086	6	3,117	1,613	223,597	48.01
#16580 Champaign MA	1.88	19	4,700	35	7,547	6	988	0	0	60	13,235	1.66
State of Oklahoma:												
Full Scope: #46140 Tulsa MA	100.00	52	11,365	322	56,789	3	115	2	3,350	379	71,619	100.00
State of Colorado:												
Full Scope: #19740 Denver-Aurora MA	100.00	40	5,314	128	24,248	1	50	6	8,120	175	37,732	100.00

* Loan Data as of December 31, 2008. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from April 04, 2005 to August 03, 2009.

*** Deposit Data as of June 30, 2008. 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: COMMERCE BANK, N.A.				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2008					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						
Multistate MA:																
Full Scope: #41180 St Louis MO-IL	821	100.00	3.29	1.95	17.20	11.57	48.91	46.16	30.60	40.32	0.30	0.15	0.18	0.27	0.40	
Full Scope: #28140 Kansas City KS-N	663	100.00	3.26	0.30	16.01	9.50	46.53	45.40	34.20	44.80	0.27	0.00	0.24	0.26	0.30	
State of Missouri																
Full Scope: #44180 Springfield MA	469	22.45	0.04	0.43	17.71	14.93	52.65	51.81	29.60	32.84	0.86	8.33	0.64	0.81	1.03	
Limited Scope #41140 St Joseph MA	334	15.99	0.00	0.00	9.14	7.78	58.32	38.92	32.55	53.29	4.20	0.00	1.82	3.03	6.69	
#17860 Columbia MA	380	18.19	1.83	2.89	10.60	12.89	59.18	55.00	28.39	29.21	2.23	4.17	2.37	1.97	2.53	
#27900 Joplin MA	133	6.37	0.00	0.00	8.10	12.78	84.22	75.19	7.68	12.03	0.90	0.00	0.69	0.88	1.55	
#27620 California Tipton	64	3.06	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	8.00	0.00	0.00	8.00	0.00	
NonMA MO Combined (8	709	33.94	0.00	0.00	4.39	9.45	74.51	65.87	21.10	24.68	2.14	0.00	6.12	2.10	1.81	
State of Kansas:																
Full Scope: #48620 Wichita MA	164	23.16	1.23	0.00	20.24	15.24	48.74	48.78	29.79	35.98	0.01	0.00	0.00	0.01	0.00	
Limited Scope: #22940 Lawrence MA	111	15.68	0.11	0.00	19.97	14.41	49.84	40.54	30.08	45.05	0.78	0.00	0.93	0.71	0.78	
NonMA KS combined (5 A	433	61.16	0.00	0.00	10.00	6.70	64.21	60.28	25.79	33.03	1.33	0.00	0.87	1.72	0.77	

* Based on 2007 Peer Mortgage Data (Western)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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

Table 2. Geographic Distribution of Home Purchase Loans (continued)

Geographic Distribution: HOME PURCHASE			Geography: COMMERCE BANK, N.A.				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2008					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						
State of Illinois																
Full Scope: #37900 Peoria MA	124	58.49	3.30	0.00	10.41	9.68	64.42	52.42	21.87	37.90	0.46	0.00	0.25	0.43	0.61	
Limited Scope: #14060 Bloomington MA	80	37.74	0.00	0.00	21.24	21.25	55.27	48.75	23.49	30.00	0.51	0.00	0.48	0.59	0.43	
#16580 Champaign MA	8	3.77	0.91	0.00	18.58	12.50	52.37	50.00	28.13	37.50	0.04	0.00	0.00	0.04	0.07	
State of Oklahoma																
Full Scope: #46140 Tulsa MA	29	100.00	1.49	0.00	19.28	0.00	39.59	6.90	39.63	93.10	0.10	0.00	0.00	0.00	0.19	
State of Colorado																
Full Scope: #19740 Denver-Aurora MA	24	100.00	3.15	12.50	30.93	54.17	45.32	20.83	20.60	12.50	0.02	0.00	0.06	0.01	0.00	

* Based on 2007 Peer Mortgage Data (Western)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: COMMERCE BANK, N.A.				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement 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						
Multistate MA:																
Full Scope: #41180 St Louis MO-IL	1,246	100.00	3.29	2.09	17.20	15.49	48.91	52.65	30.60	29.78	3.12	1.04	2.89	2.93	3.86	
Full Scope: #28140 Kansas City KS-	913	100.00	3.26	2.41	16.01	13.58	46.53	46.55	34.20	37.46	3.79	2.92	3.46	4.21	3.44	
State of Missouri:																
Full Scope: #44180 Springfield MA	209	22.94	0.04	0.00	17.71	20.57	52.65	55.50	29.60	23.92	6.89	0.00	8.24	7.20	5.57	
Limited Scope #41140 St Joseph MA	165	18.11	0.00	0.00	9.14	13.94	58.32	51.52	32.55	34.55	8.98	0.00	8.33	9.16	8.77	
#17860 Columbia MA	84	9.22	1.83	2.38	10.60	11.90	59.18	61.90	28.39	23.81	6.93	0.00	8.33	6.28	9.33	
#27900 Joplin MA	65	7.14	0.00	0.00	8.10	10.77	84.22	75.38	7.68	13.85	2.79	0.00	2.27	2.70	5.00	
#27620 California Tipton	44	4.83	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	21.88	0.00	0.00	21.88	0.00	
NonMA MO Combined (5 A	344	37.76	0.00	0.00	4.39	9.01	74.51	66.28	21.10	24.71	7.46	0.00	25.00	6.37	8.78	
State of Kansas:																
Full Scope: #48620 Wichita MA	140	46.05	1.23	0.71	20.24	15.71	48.74	57.86	29.79	25.71	0.00	0.00	0.00	0.00	0.00	
Limited Scope: #22940 Lawrence MA	29	9.54	0.11	0.00	19.97	24.14	49.84	58.62	30.08	17.24	4.21	0.00	3.51	6.21	1.20	
NonMA KS combined (5 A	135	44.41	0.00	0.00	10.00	9.63	64.21	64.44	25.79	25.93	2.51	0.00	0.00	3.61	1.38	

