



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **PUBLIC DISCLOSURE**

May 23, 2011

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The Boone County National Bank of Columbia  
Charter Number: 1770

720 E. Broadway Street  
Columbia, MO 65201

Office of the Comptroller of the Currency

St. Louis Field Office  
2350 Market Street, Suite 100  
St. Louis, MO 63103

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

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## Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated **Satisfactory**.

The following table indicates the performance level of **The Boone County National Bank of Columbia** (BCNB) with respect to the Lending, Investment, and Service Tests:

Performance Levels	The Boone County National Bank of Columbia Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory			
Low Satisfactory	X		
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- BCNB’s lending reflects an adequate dispersion among borrowers of different income levels.
- The geographic distribution of BCNB’s lending reflects an adequate dispersion among geographies of different income levels.
- Lending levels, as shown by the volume of all loans generated, reflect excellent responsiveness to the credit needs of the assessment area (AA).
- The volume of community development lending is relatively high and is responsive to the needs and opportunities in the AA and a wider regional/statewide area.
- BCNB has made an excellent amount of qualified investments in its AA during this evaluation period. The majority of these investments address the need for affordable housing and revitalization of a low-income census tract.
- Retail delivery systems are readily accessible to all geographies and individuals of different income levels. The bank’s record of opening and closing ATMs has improved access for low- and moderate-income individuals and in low- and moderate-income geographies.
- The bank is a leader in providing community development services within its 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 MSA/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 additional data on loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

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

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MSA/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

Boone County National Bank (BCNB) is a \$1.2 billion intrastate institution headquartered in Columbia, Missouri. BCNB operates 17 full-service retail banking branches with ATMs onsite and 9 stand-alone ATMs in two Assessment Areas (AAs) in Central Missouri. One of the AAs is the Columbia Missouri MSA, and the second AA is Cooper County. For additional information on BCNB's full-scope AA, see the Market Profile – Demographic Information Table in Appendix B.

BCNB is a subsidiary of Central Bancompany, which is a 13-bank holding company, headquartered in Jefferson City, Missouri. Central Bancompany has assets totaling approximately \$10 billion and its banks are located throughout Missouri and parts of Oklahoma. Some of these banks also have branches in Kansas and Illinois. Central Bancompany also owns 4 other related companies including a mortgage company and trust company.

BCNB is a full-service commercial bank that seeks to serve the commercial and retail banking needs of its markets. The bank offers various loan and deposit products, including commercial, construction, home mortgage, consumer, and agricultural loans. BCNB also has an operating subsidiary, Dogwood Insurance Agency. This company was established in the second quarter of 2004 and conducts property and casualty insurance sales activities.

BCNB's primary focus has been in commercial real estate lending (construction and development), as evidenced by the high concentrations in that area. Another focus is on mortgage lending, including home equity loans and lines of credit. There is not much opportunity in the area for agricultural lending. As of March 31, 2011, net loans to total assets were 57%. The distribution of the bank's loan portfolio is as follows: commercial real estate (52%), residential real estate (27%), commercial and industrial (8%), consumer (10%), agricultural (2%), credit card (less than 1%) and municipal (less than 1%) loans. The bank's loan-to-deposit ratio is 69% and Tier 1 capital is \$94 million.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. BCNB's CRA performance was rated Satisfactory in the last public evaluation dated November 14, 2006.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This Performance Evaluation assesses the bank's performance under the Lending, Investment, and Service Tests. In evaluating the bank's lending performance, we reviewed the residential mortgage loans subject to filing under the HMDA, small loans to businesses, and small loans to farms.

With the exception of community development (CD) loans, the evaluation period for the Lending Test is January 1, 2006 through December 31, 2010. For CD loans, Qualified

Investments, and the Service Test, the evaluation period is November 14, 2006 through May 23, 2011.

### **Data Integrity**

This evaluation is based on accurate data for the bank's HMDA and CRA loan data. As part of this evaluation, we sampled HMDA and CRA loan data originated during the evaluation period and found the data to be accurate. CD loans, investments and services were also verified to ensure they met the regulatory definition for community development.

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

BCNB has two AAs. The largest AA includes the entire Columbia, Missouri MSA. The bank obtains 97% of its deposits from this AA. The AA does not reflect any illegal discrimination and does not arbitrarily exclude low- or moderate-income geographies. The Columbia MSA AA received a full-scope review, and BCNB's CRA ratings are based on results of this analysis.

A limited-scope review was performed on the Cooper County AA. Refer to Appendix A for more information regarding the AAs receiving full-scope and limited-scope reviews.

