



LARGE BANK

Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

Public Disclosure

October 20, 2003

Community Reinvestment Act Performance Evaluation

**UMB Bank Colorado, National Association
Charter Number: 23905**

**1670 Broadway
Denver, CO 80202**

**Office of the Comptroller of the Currency
Midsize Banks
One Financial Place
440 South LaSalle Street, Suite 2700
Chicago, IL 60605-1073**

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.

Table of Contents

OVERALL CRA RATING	1
DEFINITIONS AND COMMON ABBREVIATIONS	2
DESCRIPTION OF INSTITUTION.....	6
SCOPE OF THE EVALUATION.....	7
FAIR LENDING REVIEW	8
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....	9
LENDING TEST	9
INVESTMENT TEST.....	11
SERVICE TEST	12
APPENDIX A: SCOPE OF EXAMINATION	A-16
APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS	B-1
APPENDIX C: TABLES OF PERFORMANCE DATA.....	C-1

Overall CRA Rating

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

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

Performance Levels	UMB Bank Colorado, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
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:

- UMB-CO’s performance under the lending test is adequate in both the Denver and Colorado Springs MAs.
- Community development lending is significant, which has a positive impact on the Lending Test.
- UMB-CO’s service delivery systems provide good access to low- and moderate-income geographies and individuals. Bank personnel provided their financial expertise through participation in community development services.
- UMB-CO provided an adequate level of qualified investments in the Denver and Colorado Springs MAs.

Definitions and Common Abbreviations

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

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

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

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

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

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

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male 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 or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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

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

Description of Institution

UMB Bank of Colorado, National Association (UMB-CO) is a \$390 million intrastate financial institution headquartered in Denver, Colorado. UMB is a wholly owned subsidiary of UMB Financial Corporation (UMBFC), a \$7 billion regional, multi-bank holding company headquartered in Kansas City, Missouri. UMBFC owns and operates four other national banks, one credit card bank, and one trust company, with 156 locations throughout Missouri, Kansas, Illinois, Oklahoma, Nebraska, and Colorado. UMBFC also owns the UMB Community Development Corporation (UMB CDC). The UMB CDC was designed to provide low-cost mortgages to developers for the rehabilitation of distressed properties, and to low- and moderate-income persons for owner-occupied home improvement purposes.

UMB-CO is a full-service banking institution, which offers a wide variety of retail and commercial banking services. In addition, UMB-CO offers other treasury management, electronic payment, trust, securities transfer, capital market, investment banking, brokerage, insurance, and mutual fund services. As of June 30, 2003, UMB-CO's loan portfolio, by dollar volume, consisted of 39 percent loans to individuals, 35 percent commercial loans, 25 percent real estate loans, and 1 percent other loans. Net loans represent 54 percent of total deposits and 46 percent of total assets. Tier 1 capital is \$28 million.

UMB-CO operates 11 branches and 26 Automated Teller Machines (ATMs) in the state of Colorado. Six branches and 16 ATMs are in the Denver MA, and five branches and 10 ATMs are in the Colorado Springs MA.

There are no legal, financial, or other factors that impede the bank's ability to help meet credit needs in its assessment areas. UMB-CO received a "Satisfactory" rating at its last CRA examination dated November 13, 2000.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the lending test, excluding community development loans, is January 1, 2000 through December 31, 2002. We evaluated consumer loans as they represent a substantial majority of the bank's business. As a percentage of total HMDA, small business, small farm, and consumer loans originated during our evaluation period, loans to individuals are 94 percent by number and 64 percent by dollar volume of loans in the Denver MA, and 76 percent by number of loans in the Colorado Springs MA. Therefore, an analysis of HMDA, small business, and small farm loan performance is not meaningful. Since the collection of consumer loan data is optional, there is no information available to compare this product with other lender's performance.

The evaluation period for the investment and service tests, and community development loans, is November 14, 2000 through October 20, 2003.