* Based on 2007 Peer Mortgage Data (Western)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans (continued)

Geographic Distribution: HOME IMPROVEMENT 2008		geography: COMMERCE BANK, N.A.								Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31,					
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
State of Illinois:															
Full Scope: #37900 Peoria MA	82	56.94	3.30	2.44	10.41	21.95	64.42	51.22	21.87	24.39	2.17	0.00	1.42	2.54	1.72
Limited Scope: #14060 Bloomington MA	61	42.36	0.00	0.00	21.24	18.03	55.27	60.66	23.49	21.31	3.96	0.00	5.48	4.86	1.50
#16580 Champaign MA	1	0.69	0.91	0.00	18.58	0.00	52.37	100.00	28.13	0.00	0.00	0.00	0.00	0.00	0.00
State of Oklahoma:															
Full Scope: #46140 Tulsa MA	0	100.0 0	1.49	0.00	19.28	0.00	39.59	0.00	39.63	0.00	0.00	0.00	0.00	0.00	0.00
State of Colorado:															
Full Scope: #19740 Denver-Aurora MA	2	100.0 0	3.15	0.00	30.93	50.00	45.32	50.00	20.60	0.00	0.05	0.00	0.11	0.06	0.00

* Based on 2007 Peer Mortgage Data (Western)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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

COMMERCE BANK, N.A.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: COMMERCE BANK, N.A.					Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2008				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Multistate MA:																								
Full Scope: #41180 St Louis MO-IL	1,959	100.00	3.29	0.77	17.20	11.03	48.91	51.56	30.60	36.65	0.62	0.18	0.40	0.66	0.71									
Full Scope: #28140 Kansas City KS-MO	1,196	100.00	3.26	1.84	16.01	10.03	46.53	49.08	34.20	39.05	0.61	0.26	0.50	0.64	0.64									
State of Missouri:																								
Full Scope: #44180 Springfield MA	667	22.24	0.04	0.15	17.71	15.89	52.65	56.97	29.60	26.99	1.35	0.00	1.67	1.48	0.97									
Limited Scope #41140 St Joseph MA	467	15.57	0.00	0.00	9.14	12.42	58.32	44.33	32.55	43.25	3.67	0.00	5.83	2.80	4.58									
#17860 Columbia MA	403	13.44	1.83	2.48	10.60	7.94	59.18	66.25	28.39	23.33	3.98	6.52	4.69	4.02	3.48									
#27900 Joplin MA	179	5.97	0.00	0.00	8.10	13.41	84.22	68.72	7.68	17.88	1.42	0.00	1.84	1.28	2.58									
#27620 California Tipton MA	102	3.40	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	10.63	0.00	0.00	10.63	0.00									
NonMA MO Combined (8)	1,181	39.38	0.00	0.00	4.39	11.18	74.51	64.86	21.10	23.96	3.80	0.00	13.79	3.37	3.87									
State of Kansas:																								

* Based on 2007 Peer Mortgage Data (Western)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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

Charter Number: 18112

Full Scope: #48620 Wichita MA	146	20.03	1.23	1.37	20.24	11.64	48.74	45.21	29.79	41.78	0.01	0.00	0.00	0.00	0.03
Limited Scope: #22940 Lawrence MA	99	13.58	0.11	0.00	19.97	18.18	49.84	36.36	30.08	45.45	0.78	0.00	0.74	0.82	0.74
NonMA KS combined (5 A	484	66.39	0.00	0.00	10.00	9.50	64.21	61.78	25.79	28.72	1.96	0.00	2.18	1.94	1.96

Table 4. Geographic Distribution of Home Mortgage Refinance Loans (continued)

Geographic Distribution: HOME MORTGAGE REFINANCE 2008			geography: COMMERCE BANK, N.A.				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance 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						
State of Illinois:																
Full Scope: #37900 Peoria MA	207	50.49	3.30	1.45	10.41	12.08	64.42	51.21	21.87	35.27	1.12	2.11	0.71	0.83	1.99	
Limited Scope: #14060 Bloomington MA	194	47.32	0.00	0.00	21.24	14.95	55.27	53.61	23.49	31.44	1.01	0.00	0.99	1.04	0.97	
#16580 Champaign MA	9	2.19	0.91	0.00	18.58	11.11	52.37	22.22	28.13	66.67	0.17	0.00	0.00	0.06	0.56	
State of Oklahoma:																
Full Scope: #46140 Tulsa MA	23	100.00	1.49	0.00	19.28	0.00	39.59	34.78	39.63	65.22	0.12	0.00	0.00	0.03	0.23	
State of Colorado:																
Full Scope: #19740 Denver-Aurora MA	11	10.00	3.15	9.09	30.93	45.45	45.32	36.36	20.60	9.09	0.01	0.00	0.02	0.01	0.01	