### **Ratings**

The overall rating is based primarily on the bank's performance in the full-scope AA (Columbia MSA). Performance under the Lending Test receives greater weight than performance under the Investment Test or Service Test when assigning an overall CRA rating. Under the Lending Test, HMDA loan originations received more weight than small business loan originations since they accounted for a significantly higher volume by both number and dollar. Small farm, home improvement and multifamily loans were not analyzed based on the small volume of originations. None of these loan types was an identified primary credit need within the AA.

### **Other**

We performed two community contacts with representatives of local community organizations during this examination. Both contacts felt the banks in the AA were meeting the area's primary credit needs.

### **Fair Lending or Other Illegal Credit Practices Review**

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

## Conclusions with Respect to Performance Tests

### LENDING TEST

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

The bank's performance under the lending test is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Columbia MSA is adequate. Since small farm, multifamily, and home improvement lending are not significant products of BCNB, they are not included in this analysis.

#### Lending Activity

Lending levels reflect excellent responsiveness to the credit needs of the AA. BCNB is the dominant deposit-taking institution in the market and is the top lender of home mortgage loans. BCNB is the second largest lender by number and largest lender by dollars of small business loans. Refer to Table 1, Lending Volume, in Appendix C for the facts and data used to evaluate the bank's lending activity.

During the evaluation period of January 1, 2006 to December 31, 2010, BCNB made 7,774 Home Mortgage, Small Business, and Small Farm loans in the Columbia MSA, totaling \$1,044,557,000. Approximately 64% of loans originated or purchased in this AA are Home Mortgage loans, 32% are Small Business loans, and 4% are Small Farm loans. Of the total Home Mortgage loans, 53% are Home Refinance loans, 40% are Home Purchase loans, and 7% are Home Improvement loans.

BCNB is ranked the largest deposit-taking institution out of 33 institutions in the AA. Information on deposit market share, compiled by the FDIC as of June 30, 2010, shows BCNB has \$965 million in deposits inside the AA, for a market share of 33.4%. The next closest competitor has a market share of 16.96%.

BCNB ranks 1st out of 236 lenders in the AA for total home mortgage loans originated or purchased, based on 2009 peer mortgage data. BCNB originated or purchased \$226 million in home mortgage loans, accounting for 16% of the market share. The next closest competitor holds 8% of the market share. BCNB ranks 1st out of 196 lenders in the AA for home refinance lending, with a 16.61% market share. BCNB ranks 1st out of 140 lenders in the AA for home purchase lending, with a 12.33% market share.

For small business lending, BCNB ranks 2nd out of 43 lenders in the AA, with a 11.44% market share for number of loans made (428 loans) and a 36.47% market share for dollar amount of loans made (\$53 million). GE Money Bank ranks first for number of loans (1,554) made in this AA; however, the total dollar amount of these loans was only \$13 million. Although there is limited activity in small farm lending in this AA, BCNB also ranks 1st out of 21 lenders for small farm lending, with a 32.39% market share for number of loans made (46) and a 31.23% market share for dollar amount of loans made (\$3 million).

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

BCNB's lending reflects an adequate dispersion among geographies of different income levels.

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

The overall geographic distribution of home mortgage loans in the AA is adequate. Performance in home refinance and home purchase lending is adequate. Of the five low-income census tracts, two tracts have experienced a reduction in owner-occupied housing due to a local college purchasing many of the properties for expansion. Of the seven moderate-income tracts, three have seen a significant change from owner-occupied housing to rental units over the past several years. Two additional moderate-income tracts have also experienced a reduction in owner-occupied units due to either being replaced by commercial properties and apartment buildings or being purchased by the university for expansion. However, these changes occurred after the last census and are not reflected in the census data used for this evaluation. Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Home refinance loan geographic distribution is adequate. The percentage of home refinance loans made in the low-income geographies (0.91%) is below the percentage of owner-occupied housing units (1.68%) in those geographies. The bank's market share for home refinance loans made in the low-income geographies (4.76%) is well below the bank's overall market share for home refinance loans (16.61%). The percentage of home refinance loans made in the moderate-income geographies (7.26%) was well below the percentage of owner-occupied housing units in those geographies (12.53%). The bank's market share for home refinance loans made in the moderate-income geographies (12.77%) is below the bank's overall market share for home refinance loans (16.61%).

Home purchase loan geographic distribution is adequate. The percentage of home purchase loans made in the low-income geographies (1.87%) slightly exceeds the percentage of owner-occupied housing units (1.68%) in those geographies. However, the bank's market share for home purchase loans made in the low-income geographies (8.62%) is below the bank's overall market share for home purchase loans (12.33%). The percentage of home purchase loans made in the moderate-income geographies (9.61%) was below the percentage of owner-occupied housing units in those geographies (12.53%). The bank's market share for loans made in the moderate-income geographies (8.94%) is below the bank's overall market share for home purchase loans (12.33%).