Data Integrity

We performed a data integrity examination in May 2003 to test the accuracy of consumer loan data. The examination included loans originated during our evaluation period. Errors identified from our review of the consumer loan data were not significant and did not impact the evaluation.

We evaluated information regarding community development loans, investments, and services during this examination.

Selection of Areas for Full-Scope Review

UMB-CO has two assessment areas (AAs) in the state of Colorado, which include the Denver MA and the Colorado Springs MA. We selected both MAs for full-scope reviews.

Ratings

The bank's overall rating is based on its performance in the Denver and the Colorado Springs MAs. More weight is given to performance in the Denver MA since a majority of loans are in this AA. Approximately 91 percent of the number and 89 percent of the dollar volume of consumer loans originated during our evaluation period are in the Denver MA.

Fair Lending Review

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

Conclusions with Respect to Performance Tests

LENDING TEST

We evaluated consumer loans in both the Denver and Colorado Springs MAs. As a percentage of total HMDA, small business, small farm, and consumer loan originations during our evaluation period, loans to individuals are 94 percent by number and 64 percent by dollar volume in the Denver MA. In the Colorado Springs MA, loans to individuals represent 76 percent of the number of originations. Therefore, an analysis of HMDA, small business, and small farm loan performance is not meaningful.

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Colorado is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Denver and Colorado Springs MAs is good. The significant volume of community development lending positively impacted the Lending Test.

Lending Activity

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

Lending levels reflect adequate responsiveness to AA credit needs. Market share information for consumer loan products is not available.

UMB-CO's deposit market share in the Denver MA is less than one percent. In the Colorado Springs MA, deposit market share is three percent.

Distribution of Loans by Income Level of the Geography

The distribution of consumer loans by income level of geography is adequate in both the Denver and Colorado Springs MAs. Consumer loans are the primary loan product for UMB-CO.

Consumer Loans

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

In the Denver MA, the distribution of consumer loans in low-income census tracts is adequate considering that 33 percent of households in this area are below poverty level. The distribution of loans in moderate-income census tracts is also adequate with 14 percent of households below poverty level.

In the Colorado Springs MA, the distribution of consumer loans in moderate-income census tracts is adequate considering that 17 percent of households in this area are below poverty level. UMB-CO did not originate any loans in low-income census tracts. However, only two percent of all households in the AA are in low-income census tracts.

Lending Gap Analysis

Our geographic distribution analysis included a review for any lending gaps in the Denver and Colorado Springs MAs, particularly in low- and moderate-income areas. We did not identify any unexplained conspicuous gaps in the bank's lending activity.

Inside/Outside Ratio

For the geographic distribution analysis, we performed an inside/outside ratio analysis. A majority of the bank's loans, 80 percent by number, originated to borrowers within the bank's AAs. We viewed the bank's inside/outside ratio as a positive characteristic in our assessment of lending performance.

Distribution of Loans by Income Level of the Borrower

The distribution of consumer loans by income level of borrower is adequate in both the Denver and Colorado Springs MAs.

Consumer Loans

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

In both the Denver and Colorado Springs MAs, the percentage of loans to low-income borrowers is adequate. Performance is considered adequate given a 10 percent poverty level in both AAs. The percentage of loans to moderate-income borrowers in both AAs is also adequate and comparable to demographics.

Community Development Lending

Refer to Table 1 Lending Volume in 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.

Our analysis gave positive consideration to community development lending activities. The bank's responsiveness is excellent given its size, lending capacity, and opportunities in the AAs.

In the Denver MA, UMB-CO originated 17 community development loans totaling \$40 million over the evaluation period, including:

- Ten loans totaling \$22 million that revitalize or stabilize low- and moderate-income geographies;
- Five loans totaling \$17 million that promote economic development by financing small businesses; and
- Two loans totaling \$673 thousand that provided community services to low- and moderate-income individuals.