* Based on 2007 Peer Mortgage Data (Western)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: COMMERCE BANK, N.A.				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans*** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Multistate MA:																
Full Scope: #41180 St Louis MO-IL	33	100.00	10.86	3.03	20.33	18.18	47.16	45.45	21.64	33.33	2.28	3.33	0.83	2.79	3.08	
Full Scope: #28140 Kansas City KS-MO	9	100.00	7.27	0.00	27.77	22.22	45.97	66.67	18.99	11.11	1.04	0.00	0.00	2.15	0.00	
State of Missouri:																
Full Scope: #44180 Springfield MA	3	10.71	7.91	0.00	20.92	0.00	52.62	33.33	18.55	66.67	1.45	0.00	0.00	2.27	0.00	
Limited Scope #41140 St Joseph MA	5	17.86	0.00	0.00	28.41	0.00	31.01	0.00	40.59	100.00	0.00	0.00	0.00	0.00	0.00	
#17860 Columbia MA	3	10.71	26.68	0.00	30.14	33.33	16.38	66.67	26.79	0.00	6.25	0.00	0.00	20.00	0.00	
#27900 Joplin MA	3	10.71	0.00	0.00	33.32	0.00	59.26	33.33	7.41	66.67	0.00	0.00	0.00	0.00	0.00	
#27620 California Tipton MA	1	3.57	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
NonMA MO Combined (8 MA)	13	46.43	0.00	0.00	8.25	0.00	77.90	53.85	13.85	46.15	2.44	0.00	0.00	0.00	16.67	
State of Kansas:																
Full Scope: #48620 Wichita MA	3	15.79	4.14	0.00	32.41	66.67	43.01	33.33	20.44	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Scope: #22940 Lawrence MA	0	0.00	10.24	0.00	34.66	0.00	37.90	0.00	17.20	0.00	0.00	0.00	0.00	0.00	0.00	
NonMA KS combined (5 MA)	16	84.21	0.00	0.00	17.15	6.25	54.23	87.50	28.62	6.25	0.00	0.00	0.00	0.00	0.00	

* Based on 2007 Peer Mortgage Data (Western)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans (continued)

Geographic Distribution: MULTIFAMILY 2008		Geography: COMMERCE BANK, N.A.								Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31,					
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans***	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
State of Illinois:															
Full Scope: #37900 Peoria MA	5	33.33	14.88	0.00	15.00	0.00	44.20	20.00	25.92	80.00	0.00	0.00	0.00	0.00	0.00
Limited Scope: #14060 Bloomington M	9	60.00	2.12	0.00	36.51	33.33	54.30	44.44	7.07	22.22	7.94	0.00	16.67	2.94	14.29
#16580 Champaign MA	1	6.67	17.66	100.00	45.23	0.00	21.61	0.00	15.50	0.00	0.00	0.00	0.00	0.00	0.00
State of Oklahoma:															
Full Scope: #46140 Tulsa MA	0	100.00	3.71	0.00	25.03	0.00	39.55	0.00	31.71	0.00	0.00	0.00	0.00	0.00	0.00
State of Colorado:															
Full Scope: #19740 Denver- Aurora MA	3	100.00	10.91	66.67	42.48	33.33	40.77	0.00	5.84	0.00	0.27	1.52	0.00	0.00	0.00

* Based on 2007 Peer Mortgage Data (Western)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: COMMERCE BANK, N.A.				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2008					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						
Multistate MA:																
Full Scope: #41180 St Louis MO-IL	7,615	100.00	5.17	3.45	18.51	13.15	43.10	44.62	32.89	38.78	2.33	2.06	2.31	2.48	2.24	
Full Scope: #28140 Kansas City KS-N	5,416	100.00	4.39	2.62	17.33	15.99	43.10	40.73	34.15	40.66	1.90	1.73	2.44	1.93	1.81	
State of Missouri:																
Full Scope: #44180 Springfield MA	1,998	21.03	2.99	2.90	19.29	17.17	51.23	51.70	26.49	28.23	3.26	5.40	3.20	3.73	2.83	
Limited Scope #41140 St Joseph MA	1,264	13.31	0.00	0.00	16.68	18.75	45.37	31.01	37.95	50.24	9.90	0.00	13.68	6.85	12.08	
#17860 Columbia MA	996	10.48	18.53	17.77	15.26	12.05	44.23	44.48	21.99	25.70	4.94	5.77	5.76	5.30	3.75	
#27900 Joplin MA	467	4.92	0.00	0.00	15.01	29.12	77.12	53.53	7.87	17.34	2.06	0.00	3.65	1.61	3.94	
#27620 California Tipton	328	3.45	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	17.93	0.00	0.00	18.40	0.00	
NonMA MO Combined (8	4,447	46.81	0.00	0.00	5.67	9.51	77.49	70.23	16.84	20.26	7.55	0.00	13.57	7.52	8.02	
State of Kansas:																
Full Scope: #48620 Wichita MA	1,277	35.70	2.42	2.51	27.43	29.44	42.30	39.55	27.85	28.50	0.57	0.71	0.64	0.58	0.52	
Limited Scope: #22940 Lawrence MA	245	6.85	2.08	0.41	25.31	23.27	46.53	45.31	26.08	31.02	1.58	0.00	1.52	1.80	1.45	
NonMA KS combined (5	2,055	57.45	0.00	0.00	16.82	13.09	61.03	62.92	22.14	23.99	2.32	0.00	3.96	2.30	1.84	

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2008).