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

The bank's geographic distribution of small loans to businesses in the full-scope AA is good. Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

BCNB's performance in low- and moderate-income geographies is good. During the 2006-2010 evaluation period, 20.81% of small business loans were made in low-income geographies, which exceeds the 16.57% of businesses located in low-income geographies.

The bank's market share for small loans to businesses in low-income geographies (12.58%) exceeds the overall market share for small business loans (11.44%). The percentage of small business loans made in moderate-income geographies (10.90%) is below the percentage of businesses located in moderate-income CTs (16.94%). The bank's market share for small loans to businesses in moderate-income geographies (10.46%) is below the overall market share for small business loans (11.44%)

***Lending Gap Analysis***

Maps and reports detailing BCNB's lending activity over the evaluation period for home mortgage and small business loans were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified.

***Inside/Outside Ratio***

A significant majority of loans originated or purchased by BCNB over the evaluation period are within its AAs. Approximately 93% of the bank's home mortgage and 91% of small business loans are within its AAs. Of the 133 business purpose loans secured by real estate (optional loans), 92% were made within the bank's AAs. This performance was factored into the overall analysis of the geographic distribution of lending by income level of geographies.

This analysis was performed at the bank level, as opposed to the AA level. The information includes bank originations and purchases only.

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

BCNB's lending reflects an adequate dispersion among borrowers of different income levels.

***Home Mortgage Loans***

The borrower distribution of home mortgage loans is adequate. The distribution in relation to moderate-income borrowers is good, while the distribution to low-income borrowers is well below the demographic data. In evaluating the borrower distribution of home mortgage loans, we considered the large number of households that live below the poverty level (15%) and the barriers that this may have on home ownership. Additionally, approximately 20% of the AA population consists of college students, many of them seasonal residents who do not typically pursue home ownership. Refer to Tables 8, 9, and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home refinance loans is adequate. The percentage of home refinance loans made to low-income borrowers (8.02%) is well below the percentage of low-income families (19.80%) in the AA. However, the bank's market share for loans made to low-income borrowers (17.22%) is close to the bank's overall market share for home refinance loans (18.72%). The percentage of home refinance loans made to moderate-income borrowers (15.92%) is below the percentage of moderate-income families (18.22%) in the AA. The bank's market share for loans made to moderate-income borrowers (14.09%) is below the bank's overall market share for home refinance loans (18.72%).

The borrower distribution of home purchase loans is adequate. The percentage of home purchase loans made to low-income borrowers (12.27%) is well below the percentage of low-income families (19.80%) in the AA. The bank's market share for loans made to low-income borrowers (11.11%) is below the bank's overall market share for home purchase loans (13.01%). The distribution of home purchase loans to moderate-income borrowers reflects better performance. The percentage of home purchase loans made to moderate-income borrowers (22.50%) significantly exceeds the percentage of moderate-income families (18.22%) in the AA. The bank's market share for loans made to moderate-income borrowers (10.53%) is below the bank's overall market share for home purchase loans (13.01%).

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

The borrower distribution of small loans to businesses reflects adequate penetration among businesses of different sizes. Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

In the full-scope AA, 2,513 small loans to businesses were originated during the evaluation period. The percentage of small loans made to businesses with revenue less than \$1 million (56.35%) is below the percentage of businesses in the AA with revenues of less than \$1 million (75.96%). BCNB's market share of small loans made to businesses with revenue less than \$1 million is 26.04% which significantly exceeds its overall 11.44% market share for small loans to businesses.

### **Community Development Lending**

Community development (CD) lending has a positive effect on the Lending Test conclusions. The volume of CD lending is relatively high and is responsive to the need for affordable housing and other CD opportunities in the AA. BCNB actively supports economic development in its AA by funding loans associated with the Small Business Administration's (SBA's) CDC/504 loan program. BCNB also provides funding to organizations that develop affordable housing throughout the State of Missouri.

Refer to Table 1, Lending Volume, in Appendix C 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 multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

During the evaluation period, BCNB extended 14 CD loans totaling approximately \$30 million. Eleven of these loans (over \$24 million) were made within the AA, with the remainder funding loans within the State of Missouri. The three regional/statewide loans provided funds for low- and moderate-income housing developments. While the housing developments were not all located in the bank's AA, the Columbia MSA AA is included in the region where these loans can be made.

Five loans totaling approximately \$8 million were made through the SBA 504 loan program. These various loans were primarily for the expansion or renovation of existing businesses and projected the creation of 71 new jobs. Currently, these businesses report having created 50 new jobs since receiving the funding under this program.