In the Colorado Springs MA, UMB-CO originated five community development loans totaling \$9 million over the evaluation period, including:

- Two loans totaling \$7 million that promote economic development by financing small businesses; and
- Three loans totaling \$2 million that help provide nursing home care for indigent individuals.

Product Innovation and Flexibility

UMB-CO offers several programs that use flexible or innovative underwriting to assist low- and moderate-income individuals or geographies. Products include federal and state subsidized first-time homebuyer and low down payment assistance programs. UMB-CO does not track the volume of loans originated under these programs. Therefore, we were unable to evaluate the impact of product offerings in the AAs.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Colorado is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Denver and Colorado Springs MAs is adequate. Refer to Table 14 in appendix D for the facts and data used to evaluate the bank's level of qualified investments.

In the Denver MA, qualified investments and grants total \$525 thousand. Current period investments total \$475 thousand and prior period investments of \$50 thousand remain outstanding.

During the evaluation period, UMBFC invested an additional \$350 thousand into the UMB CDC for use in the Denver MA. Funds from the UMB CDC were used to purchase two loans from UMB-CO in October 2003. UMB-CO originated these loans in August 2003. One is a refinanced loan, purchased for \$333 thousand, to a nonprofit organization that provides dental health services primarily to low- and moderate-income individuals. Remaining funds from the UMB CDC, including the \$50 thousand prior period investment, were used to purchase a \$59 thousand loan to a borrower to construct a single-family residence in a low-income tract. The impact of the UMB CDC investment is not significant as a majority of the dollar volume involves the purchase of one loan originated during a prior evaluation period that is refinanced approximately every three months.

The remaining current period investments in the Denver MA include donations to various community development organizations totaling \$125 thousand. A majority of these donations, 87 percent by dollar volume, are to agencies that primarily serve low- and moderate-income individuals.

In the Colorado Springs MA, qualified investments and grants total \$905 thousand. Current period investments total \$56 thousand and prior period investments of \$849 thousand remain outstanding.

Current period investments include donations to various community development organizations totaling \$56 thousand. A majority of these donations, 66 percent by dollar volume, are to agencies that primarily provide community services to low- and moderate-income individuals. Another 28 percent of the donations helped revitalize and stabilize low- and moderate-income geographies.

A majority of prior period investments involve three school district bonds that remain outstanding from a prior evaluation period. Two of the school bonds, totaling \$260 thousand, were used to expand a high school in the AA, where a majority of students are from low- and moderate-income families. The remaining \$539 thousand bond helped renovate school buildings. A majority of the buildings are located in low- or moderate-income census tracts.

UMB-CO and the UMB CDC pooled resources to originate the remaining prior period investment in the Colorado Springs MA. Funds were used to make a loan to an affordable housing organization. UMB-CO originated the loan and subsequently sold loan participations to the UMB CDC in two installments. The first installment was in June 2003 for \$25 thousand and the second installment was in October 2003 also for \$25 thousand.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

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 MA is adequate and in the Colorado Springs MA is excellent. Refer to Table 15 in appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Retail Banking Services

UMB-CO's branch delivery system is accessible to essentially all geographies and individuals of different income levels. In the Denver MA, the percentage of branches in moderate-income census tracts is adequate compared to demographics. In addition, one branch located in an upper-income geography is adjacent to a moderate-income census tract. In the Colorado Springs MA, the percentage of branches in moderate-income census tracts is excellent compared to demographics. All bank locations in middle- and upper-income geographies are adjacent to low- or moderate-income census tracts. Based on deposit market share, the

bank's presence in the Colorado Springs MA is more significant at three percent. In the Denver MA, UMB-CO's deposit market share is less than one percent. There are no branches in low-income census tracts of either AA. However, the population percentages in low-income geographies are seven percent and two percent in the Denver and Colorado Springs MAs, respectively.

During the evaluation period, UMB-CO opened one branch in an upper-income census tract in the Denver MA. In the Colorado Springs MA, UMB-CO relocated a branch within the same moderate-income census tract and closed a grocery store branch in an upper-income geography that was unprofitable. UMB-CO did not close any branches in the Denver MA.