Table 6. Geographic Distribution of Small Loans to Businesses (continued)

Geographic Distribution: SMALL LOANS TO BUSINESSES															geography: COMMERCE BANK, N.A.					Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2008				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
State of Illinois:																								
Full Scope: #37900 Peoria MA	789	48.73	9.51	18.38	12.14	12.04	56.01	43.60	22.33	25.98	1.96	4.81	2.67	1.46	2.27									
Limited Scope: #14060 Bloomington MA	796	49.17	0.58	1.26	23.62	20.35	59.57	53.77	16.22	24.62	3.20	8.70	3.26	3.01	3.79									
#16580 Champaign MA	34	2.10	4.91	0.00	28.22	17.65	43.81	55.88	20.92	26.47	0.14	0.00	0.14	0.19	0.13									
State of Oklahoma:																								
Full Scope: #46140 Tulsa MA	322	100.00	1.43	0.31	22.84	13.35	36.03	18.01	39.71	68.32	0.52	0.00	0.22	0.24	0.87									
State of Colorado:																								
Full Scope: #19740 Denver-Aurora MA	123	100.00	6.08	5.69	30.57	43.09	38.96	24.39	23.19	26.83	0.04	0.02	0.06	0.03	0.03									

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2008).

Institution ID: COMMERCE BANK, N.A.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: COMMERCE BANK, N.A.				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms**	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans						
Multistate MA:																
Full Scope: #41180 St Louis MO-IL	25	100.00	1.34	0.00	9.78	0.00	62.15	56.00	26.63	44.00	0.57	0.00	0.00	0.26	1.77	
Full Scope: #28140 Kansas City KS-MO	200	100.00	1.82	1.00	10.46	1.50	52.79	73.00	34.73	24.50	11.98	0.00	5.56	14.85	9.45	
State of Missouri:																
Full Scope: #44180 Springfield MA	970	25.05	0.38	0.00	18.43	14.64	60.21	80.00	20.98	5.36	42.93	0.00	47.69	43.92	31.91	
Limited Scope #41140 St Joseph MA	128	3.30	0.00	0.00	2.17	0.78	65.87	46.88	31.96	52.34	15.84	0.00	0.00	11.64	25.35	
#17860 Columbia MA	75	1.94	5.20	0.00	8.14	14.67	73.98	76.00	12.67	9.33	9.70	0.00	50.00	8.91	8.33	
#27900 Joplin MA	49	1.26	0.00	0.00	4.07	0.00	93.10	100.00	2.83	0.00	6.64	0.00	0.00	7.00	0.00	
#27620 California Tipton MA	373	9.63	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	39.68	0.00	0.00	39.68	0.00	
NonMA MO Combined (8 MA)	2,278	58.82	0.00	0.00	1.32	0.13	78.53	88.81	20.15	11.06	38.38	0.00	14.29	38.31	44.53	
State of Kansas:																
Full Scope: #48620 Wichita MA	191	11.60	0.99	0.00	10.86	4.71	59.52	79.06	28.64	16.23	0.30	0.00	0.00	0.00	1.28	
Limited Scope: #22940 Lawrence MA	10	0.61	0.00	0.00	12.07	0.00	57.24	20.00	30.69	80.00	2.78	0.00	0.00	0.00	7.14	
NonMA KS combined (5 MA)	1,445	87.79	0.00	0.00	4.54	1.38	74.11	87.61	21.36	11.00	16.95	0.00	8.33	21.14	2.14	

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2008).

Table 7. Geographic Distribution of Small Loans to Farms (continued)

Geographic Distribution: SMALL LOANS TO FARMS 2008			Geography: COMMERCE BANK, N.A.								Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31,				
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
State of Illinois:															
Full Scope: #37900 Peoria MA	276	36.85	0.68	0.00	2.46	1.09	79.33	86.23	17.52	12.68	12.10	0.00	10.00	11.69	18.00
Limited Scope: #14060 Bloomington MA	467	62.35	0.00	0.00	6.42	2.14	73.09	71.73	20.49	26.12	22.11	0.00	12.00	19.84	36.14
#16580 Champaign MA	6	0.80	0.72	0.00	6.94	0.00	82.30	50.00	9.81	50.00	0.95	0.00	0.00	0.00	13.33
State of Oklahoma:															
Full Scope: #46140 Tulsa MA	3	100.00	0.77	0.00	18.08	0.00	39.74	33.33	41.41	66.67	2.30	0.00	0.00	0.00	4.44
State of Colorado:															
Full Scope: #19740 Denver-Aurora MA	1	100.00	3.42	0.00	28.89	0.00	47.00	100.00	19.96	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2008).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: COMMERCE BANK, N.A.						Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2008							
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****	% Families6	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Multistate MA:															
Full Scope: #41180 St Louis MO-IL	821	100.00	19.23	13.11	17.95	20.93	22.22	21.44	40.60	44.51	0.34	0.42	0.28	0.27	0.39
Full Scope: #28140 Kansas City KS-N	663	100.00	18.02	10.03	18.47	20.22	23.54	23.15	39.97	46.60	0.31	0.25	0.31	0.24	0.36
State of Missouri:															
Full Scope: #44180 Springfield MA	469	22.45	17.32	12.11	19.29	23.57	24.01	19.82	39.38	44.49	0.95	0.73	1.03	0.77	1.07
Limited Scope #41140 St Joseph MA	334	15.99	18.15	8.26	18.03	21.41	23.78	26.91	40.04	43.43	4.61	1.43	3.85	6.24	5.11
#17860 Columbia MA	380	18.19	19.11	13.26	17.92	26.80	22.87	22.65	40.10	37.29	2.27	2.38	2.16	2.43	2.22
#27900 Joplin MA	133	6.37	17.53	7.14	19.46	26.19	24.59	21.43	38.41	45.24	0.95	0.53	1.48	0.73	0.90
#27620 California Tipton	64	3.06	21.89	35.48	21.68	17.74	29.77	29.03	26.66	17.74	8.29	10.17	0.00	11.43	12.90
NonMA MO Combined (8	709	33.94	17.60	7.13	17.64	21.69	22.95	23.77	41.80	47.40	2.28	1.25	2.44	2.86	2.08
State of Kansas:															