The bank originated 7 CD loans totaling \$19 million to a local developer headquartered in Columbia, Missouri. This funding was used by the developer to support the development of affordable housing projects both within the Columbia MSA and throughout the State of Missouri, which has the potential to benefit BCNB's AA. These projects receive state and federal low-income housing tax credits. Four of these 7 loans amounting to \$13 million were within the AA.

### **Product Innovation and Flexibility**

Product flexibility has a positive effect on the Lending Test conclusions. BCNB offers several flexible lending products, which include national products provided by Fannie Mae (My Community Mortgage Loans), Freddie Mac (Home Possible Loans), and the USDA (USDA Rural Development Home Loans). The bank also provides flexibility through a Missouri Housing Development Commission (MHDC) program, in conjunction with the USDA, and a City of Columbia program (Home Ownership Assistance). The Fannie Mae and Freddie Mac products are popular with the low- and moderate-income borrowers given the low down payment requirements and flexibility of credit scores and income levels. The USDA Rural Development Home Loans provide a 90% guaranty and a no down payment option for eligible borrowers (low- and moderate-income borrowers in rural areas). The remaining programs provide down payment and closing cost assistance for first-time home buyers. The bank has originated over 300 loans under these various programs. One hundred twenty-four loans for \$11,908,858 were extended under the USDA program, 12 loans for \$1,431,615 were made under the Fannie Mae program, 11 loans for \$922,250 were made under the Freddie Mac program, and 56 loans for \$5,572,707 were extended under the MHDC program. The bank also made 135 FHA and VA loans for \$18,347,143. Data on the number and dollar amount of loans extended under the Home Ownership Assistance program were not provided. The data for the Fannie Mae and Freddie Mac programs was only available for 2006.

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

Based on a limited-scope review, the bank's performance under the lending test in the Cooper County AA is not inconsistent with the bank's overall Low Satisfactory performance under the lending test. Refer to Tables 1 through 13 in Appendix C for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test is rated Outstanding. Based on a full-scope review, the bank's performance in the Columbia Missouri MSA is excellent. Refer to Table 14 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

### **Current Period Investments**

BCNB made approximately \$8 million in current period qualified investments to various organizations that provide housing and social services primarily for low- and moderate-income individuals. Other investments assist with revitalization of a low-income CT and community services for low- and moderate-income individuals. The more prominent investments and contributions made by BCNB are described below.

BCNB purchased Low-Income Housing Tax Credits in conjunction with several projects to provide affordable housing in the Columbia Missouri MSA and throughout Central Missouri. The projects are constructed by a developer located in Columbia, Missouri, who provides affordable housing for low- and moderate-income individuals. The funds in this program are used to construct or rehab low- and moderate-income housing projects and assist in funding low-income housing needs for rental and home ownership. A total of \$5 million was invested in tax credits within the AA. An additional \$2 million was invested in tax credits throughout the State of Missouri; see Regional/Statewide Investments below.

BCNB donated two pieces of real estate to the local Habitat for Humanity organization. These properties had a combined value of \$362,000.

BCNB also made several donations to local community organizations that have a community development purpose. The bank made sixty-four separate donations for \$144,889 to fifteen organizations that provided affordable housing and community services such as daycare, job training, and medical care for low- or moderate-income individuals.

### **Regional/Statewide Investments**

BCNB purchased approximately \$2 million in Low-Income Housing Tax Credits related to the local developer described above. The project provides affordable housing for low- and moderate-income individuals.

BCNB purchased \$180,695 in Historical Tax Credits. The projects within this program help to revitalize or renovate commercial buildings in low- or moderate-income areas. The proceeds of these tax credits were used to rehab a commercial building in a designated Enterprise Zone in Springfield, Missouri. The business which occupies the building qualifies for job credits since it employs low- and moderate-income individuals from a local sheltered workshop.

## **Prior Period Investments - Regional/Statewide Investments**

During a prior evaluation period, BCNB also purchased Low-Income Housing Tax Credits in conjunction with several projects to provide affordable housing throughout Central Missouri. The projects, as noted above, are constructed by a developer located in Columbia, Missouri, and provide affordable housing for low- and moderate-income individuals. The funds in this program are used to construct or rehab low- and moderate-income housing projects. The current balance of this investment is \$104,360.

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

Based on a limited-scope review, the bank's performance under the investment test in the Cooper County AA is not inconsistent with the bank's overall Outstanding performance under the investment test. Refer to Table 14 in Appendix C 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 is rated Outstanding. Based on a full-scope review, the bank's performance in the Columbia MSA is excellent.