The distribution of ATMs helps provide good access to all geographies and individuals of different income levels. In the Denver MA, three (19 percent) of UMB-CO's 16 ATMs are located in moderate-income census tracts. Seven ATMs in middle- and upper-income census tracts are adjacent to low- and moderate-income geographies. Six locations accept deposits and seven have the option of displaying information in either English or Spanish. Our community contact identified Bilingual assistance as an identified need in the Denver MA. In the Colorado Springs MA, three (30 percent) of UMB-CO's 10 ATMs are located in moderate-income census tracts. Five ATMs in middle- and upper-income census tracts are adjacent to low- and moderate-income geographies. Five locations accept deposits and four have Spanish option screens. There are no ATMs in low-income census tracts of either AA.

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

Other alternative delivery systems offered by UMB-CO include:

- Electronic banking: Customers can access deposit accounts to check balances, view transactions, transfer funds, view imaged checks, reorder checks, conduct transfers between accounts and complete a mortgage application 24 hours per day, seven days per week through the bank's Internet site. Bill payment is offered for a fee. Telephone banking services also allow 24-hour access to accounts.
- Tax Freedom Program: Low- and moderate-income users of the bank's Internet site can prepare and file their tax returns at no cost.
- Low-cost checking: Value checking accounts do not have monthly service charges and requires \$100 to open.
- Bank by Mail: Allows customers to mail deposits, payments and messages to the bank.
- Government check cashing services: Customers can cash government checks, regardless of amount. Non-customers may cash government checks up to \$500 for a fee.
- BranchNet: Website development service offered to retail and commercial customers through UMBFC. This service assists customers in expanding their marketing efforts, including the design and maintenance of a website.

In addition, deposit account forms are available in Spanish to serve the growing Hispanic population in both the Denver and Colorado Springs MAs. UMB-CO does not maintain information to demonstrate the effectiveness or impact of alternative delivery systems in low- or moderate-income geographies or the use of these systems by low- and moderate-income individuals. Therefore, these services did not influence the service test performance.

Community Development Services

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

In the Denver MA, bank staff provided their financial expertise to 19 different organizations that promote community development initiatives. Eighteen of the organizations provide community services to low- and moderate-income individuals. This includes an organization with a program that opens Individual Development Accounts for at-risk students with an initial balance of \$50. If the student pursues education after high school, the bank will match money saved at a rate of 50 percent.

In the Colorado Springs MA, bank staff provided their financial expertise to 10 different organizations that promote community development initiatives. Nine of the organizations provide community services to low- and moderate-income individuals. Services provided include food pantries, youth programs and senior citizen programs.

UMB-CO participates in the Colorado Quest program, which allows welfare recipients to withdraw payments by debit card at the bank's ATMs. Electronic Transfer Accounts are offered to individuals who receive periodic payments from the federal government. This supports the government's initiative to improve access to financial services and encourage low- and moderate-income individuals to establish accounts to receive their payments. UMB-CO also participates in the Temporary Aid to Needy Families program in which electronic cards are used to distribute benefits to persons without direct deposit accounts. Recipients can access their benefits through UMB-CO ATMs.

UMB-CO provides accounts to attorneys through the Colorado Lawyer Trust Account Foundation (COLTAF). Interest paid on these accounts by the bank is contributed to the COLTAF fund to help provide legal assistance and education to low- or moderate-income individuals. UMB-CO waives the account fees.

UMB-CO's Capital Markets division utilized their financial expertise to assist with structuring and underwriting a \$5 million community development loan that was placed with a financial services company in 2002. The loan helped with revitalization efforts in a moderate-income census tract. The property is located in an enterprise zone that is undergoing redevelopment.

Bank staff works with nonprofit and government organizations to establish programs that serve low- and moderate-income borrowers via the UMB CDC. UMB-CO's Trust division works with two nonprofit organizations in the Colorado Springs MA and one nonprofit agency in the Denver MA that provide services to low-income individuals.