* Based on 2007 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 3.7% of loans originated and purchased by bank.

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

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

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

Charter Number: 18112

Full Scope: #48620 Wichita MA	164	23.16	17.83	13.75	18.88	15.00	24.21	18.13	39.08	53.13	0.01	0.00	0.00	0.03	0.00
Limited Scope: #22940 Lawrence MA	111	15.68	18.17	8.33	18.89	16.67	24.70	27.78	38.24	47.22	0.79	1.34	1.74	0.18	0.62
NonMA KS combined (5 A	433	61.16	18.42	7.69	19.69	18.99	24.08	25.48	37.81	47.84	1.49	1.38	1.13	1.60	1.60

Table 8. Borrower Distribution of Home Purchase Loans (continued)

Borrower Distribution: HOME PURCHASE 2008			Geography: COMMERCE BANK, N.A.				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31,					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans****	% Families7	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
State of Illinois:																
Full Scope: #37900 Peoria MA	124	58.49	18.93	13.33	18.48	14.17	23.85	24.17	38.74	48.33	0.49	0.49	0.42	0.42	0.60	
Limited Scope: #14060 Bloomington	80	37.74	17.41	10.39	18.87	18.18	26.57	18.18	37.15	53.25	0.59	0.55	0.53	0.29	0.85	
#16580 Champaign N	8	3.77	18.12	0.00	18.34	12.50	24.52	25.00	39.02	62.50	0.05	0.00	0.00	0.09	0.06	
State of Oklahoma:																
Full Scope: #46140 Tulsa MA	29	100.00	18.98	0.00	17.50	0.00	20.90	7.69	42.62	92.31	0.09	0.00	0.00	0.05	0.16	
State of Colorado:																
Full Scope: #19740 Denver- Aurora MA	24	100.00	22.44	18.75	20.87	12.50	23.64	12.50	33.04	56.25	0.02	0.02	0.01	0.01	0.04	

* Based on 2007 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 3.7% of loans originated and purchased by bank.

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

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

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 2008		Geography: COMMERCE BANK, N.A.								Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31,					
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 ⁸	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Multistate MA:															
Full Scope: #41180 St Louis MO-IL	1,246	100.00	19.23	15.29	17.95	22.08	22.22	27.47	40.60	35.16	3.21	3.78	3.77	2.81	3.02
Full Scope: #28140 Kansas City KS-N	914	100.00	18.02	10.80	18.47	21.05	23.54	28.62	39.97	39.53	3.92	3.43	3.53	4.46	3.87
State of Missouri:															
Full Scope: #44180 Springfield MA	209	22.94	17.32	14.35	19.29	25.36	24.01	25.84	39.38	34.45	7.19	13.68	8.29	6.10	5.85
Limited Scope #41140 St Joseph MA	165	18.11	18.15	10.49	18.03	17.90	23.78	22.84	40.04	48.77	9.45	7.14	13.89	5.93	10.74
#17860 Columbia MA	84	9.22	19.11	13.25	17.92	14.46	22.87	26.51	40.10	45.78	7.01	10.00	1.59	7.78	8.39
#27900 Joplin MA	65	7.14	17.53	12.31	19.46	9.23	24.59	26.15	38.41	52.31	2.91	3.57	0.87	1.81	4.27
#27620 California Tipton MA	44	4.83	21.89	16.67	21.68	26.19	29.77	42.86	26.66	14.29	20.63	16.67	21.05	23.53	20.00
NonMA MO Combined (8	344	37.76	17.60	9.91	17.64	19.53	22.95	26.82	41.80	43.73	8.24	12.12	5.02	10.44	8.03

* Based on 2007 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 1.6% of loans originated and purchased by bank.