### **Retail Banking Services**

BCNBs distribution of branches in the AA is excellent. The percentage of branches in low- and moderate-income geographies exceeds the percentage of the population that lives in these geographies. Additionally, the distribution of ATMs within the low- and moderate-income geographies in the AA exceeds the percentage of the population that lives in these geographies. Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are readily accessible to geographies and individuals of different income levels. The percentage of bank offices in low- and moderate-income geographies exceeds the percentage of the population in low- and moderate-income geographies. The bank has 13% of its branches located in low-income geographies, while 6.96% of the population lives in low-income geographies. Another 20% of the bank's branches are located in moderate-income geographies, with 18.82% of the population living in moderate-income geographies. The excellent branch distribution among low- and moderate-income geographies was particularly noteworthy and had a significant impact on the bank's performance under the Service Test.

BCNB also has 28 ATMS located in the Columbia MSA. Fifteen of the ATMs are located at the branch facilities, nine ATMs are located at offsite facilities spread throughout the Columbia MSA, and four non-proprietary ATMs are contracted on the University of Missouri campus.

The distribution of ATMs within the AA is good. Of the 24 proprietary ATMs, 17% are located in low-income geographies, with 6.96% of the population living in low-income geographies. Twenty-one percent of the ATMs are located in moderate-income geographies, with 18.82% of the population living in moderate-income geographies.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, BCNB opened one branch and two ATMs in this AA. The branch and one ATM are located in a middle-income CT. The other ATM is in a low-income CT; the opening of this ATM has had a positive impact on the accessibility of delivery systems. BCNB also closed two ATMs; both were located near full-service branches.

The bank offers a wide range of banking products and services throughout its full-scope AA. The products, services, and business hours are reasonable and do not vary significantly from one location to another.

The bank's alternative delivery systems are adequate. In addition to the extensive ATM network, the bank offers on-line banking and 24-hour telebanking to increase the user access of its customers. BCNB could not demonstrate the impact of these systems in low- and moderate-income geographies or the use of these systems by low- and moderate-income individuals. Therefore, we did not place significant weight on these alternative systems when drawing our CRA performance conclusions.

## **Community Development Services**

BCNB is a leader in providing Community Development (CD) Services in the Columbia Missouri AA. Management is involved in numerous CD programs targeted to low- and moderate-income individuals, positively impacting the Service Test rating. Employees and directors serve on committees and/or boards of different organizations that serve low- and moderate-income individuals. They volunteer to provide services including credit counseling and first-time homebuyer seminars, financial planning, technical expertise to non-profit or local governmental organizations, and financial education and management skills. The following paragraphs highlight the major CD services BCNB provided during this evaluation period.

Money Smart classes are taught through the Columbia Housing Authority Low-Income Services (CHALIS). A BCNB employee taught a session titled "Your Own Home." The presentation described the mortgage lending process from start to finish. Several lending programs were reviewed including Missouri Housing Development Corporation (MHDC) loans, USDA lending, and My Community Mortgages. Several other BCNB employees have covered first-time homebuyer education in classes sponsored by the Columbia Housing Authority. Classes are free for low- and moderate-income Boone County residents. The Money Smart program has been helping future homeowners since 2004. Graduates of the class can also apply for the City of Columbia's Down Payment Assistance program (see earlier comments under Product Innovation and Flexibility for additional details).

The Central Missouri Food Bank (CMFB) is a regional disaster and hunger relief network that acquires and distributes millions of pounds of donated food annually. CMFB distributes food to people in need through a network of 142 agencies in 33 Missouri counties. CMFB provides free food to soup kitchens, emergency food pantries, shelters for the abused and homeless, programs for low-income children and senior citizens, and rehabilitation centers. A BCNB employee serves as a Board member of the CMFB. He uses his financial and technical expertise to help with reviews of financial reports, fundraising, and human resource issues. Several bank employees also volunteer at the food bank on a regular basis.

The Columbia Community Development Corp (CDC) works with the City of Columbia to revitalize low- and moderate-income CTs in Columbia. The program's goal is to improve the general condition of housing in targeted neighborhoods and increase home ownership opportunities for low- and moderate-income families. The group tears down (if necessary) and builds new homes for individuals. The group utilizes local schools for construction labor, while providing technical training to those students. A bank employee serves on the Board of Directors and provides fiscal and technical advice and assistance, which includes budgeting and grant allocation.

The City of Columbia Loan and Grant Committee provides funds to low-income homeowners in Columbia for the rehabilitation of their homes. A BCNB employee served as the committee chair for two years and as a committee member the other two years of this evaluation period. He provides fiscal and technical advice and assistance and plays a role in the review and approval of loans and grants in the program. He also helps in the selection of individuals qualified for the program.