In addition, the Human Resource department works with the following programs that are specifically designed to help low- and moderate-income individuals find employment:

- Job Corps: Program designed for at-risk young people, ages 16-24. Provides integrated academic, vocational, and social skills training to help participants gain independence and quality jobs.
- Center for Women's Employment and Education: The mission of the organization is to help low-income single parents and families develop and expand skills to gain continuous and meaningful employment

- Welfare to Work and Work Opportunity Tax Credit Programs: Programs assist low- and moderate-income individuals with finding employment.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/00 to 12/31/02 Investment and Service Tests and CD Loans: 11/14/00 to 10/20/03	
Financial Institution	Products Reviewed	
UMB Bank, Colorado, N.A. (UMB-CO) Denver, Colorado	Consumer Loans; Community Development Loan Data; Qualified Investments; Retail and Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
UMB CDC	Subsidiary of UMBFC	Qualified Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Denver MA #2080 Colorado Springs MA #1720	Full-scope Full-scope	

Appendix B: Market Profiles for Full-Scope Areas

Table of Contents

Market Profiles for Areas Receiving Full-Scope Reviews

Denver MA..... B-2
Colorado Springs MA B-3

Denver MA

Demographic Information for Full-Scope Area: Denver MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	498	7%	22%	33%	21%	17%
Population by Geography	1,622,980	7%	24%	43%	26%	0%
Owner-Occupied Housing by Geography	399,963	4%	20%	45%	31%	0%
Businesses by Geography	171,064	8%	21%	37%	34%	<1%
Farms by Geography	2,604	4%	18%	45%	33%	<1%
Family Distribution by Income Level	424,057	19%	19%	24%	38%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	159,032	12%	36%	40%	12%	0%
Median Family Income	= \$40,222	Median Housing Value		= \$89,581		
HUD Adjusted Median Family Income for 2002	= \$69,900	Unemployment Rate (September 2003)		= 5.7%		
Households Below the Poverty Level	=10%					

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

Source: 1990 U.S. Census, 2002 HUD updated MFI, and Bureau of Labor Statistics

The Denver MA consists of the following five contiguous counties in Colorado: Adams, Arapahoe, Denver, Douglas, and Jefferson. Economic conditions in the AA are generally stable. The September 2003 unemployment rate for the Denver MA is 5.7 percent compared to 5.6 percent in Colorado and the national rate of 6.1 percent. Housing costs are high. The median housing value in the Denver metropolitan area rose from \$80 thousand in 1990 to over \$200 thousand in 2000.

Major industries in the AA include services, retail trade, finance, and construction. The largest employers in the Denver MA represent a diverse cross-section of industries including aerospace, telecommunications, financial services, airlines and computers. Competition is strong from numerous financial institutions and mortgage companies. Several geographies throughout the AA are designated as Enterprise Zones, Redevelopment Zones, or Blighted Areas by the State of Colorado.

We performed one community contact in this AA. Identified needs include affordable housing loans, financial management education and bilingual assistance in both Spanish and English due to a large growth in the Hispanic population.

Colorado Springs MA

Demographic Information for Full-Scope Area: Colorado Springs MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	84	2%	32%	44%	21%	0%
Population by Geography	397,014	2%	26%	44%	28%	0%
Owner-Occupied Housing by Geography	84,307	1%	19%	46%	34%	0%
Businesses by Geography	35,473	2%	28%	36%	34%	0%
Farms by Geography	726	1%	20%	49%	30%	0%
Family Distribution by Income Level	104,914	18%	20%	23%	39%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	39,513	3%	39%	44%	14%	0%
Median Family Income = \$33,932		Median Housing Value = \$82,238				
HUD Adjusted Median Family Income for 2002 = \$56,800		Unemployment Rate (September 2003) = 5.8%				
Households Below the Poverty Level = 10%						

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

The Colorado Springs MA consists of El Paso County. Economic conditions are generally stable. The September 2003 unemployment rate for the Colorado Springs MA is 5.8 percent compared to 5.6 percent in Colorado and the national rate of 6.1 percent.