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

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

⁸ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans (continued)

Borrower Distribution: HOME IMPROVEMENT 2008			Geography: COMMERCE BANK, N.A.								Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31,				
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 ⁹	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
State of Kansas:															
Full Scope: #48620 Wichita MA	140	46.05	17.83	12.14	18.88	15.71	24.21	25.00	39.08	47.14	0.00	0.00	0.00	0.00	0.00
Limited Scope: #22940 Lawrence MA	29	9.54	18.17	7.14	18.89	25.00	24.70	42.86	38.24	25.00	4.03	5.00	8.00	5.80	1.49
NonMA KS combined (5)	135	44.41	18.42	6.92	19.69	15.38	24.08	22.31	37.81	55.38	2.60	0.00	0.81	2.96	3.48
State of Illinois:															
Full Scope: #37900 Peoria MA	82	56.94	18.93	16.67	18.48	20.51	23.85	24.36	38.74	38.46	2.04	3.14	1.26	1.47	2.57
Limited Scope: #14060 Bloomington MA	61	42.36	17.41	19.67	18.87	16.39	26.57	19.67	37.15	44.26	4.05	4.35	2.80	5.77	3.74
#16580 Champaign MA	1	0.69	18.12	0.00	18.34	0.00	24.52	0.00	39.02	100.00	0.00	0.00	0.00	0.00	0.00
State of Oklahoma:															
Full Scope: #46140 Tulsa MA	0	100.00	18.98	0.00	17.50	0.00	20.90	0.00	42.62	0.00	0.00	0.00	0.00	0.00	0.00
State of Colorado:															
Full Scope: #19740 Denver-Aurora MA	2	100.00	22.44	0.00	20.87	50.00	23.64	50.00	33.04	0.00	0.06	0.00	0.13	0.10	0.00

* Based on 2007 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 1.6% of loans originated and purchased by bank.

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

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

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

Institution ID: COMMERCE BANK, N.A

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: COMMERCE BANK, N.A.					Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2008					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans**	% Families 10	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****						
Multistate MA:																
Full Scope: #41180 St Louis MO-IL	1,959	100.00	19.23	12.03	17.95	19.71	22.22	23.42	40.60	44.83	0.70	0.88	0.59	0.52	0.84	
Full Scope: #28140 Kansas City KS-MO	1,196	100.00	18.02	11.59	18.47	20.09	23.54	21.24	39.97	47.08	0.68	0.97	0.53	0.58	0.78	
State of Missouri:																
Full Scope: #44180 Springfield	667	22.24	17.32	11.00	19.29	15.37	24.01	25.57	39.38	48.06	1.54	3.03	1.01	1.23	1.66	
Limited Scope #41140 St Joseph MA	467	15.57	18.15	14.29	18.03	18.14	23.78	19.50	40.04	48.07	3.95	5.75	2.52	4.72	3.80	
#17860 Columbia MA	403	13.44	19.11	8.68	17.92	16.53	22.87	25.77	40.10	49.02	3.82	6.52	3.70	3.55	3.68	
#27900 Joplin MA	179	5.97	17.53	4.82	19.46	14.46	24.59	18.67	38.41	62.05	1.46	0.45	0.78	0.90	2.14	
#27620 California Tipton MA	102	3.40	21.89	13.27	21.68	28.57	29.77	34.69	26.66	23.47	11.22	7.41	14.89	11.43	9.62	
NonMA MO Combined (8 AA)	1,181	39.38	17.60	8.57	17.64	16.05	22.95	21.19	41.80	54.19	4.03	5.37	3.23	3.50	4.37	

* Based on 2007 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 5.7% of loans originated and purchased by bank.

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans (continued)

Borrower Distribution: HOME MORTGAGE REFINANCE															geography: COMMERCE BANK, N.A.					Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2008				
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 11	% BANK Loans****	% Families* **	% BANK Loans****	% Families ***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
State of Kansas:																								
Full Scope: #48620 Wichita MA	146	20.03	17.83	8.45	18.88	14.08	24.21	22.54	39.08	54.93	0.01	0.00	0.00	0.05	0.00									
Limited Scope: #22940 Lawrence MA	99	13.58	18.17	2.11	18.89	16.84	24.70	16.84	38.24	64.21	0.88	0.00	0.00	0.42	1.47									
NonMA KS combined (5 AA)	484	66.39	18.42	5.60	19.69	13.58	24.08	21.12	37.81	59.70	1.92	0.00	1.81	1.46	2.37									
State of Illinois:																								
Full Scope: #37900 Peoria MA	207	50.49	18.93	9.42	18.48	15.71	23.85	20.94	38.74	53.93	1.19	1.06	1.02	0.88	1.58									
Limited Scope: #14060 Bloomington MA	194	47.32	17.41	18.82	18.87	17.20	26.57	20.97	37.15	43.01	1.02	3.57	0.72	0.28	1.08									
#16580 Champaign MA	9	2.19	18.12	22.22	18.34	0.00	24.52	11.11	39.02	66.67	0.20	0.00	0.00	0.15	0.36									
State of Oklahoma:																								
Full Scope: #46140 Tulsa MA	23	100.00	18.98	0.00	17.50	0.00	20.90	13.33	42.62	86.67	0.13	0.00	0.00	0.11	0.20									
State of Colorado:																								
Full Scope: #19740 Denver-Aurora MA	11	100.00	22.44	0.00	20.87	20.00	23.64	0.00	33.04	80.00	0.01	0.00	0.01	0.00	0.03									

* Based on 2007 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 5.7% of loans originated and purchased by bank.

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

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

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

Institution ID: COMMERCE BANK, N.A.