The City of Columbia's Affordable Housing Committee is made up of local citizens (realtors, builders, bankers, and community members) who are responsible for determining the needs of the community in regards to owner-occupied households below the median income level and making recommendations to the City Council. A BCNB employee provides financial expertise to this group as a member of the Financing/Grants/Financial Incentives subcommittee.

Job Point is an organization that provides career planning and job placement assistance to unemployed and low- and moderate-income individuals. The organization specializes in preparing individuals to enter the workforce. The organization also provides career counseling, skills training, and job interview training. Two BCNB employees serve on the Board for this organization and provide financial and technical assistance through budgeting and oversight of the business operations.

Enterprise Development Corporation (EDC) is the group that administers the SBA 504 loan program in Central Missouri. The program provides loans to small businesses in order to increase the level of economic development and provide job creation and retention. The corporation also administers the City of Columbia's home ownership program by qualifying buyers and processing the down payment/closing costs assistance application. The EDC also administers the City's Affordable Housing Program, which builds new homes in the older neighborhoods of central Columbia for low- and moderate-income families. A BCNB employee served two years on the Board of Directors' Loan Committee and provided financial and technical expertise by reviewing loan requests and voting on approval or denial of applications. Two other employees taught lending courses to individuals applying for credit from this organization.

The Voluntary Action Center (VAC) provides emergency financial assistance to low-income persons when no other program is available to meet a need. The organization identifies and fills gaps in community services, food, shelter, clothing, utilities, and transportation. It also offers information and referral resources to individuals. Three BCNB employees serve on the Board of Directors and participate in the finance and budgeting activities.

Heart of Missouri CASA is an organization that recruits, trains, and disperses volunteers to assist the courts in child abuse and neglect family court cases. The majority of the court cases involve children from low- and moderate-income families. The program volunteers are there to represent the best interests of the children. A BCNB employee was the organization's Treasurer for two years. She provided financial and technical expertise by participating in budgeting, paying bills, reconciliation, fund raising, approving expenses and reimbursements, payroll, and strategic planning.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Cooper County AA is not inconsistent with the bank's overall Outstanding performance under the Service Test. Refer to Table 15 in Appendix C for the facts and data that support these conclusions.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): (01/01/06 to 12/31/10) Investment and Service Tests and CD Loans: (11/14/06 to 05/23/11)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
The Boone County National Bank of Columbia (BCNB), Columbia, Missouri	Home purchase, home refinance, and small business	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not Applicable		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Columbia MO MSA #17860 Cooper County MO	Full-Scope Limited-Scope	

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

### Columbia Missouri MSA

Demographic Information for Full-Scope Area: Columbia Missouri MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	32	15.63	21.88	46.88	15.63	0.00
Population by Geography	145,666	6.96	18.82	51.91	22.31	0.00
Owner-Occupied Housing by Geography	33,413	1.68	12.53	59.86	25.94	0.00
Businesses by Geography	10,428	16.57	16.94	45.86	20.64	0.00
Farms by Geography	682	1.91	16.86	73.02	8.21	0.00
Family Distribution by Income Level	34,322	19.80	18.22	23.18	38.80	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	13,049	8.22	20.23	57.85	13.70	0.00
Median Family Income		\$50,099				
HUD Adjusted Median Family Income for 2010		\$63,700				
Households Below the Poverty Level		15%				
				Median Housing Value		\$98,396
				Unemployment Rate		3.02%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 2000 U.S. Census, and 2010 HUD updated MFI.

BCNB designates the Columbia, Missouri MSA, as its main AA. The AA includes 97% of its deposits, 93% of its loans originated during the evaluation period, and 88% of its branch offices. The bank has 15 branches and 28 (4 are contracted) ATMs in this AA. During the evaluation period, BCNB opened one branch and two ATMs in this AA.

Columbia is a steadily growing community, located in the central part of Missouri. The community is heavily influenced by three colleges/universities located in Boone County, including the main campus of the University of Missouri. The University of Missouri at Columbia is the state's largest university and the AA's largest employer with over 7,500 employees.

BCNB has the largest deposit market share of its over 30 competitors as of June 30, 2010. Banking competition is fierce within the AA and includes two larger regional banks and two large multinational banks with branches in the AA. There are also numerous smaller banks, savings and loans, and credit unions competing in the AA.