Population growth has slowed. The decline is primarily due to changes in the Department of Defense (DOD) as troops continue deployment. Approximately one-third of the population is related to the DOD. Several large military installations are in the AA, including Fort Carson Army Base, Peterson Air Force Base, and the U.S. Air Force Academy. Major industries in the AA include services and retail trade. Competition from other financial institutions is strong.

We performed one community contact in this AA. The contact stated that start-up businesses are always looking for venture capital loans; however, obtaining credit is not a problem as prudent financing is available.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: 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. Tables without data are not included in this PE.

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans.
- 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.
- Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME												Geography: COLORADO		Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002	
MA/Assessment Area (2002):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)				
Full Review:															
Denver MA	67.29	16	311	269	52,472	1	190	17	40,430	299	93,403	55.45			
Colorado Springs MA	32.71	23	1,077	113	19,974	3	506	5	9,150	144	30,707	44.55			

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

** The evaluation period for Community Development Loans is From November 14, 2000 to October 20, 2003.

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

Table 1a. Other Products

LENDING VOLUME		Geography: UMBCO TEST				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002						
MA/Assessment Area (2002):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Home Equity**		Motor Vehicle**		Other Secured Consumer**		Other Unsecured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Denver MA	91.05	4,374	91,986	67	7,057	4,228	79,080	45	5,108	34	741	55.45
Colorado Springs MA	8.95	430	10,973	42	3,642	334	5,102	39	1,807	15	422	44.55

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

** The evaluation period for Optional Product Line(s) is From January 01, 2000 to December 31, 2002.

*** Deposit Data as of June 30, 2000. 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: COLORADO					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Denver MA	0	0.00	3.67	0.00	19.89	0.00	45.25	0.00	31.19	0.00	0.00	0.00	0.00	0.00	0.00									
Colorado Springs MA	2	100.00	1.30	0.00	18.80	0.00	45.72	50.00	34.18	50.00	0.00	0.00	0.00	0.00	0.00									

* Based on 2001 Peer Mortgage Data: Western Region.

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: COLORADO					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Denver MA	13	44.83	3.67	0.00	19.89	0.00	45.25	76.92	31.19	23.08	0.04	0.00	0.00	0.04	0.08									
Colorado Springs MA	16	55.17	1.30	0.00	18.80	18.75	45.72	56.25	34.18	25.00	0.03	0.00	0.00	0.06	0.00									

* Based on 2001 Peer Mortgage Data: Western Region.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: COLORADO															
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002															
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
Full Review:															
Denver MA	3	37.50	3.67	0.00	19.89	0.00	45.25	0.00	31.19	100.00	0.00	0.00	0.00	0.00	0.00
Colorado Springs MA	5	62.50	1.30	0.00	18.80	20.00	45.72	60.00	34.18	20.00	0.01	0.00	0.00	0.01	0.01

* Based on 2001 Peer Mortgage Data: Western Region.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY																	
Geography: COLORADO																	
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002																	
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*						
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:																	
Denver MA	0	0.00	12.36	0.00	35.84	0.00	40.34	0.00	11.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Colorado Springs MA	0	0.00	3.07	0.00	38.12	0.00	36.85	0.00	21.96	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Mortgage Data: Western Region.

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: COLORADO															
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ⁷				
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Denver MA	269	70.42	7.79	17.23	20.66	19.85	37.35	20.22	33.92	42.70	0.23	0.43	0.20	0.16	0.29
Colorado Springs MA	113	29.58	2.01	0.00	27.87	45.13	36.05	38.05	34.07	16.81	0.44	0.00	0.68	0.50	0.26

⁷ Based on 2001 Peer Small Business Data: US&PR.