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: COMMERCE BANK, N.A.			Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2008				
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
Multistate MA:									
Full Scope: #41180 St Louis MO-IL	7,650	100.00	64.89	62.08	71.16	14.17	14.67	2.33	3.97
Full Scope: #28140 Kansas City KS-N	5,457	100.00	63.79	62.67	77.04	10.90	12.06	1.90	3.34
State of Missouri:									
Full Scope: #44180 Springfield MA	1,998	21.03	60.46	66.57	66.32	15.77	17.92	3.26	5.22
Limited Scope: #41140 St Joseph MA	1,264	13.31	60.27	60.52	68.59	16.77	14.64	9.90	12.76
#17860 Columbia MA	996	10.48	63.00	55.62	72.89	15.56	11.55	4.94	7.24
#27900 Joplin MA	467	4.92	60.44	61.03	66.38	15.63	17.99	2.06	3.29
#27620 California Tipton	328	3.45	52.46	64.02	82.93	11.28	5.79	17.93	21.24
NonMA MO Combined (8	4,447	46.81	56.27	75.35	82.08	11.38	6.54	7.55	13.06
State of Kansas:									

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2008).

**** 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 11.07% of small loans to businesses originated and purchased by the bank.

Full Scope: #48620 Wichita MA	1,277	35.70	57.71	63.82	64.92	14.49	20.60	0.57	1.19
Limited Scope: #22940 Lawrence MA	245	6.85	61.84	68.57	83.27	8.98	7.76	1.58	2.55
NonMA KS combined (5 A	2,055	57.45	54.39	73.09	79.76	12.80	7.45	2.32	3.91

Table11. Borrower Distribution of Small Loans to Businesses (continued)

Borrower Distribution: SMALL LOANS TO BUSINESSES 2008		geography: COMMERCE BANK, N.A.			Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31,				
	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
MA/Assessment Area:	#	% 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
State of Illinois:									
Full Scope: #37900 Peoria MA	789	48.70	63.15	63.12	65.65	18.88	15.46	1.96	3.18
Limited Scope: #14060 Bloomington MA	796	49.14	61.99	68.97	61.81	16.58	21.61	3.20	5.29
#16580 Champaign MA	35	2.16	63.87	54.29	48.57	28.57	22.86	0.14	0.19
State of Oklahoma:									
Full Scope: #46140 Tulsa MA	322	100.00	62.32	48.76	56.21	18.32	25.47	0.52	0.50
State of Colorado:									
Full Scope: #19740 Denver- Aurora MA	128	100.00	63.17	21.09	49.22	28.13	22.66	0.04	0.04

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2008).

**** 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 11.07% of small loans to businesses originated and purchased by the bank.

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: COMMERCE BANK, N.A.			Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2008				
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
Multistate MA:									
Full Scope: #41180 St Louis MO-IL	25	100.00	97.18	80.00	76.00	8.00	16.00	0.57	0.47
Full Scope: #28140 Kansas City KS-MO	200	100.00	96.25	95.50	87.50	9.50	3.00	11.98	14.86
State of Missouri:									
Full Scope: #44180 Springfield MA	970	25.05	97.45	98.14	87.01	10.21	2.78	42.93	46.31
Limited Scope: #41140 St. Joseph MA	128	3.30	97.61	87.50	75.78	21.88	2.34	15.84	16.49
#17860 Columbia MA	75	1.94	96.83	76.00	82.67	9.33	8.00	9.70	9.90
#27900 Joplin MA	49	1.26	98.58	85.71	73.47	14.29	12.24	6.64	5.88
#27620 California Tipton MA	373	9.63	99.40	78.28	87.94	10.99	1.07	39.68	31.58
NonMA MO Combined (8 MA)	2,278	58.82	98.78	92.54	85.56	11.59	2.85	38.38	40.69
State of Kansas:									
Full Scope: #48620 Wichita MA	191	11.60	96.77	94.76	81.15	13.09	5.76	0.30	0.00
Limited Scope: #22940 Lawrence MA	10	0.61	99.31	100.00	90.00	10.00	0.00	2.78	3.23
NonMA KS combined (5 MA)	1,445	87.79	96.84	90.52	75.02	18.20	6.78	16.95	19.97

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2008).

**** 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 5.22% of small loans to farms originated and purchased by the bank.

Table12. Borrower Distribution of Small Loans to Farms (continued)

Borrower Distribution: SMALL LOANS TO FARMS 2008			Geography: COMMERCE BANK, N.A.		Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31,				
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
State of Illinois									
Full Scope: #37900 Peoria MA	276	36.85	97.95	94.93	73.19	21.01	5.80	12.10	12.43
Limited Scope: #14060 Bloomington M	467	62.35	98.15	93.58	64.88	27.84	7.28	22.11	22.91
#16580 Champaign MA	6	0.80	98.09	66.67	50.00	33.33	16.67	0.95	0.62
State of Oklahoma:									
Full Scope: #46140 Tulsa MA	3	100.00	94.74	66.67	100.00	0.00	0.00	2.30	1.43
State of Colorado:									
Full Scope: #19740 Denver- Aurora MA	1	100.00	94.14	100.00	100.00	0.00	0.00	0.00	0.00

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2008).

**** 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 5.22% of small loans to farms originated and purchased by the bank.