Based on two recent community contacts conducted in the AA, we did not identify any unmet community credit needs in the AA.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

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

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. 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 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: BOONE COUNTY NATIONAL BANK

**Table 1. Lending Volume**

LENDING VOLUME		Geography: MISSOURI				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2010						
Assessment Area :	% of Rated Area Loans (#), in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Columbia MO MSA	93.26	4,981	713,401	2,513	313,513	280	17,643	0	24,169	7,77485	1,044,5572 6	97.20
<b>Limited Review:</b>												
Cooper County MO	6.74	391	42,234	111	9,824	60	4,531	0	0	5622	56,589	2.80
<b>Regional/Statewide:</b>												
State of Missouri	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3	6,243	3	6,243	2.80

\* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from November 14, 2006 to May 23, 2011.

\*\*\* Deposit Data as of June 30, 2010. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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**Table 1. Other Products**

LENDING VOLUME		Geography: MISSOURI				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2010								
Assessment Area :	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Columbia MO MSA	94.26	115	15,436	115	15,436	0	0	0	0	0	0	0	0	97.20
<b>Limited Review:</b>														
Cooper County MO	5.74	7	420	7	420	0	0	0	0	0	0	0	0	2.80

\* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2006 to December 31, 2010.

\*\*\* Deposit Data as of June 30, 2010. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: MISSOURI				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2010					Market Share (%) by Geography				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ*** Units	% BANK**** Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Columbia MO MSA	1,977	94.10	1.68	1.87	12.53	9.61	59.86	60.29	25.93	28.23	12.33	8.62	8.94	11.95	15.87	
<b>Limited Review:</b>																
Cooper County MO	124	5.90	0.00	0.00	0.00	0.00	64.40	58.87	35.60	41.13	12.50	0.00	0.00	11.38	14.29	

\* Based on 2009 Peer Mortgage Data (USPR)

\*\* 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)

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

Geographic Distribution: HOME IMPROVEMENT		Geography: MISSOURI				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2010					Market Share (%) by Geography				
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****	% Owner Occ Units***	% BANK****	% Owner Occ Units***	% BANK****	% Owner Occ Units***	% BANK****					
<b>Full Review:</b>															
Columbia MO MSA	351	92.86	1.68	0.85	12.53	7.98	59.86	63.82	25.94	27.35	36.63	0.00	29.63	33.14	48.61
<b>Limited Review:</b>															
Cooper County MO	27	7.14	0.00	0.00	0.00	0.00	64.40	81.48	35.60	18.52	36.67	0.00	0.00	40.00	30.00

\* Based on 2009 Peer Mortgage Data (USPR)

\*\* 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)

Institution ID: BOONE COUNTY NATIONAL BANK

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MISSOURI				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2010					Market Share (%) by Geography <sup>*</sup>				
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 <sup>**</sup>	% Owner Occ <sup>***</sup> Units	% BANK <sup>****</sup> Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans						
<b>Full Review:</b>																
Columbia MO MSA	2,631	91.67	1.68	0.91	12.53	7.26	59.86	60.66	25.94	31.17	16.61	4.76	12.77	16.43	18.33	
<b>Limited Review:</b>																
Cooper County MO	239	8.33	0.00	0.00	0.00	0.00	64.40	58.58	35.60	41.42	19.50	0.00	0.00	20.33	18.18	

<sup>\*</sup> Based on 2009 Peer Mortgage Data (USPR)

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> 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.

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

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

Geographic Distribution: MULTIFAMILY		Geography: MISSOURI						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2010							
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
<b>Full Review:</b>															
Columbia MO MSA	22	95.65	26.53	18.18	30.29	9.09	16.53	50.00	26.64	22.73	33.33	0.00	0.00	45.45	50.00
<b>Limited Review:</b>															
Cooper County MO	1	4.35	0.00	0.00	0.00	0.00	56.93	0.00	43.07	100.00	100.00	0.00	0.00	0.00	100.00

\* Based on 2009 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of multifamily units is the number of multifamily 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.

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: MISSOURI				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2010					Market Share (%) by Geography				
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 Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans						
<b>Full Review:</b>																
Columbia MO MSA	2,513	95.77	16.57	20.81	16.94	10.90	45.86	47.79	20.64	20.49	11.44	12.58	10.46	12.57	9.37	
<b>Limited Review:</b>																
Cooper County MO	111	4.23	0.00	0.00	0.00	0.00	70.21	63.06	29.79	36.94	4.59	0.00	0.00	4.29	5.17	

\* Based on 2009 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 (2010).