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

^{***} Source Data - Dun and Bradstreet (2002).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: COLORADO															
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Denver MA	1	25.00	3.57	0.00	18.43	0.00	44.82	0.00	32.95	100.00	0.00	0.00	0.00	0.00	0.00
Colorado Springs MA	3	75.00	1.24	0.00	19.97	33.33	49.31	66.67	29.48	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Small Business Data: US&PR.

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

*** Source Data - Dun and Bradstreet (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE																	
Geography: COLORADO																	
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002																	
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:																	
Denver MA	0	0.00	18.79	0.00	18.71	0.00	24.56	0.00	37.94	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Colorado Springs MA	2	100.00	18.03	50.00	19.64	0.00	23.31	0.00	39.02	50.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Mortgage Data: Western Region.

** As a percentage of loans with borrower income information available. Income information was available for all loans originated and purchased by the bank.

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

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT																
Geography: COLORADO																
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002																
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid
Full Review:																
Denver MA	13	44.83	18.79	15.38	18.71	15.38	24.56	38.46	37.94	30.77	0.04	0.00	0.00	0.08	0.04	
Colorado Springs MA	16	55.17	18.03	0.00	19.64	6.25	23.31	50.00	39.02	43.75	0.03	0.00	0.00	0.00	0.05	

* Based on 2001 Peer Mortgage Data: Western Region.

** As a percentage of loans with borrower income information available. Income information was available for all loans originated and purchased by the bank.

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: COLORADO					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Denver MA	3	37.50	18.79	0.00	18.71	33.33	24.56	0.00	37.94	66.67	0.00	0.00	0.00	0.00	0.00									
Colorado Springs MA	5	62.50	18.03	0.00	19.64	0.00	23.31	20.00	39.02	80.00	0.01	0.00	0.00	0.02	0.02									

* Based on 2001 Peer Mortgage Data: Western Region.

** As a percentage of loans with borrower income information available. Income information was available for all loans originated and purchased by the bank.

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: COLORADO			Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share *	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Denver MA	269	70.42	63.51	34.78	56.13	17.47	26.40	0.23	0.25
Colorado Springs MA	113	29.58	67.87	46.22	56.64	21.24	22.12	0.44	0.52

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.76% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: COLORADO			Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share *	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Denver MA	1	25.00	89.98	100.00	0.00	100.00	0.00	0.00	0.00
Colorado Springs MA	3	75.00	91.87	100.00	66.67	0.00	33.33	0.00	0.00

* Based on 2001 Peer Small Business Data: US&PR.

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2002).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. Income information was available for all loans originated and purchased by the bank.

Table 13. Geographic and Borrower Distribution of Consumer Loans

Geographic and Borrower Distribution: CONSUMER LOANS																		
Geography: COLORADO																		
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002																		
MA/Assessment Area:	Geographic Distribution										Borrower Distribution							
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans
Full Review:																		
Denver MA	4,374	91.05	7.03	2.45	25.91	9.81	43.37	38.27	23.69	49.25	22.11	7.42	16.74	14.70	20.59	22.90	40.56	54.98
Colorado Springs MA	430	8.95	1.83	0.00	25.93	13.02	44.27	44.19	27.96	42.79	20.46	7.53	18.62	17.20	21.36	23.39	39.55	51.88

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

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: COLORADO		Evaluation Period: NOVEMBER14, 2000 TO OCTOBER 20, 2003				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Denver MA	1	50	22	475	23	525	36.69	0	0
Colorado Springs MA	4	849	13	57	17	906	63.31	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: COLORADO				Evaluation Period: NOVEMBER 13, 2000 TO OCTOBER 20, 2003									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Denver MA	55.45	6	54.55	0.00	16.67	16.67	66.66	1	0	0	0	0	+1	6.86	23.97	43.35	25.82
Colorado Springs MA	44.55	5	45.45	0.00	40.00	20.00	40.00	1	2	0	0	0	-1	1.81	25.89	44.03	28.27