Institution ID: COMMERCE BANK, N.A.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: COMMERCE BANK, N.A.				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2008			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Multistate MA:									
Full Scope: #41180 St Louis MO-IL	4	2,255	1,114	45,003	1,118	47,258	100.00	0	0
Full Scope: #28140 Kansas City KS-MO	1	2,058	721	57,613	722	59,671	100.00	0	0
State of Missouri:									
Full Scope: #44180 Springfield MA	0	0	45	5,444	45	5,444	18.39	0	0
Limited Scope #41140 St Joseph MA	1	20	61	589	62	609	2.06	0	0
#17860 Columbia MA	0	0	20	5,371	20	5,371	18.15	0	0
#27900 Joplin MA	4	1,489	18	81	22	1,570	5.30	0	0
#27620 California Tipton MA	0	0	34	10	34	10	0.03	0	0
NonMA MO Combined (8 AAs)	0	0	419	4,820	419	4,820	16.29	0	0
Statewide with Potential Benefit to	6	3,269	5	8,504	11	11,773	39.78	0	0
State of Kansas:									
Full Scope: #48620 Wichita MA	2	408	307	6,347	309	6,755	50.28	0	0
Limited Scope: #22940 Lawrence MA	0	0	66	673	66	673	5.01	0	0
NonMA KS combined (5 AAs)	0	0	347	3,094	347	3,094	23.03	0	0
Statewide with Potential Benefit to	3	2,164	3	1,750	6	2,914	21.68	0	0

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

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 14. Qualified Investments (continued)

QUALIFIED INVESTMENTS 2008		geography: COMMERCE BANK, N.A.				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31,			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
State of Illinois:									
Full Scope: #37900 Peoria MA	0	0	175	3,412	175	3,412	88.17	0	0
Limited Scope: #14060 Bloomington MA	0	0	141	198	141	198	5.12	0	0
#16580 Champaign MA	0	0	13	10	13	10	0.26	0	0
Statewide with Potential Benefit to	1	250	0	0	1	250	6.45	0	0
State of Oklahoma:									
Full Scope: #46140 Tulsa MA	0	0	18	3,772	18	3,772	88.30	0	0
Statewide with Potential Benefit to	0	0	1	500	1	500	11.70	0	0
State of Colorado:									
Full Scope: #19740 Denver-Aurora MA	0	0	1	40	1	40	2.29	0	0
Statewide with Potential Benefit to	0	0	1	1,705	1	1,705	97.71	0	0

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

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: COMMERCE BANK, N.A.		Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2008	
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			
Multistate MA:																				
Full Scope: #41180 St Louis MO-IL	100.00	*55	100.00	0.00	14.55	32.73	52.72	8	5	0	0	-4	4	6.19	20.34	45.85	27.61			
Full Scope: #28140 Kansas City KS-MO	100.00	50	100.00	4.00	18.00	44.00	34.00	7	0	0	0	2	5	5.22	19.59	45.36	29.81			
State of Missouri:																				

Full Scope: #44180 Springfield MA	35.00	13	24.07	7.69	15.3 8	53.85	23.08	0	0	0	0	0	0	1.79	21.36	51.43	25.42
Limited Scope #41140 St Joseph MA	13.00	3	5.56	0.00	33.3 3	0	66.67	0	0	0	0	0	0	0.00	12.94	54.09	32.97
#17860 Columbia MA	11.00	10	18.52	30.0 0	20.0 0	20.00	30.00	2	0	0	0	1	1	7.49	17.95	50.57	23.99
#27900 Joplin MA	7.00	4	7.41	0.00	50.0 0	50.00	0.00	0	0	0	0	0	0	0.00	11.30	81.76	6.94
#27620 California Tipton	3.00	2	3.70	0.00	0.00	100.0 0	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
NonMA MO Combined (8	31.00	22	40.74	0.00	13.6 4	72.74	13.64	1	0	0	0	1	0	0.00	5.63	74.73	19.63
State of Kansas:																	
Full Scope: #48620 Wichita MA	44.52	14	37.83	7.14	42.8 6	14.29	35.71	1	1	0	-1	0	1	2.34	26.23	44.99	26.44
Limited Scope: #22940 Lawrence MA	9.14	6	16.22	16.6 7	16.6 7	16.67	49.99	0	0	0	0	0	0	5.95	25.54	46.20	22.31
NonMA KS combined (5 A	46.34	17	45.95	0.00	29.4 1	47.06	23.53	2	0	0	0	1	1	0.00	14.89	61.77	23.34

Table 15. Distribution of Branch Delivery System and Branch Openings/Closing (continued)

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		geography: COMMERCE BANK, N.A.				Evaluation Period: JANUARY 1, 2005 TO			
																		DECEMBER 31, 2008							
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population											
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography											
				Low	Mod	Mid	Upp			Lo w	Mo d	Mid	Upp	Low	Mod	Mid	Upp								
State of Illinois:																									
Full Scope: #37900 Peoria MA	50.34	8	53.33	12.5 0	0.00	62.50	25.00	1	0	0	0	0	1	6.22	13.03	59.85	20.89								
Limited Scope: #14060 Bloomington M	48.00	6	40.00	0.00	16.6 7	83.33	0.00	1	0	0	0	1	0	5.16	22.68	53.48	18.67								
#16580 Champaign MA	1.66	1	6.67	0.00	0.00	0.00	100.00	1	0	0	0	0	1	6.19	28.70	44.32	20.69								
State of Oklahoma:																									
Full Scope: #46140 Tulsa MA	100.00	2	100.00	0.00	0.00	0.00	100.00	2	0	0	0	0	2	2.72	24.16	38.71	34.41								
State of Colorado:																									
Full Scope: #19740 Denver- Aurora MA	100.00	1	100.00	0.00	100. 0	0.00	0.00	0	0	0	0	0	0	7.15	36.72	40.20	15.74								