Institution ID: BOONE COUNTY NATIONAL BANK

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

Geographic Distribution: SMALL LOANS TO FARMS		Geography: MISSOURI					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2010					Market Share (%) by Geography				
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						
<b>Full Review:</b>																
Columbia MO MSA	280	82.35	1.91	1.43	16.86	1.79	73.02	91.07	8.21	5.71	32.39	25.00	8.00	38.89	20.00	
<b>Limited Review:</b>																
Cooper County MO	60	17.65	0.00	0.00	0.00	0.00	61.14	51.67	38.86	48.33	6.00	0.00	0.00	3.53	9.23	

\* Based on 2009 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 (2010).

Institution ID: BOONE COUNTY NATIONAL BANK

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

Borrower Distribution: HOME PURCHASE		Geography: MISSOURI					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2010					Market Share				
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****	% Families <sub>1</sub>	% BANK Loans	% Families***	% BANK Loans	% Families***	% BANK Loans						
<b>Full Review:</b>																
Columbia MO MSA	1,977	94.10	19.80	12.27	18.22	22.50	23.18	22.34	38.80	42.90	13.01	11.11	10.53	11.80	17.28	
<b>Limited Review:</b>																
Cooper County MO	124	5.90	12.69	2.56	15.22	23.08	25.89	30.77	46.20	43.59	15.53	6.67	17.02	20.51	13.33	

\* Based on 2009 Peer Mortgage Data (USPR)

\*\* 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 Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 5.6% of loans originated and purchased by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT			Geography: MISSOURI				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2010					Market Share				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>2</sup>	% BANK Loans	% Families***	% BANK Loans	% Families***	% BANK Loans						
<b>Full Review:</b>																
Columbia MO MSA	351	92.86	19.80	14.45	18.22	16.52	23.18	18.58	38.80	50.44	37.02	43.33	24.56	26.98	47.32	
<b>Limited Review:</b>																
Cooper County MO	27	7.14	12.69	11.11	15.22	18.52	25.89	7.41	46.20	62.96	36.67	0.00	66.67	20.00	42.11	

\* Based on 2009 Peer Mortgage Data (USPR)

\*\* 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 Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.2% of loans originated and purchased by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MISSOURI				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2010					Market Share				
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****	% Families <sup>3</sup>	% BANK	% Families***	% BANK	% Families***	% BANK						
<b>Full Review:</b>																
Columbia MO MSA	2,631	91.67	19.80	8.02	18.22	15.92	23.18	22.30	38.80	53.76	18.72	17.22	14.09	17.10	21.35	
<b>Limited Review:</b>																
Cooper County MO	239	8.33	12.69	2.13	15.22	5.53	25.89	23.40	46.20	68.94	24.37	11.76	5.56	28.36	27.55	

\* Based on 2009 Peer Mortgage Data (USPR)

\*\* 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 Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.8% of loans originated and purchased by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MISSOURI			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2010				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Columbia MO MSA	2,513	95.77	75.96	56.35	71.91	13.93	14.17	11.44	26.04
<b>Limited Review:</b>									
Cooper County MO	111	4.23	79.79	72.07	72.07	22.52	5.41	4.59	13.51

\* Based on 2009 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 - 2010).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 16.12% of small loans to businesses originated and purchased by the bank.

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**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MISSOURI			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2010				
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 \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Columbia MO MSA	280	82.35	98.53	58.93	82.86	12.86	4.29	32.39	23.08
<b>Limited Review:</b>									
Cooper County MO	60	17.65	99.53	63.33	76.67	20.00	3.33	6.00	4.48

\* Based on 2009 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 - 2010).

\*\*\*\* 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 37.35% of small loans to farms originated and purchased by the bank.

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**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: MISSOURI			Evaluation Period: NOVEMBER 14, 2006 TO MAY 23, 2011				
Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Columbia MO MSA	0	0	70	5,741	70	5,741	0.00	0	0
<b>Limited Review:</b>									
Cooper County MO	0	0	0	0	0	0	0.00	0	0
<b>Regional/Statewide:</b>									
State of Missouri	1	104	3	2,169	4	2,273	0.0036	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.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: MISSOURI																	
Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2010																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Columbia MO MSA	97.20	15	88.24	13.33	20.00	46.67	20.00	0	0	0	0	+1	0	6.96	18.82	51.91	22.31
<b>Limited Review:</b>																	
Cooper County MO	2.80	2	11.76	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	70.31	29.69

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**Distribution of Branch and ATM Delivery System**

Distribution of Branch and ATM Delivery System				Geography: MISSOURI				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2010									
Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Columbia MO MSA	97.20	15	88.24	13	20	47	20	24	92.31	16.67	20.83	41.67	20.83	6.96	18.82	51.91	22.31
<b>Limited Review:</b>																	
Cooper County MO	2.80	2	11.76	0	0	100	0	2	0.00	0.00	0.00	100.00	0.00	0.00	0.00	70.31	29.69