



**LARGE BANK**

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**Office of the Comptroller of the Currency**

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Washington, DC 20219

**PUBLIC DISCLOSURE**

June 04, 2012

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

UMB Bank, National Association  
Charter Number: 23920

1010 Grand Avenue  
Kansas City, MO 64106

Office of the Comptroller of the Currency

Midsized Bank Supervision  
250 E Street, SW  
Washington, DC 20219-0001

**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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## General Information and Overall CRA Rating

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

This document is an evaluation of the CRA performance of UMB Bank, National Association issued by the OCC, the institution’s supervisory agency, for the evaluation period ending June 4, 2012. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

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

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

Performance Levels	UMB, National Association 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:

- The OCC considered discriminatory or other illegal credit practices in rating the bank’s performance. As a result of these findings, and after consideration of the nature, extent, and strength of the evidence of the practices; the extent to which institution had policies and procedures in place to prevent the practices; the extent to which the institution has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information, the CRA Performance Evaluation rating was lowered from Outstanding to Satisfactory.
- The bank’s lending activity is good, with a significant majority of loans within the bank’s AAs.

- The bank's overall geographic distribution of loans is excellent, considering economic conditions during the evaluation period. The bank demonstrated excellent small loans to businesses and small loans to farms performance (only relevant to the State of Missouri) and good home mortgage loan performance;
- The bank's overall borrower distribution is excellent, considering economic conditions during the evaluation period. The bank demonstrated good home mortgage performance; excellent small loans to farms performance (only relevant to the State of Missouri); and adequate small loans to business performance;
- Excellent community development lending had a significantly positive impact on the lending test rating. The predominant loan product was working capital for businesses that were presumed to retain jobs. The level of CD lending and commitment to meeting multiple community development needs supported an overall good lending;
- An overall excellent level of qualified investments, which are responsive to AAs credit and community needs; and,
- UMB's service delivery systems provide adequate access to low- and moderate-income geographies and individuals. The overall level of CD services is adequate.

## Definitions and Common Abbreviations

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

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

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

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

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**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 conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), 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 MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of

individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Description of Institution

UMB Bank, National Association (UMB) is a \$15 billion interstate financial institution headquartered in Kansas City, Missouri. UMB is a wholly owned subsidiary of UMB Financial Corporation (UMBFC), a \$16 billion regional, multi-bank holding company also headquartered in Kansas City, Missouri. UMBFC operates three other national banks, and one trust company, with locations throughout Missouri, Kansas, Illinois, Oklahoma, Nebraska, Colorado, and Arizona. The company is also engaged in various other financial services, including brokerage and insurance.

The following affiliates provided information for consideration under the Investment Test: Kansas City Financial Corporation, UMB Community Development Corporation (CDC), and UMB Financial Corporation Charitable Foundation. The Kansas City Financial Corporation holds the investment portfolio and the UMB Financial Charitable Foundation is a nonprofit that was formed in 2007 to facilitate donations throughout the company. The UMB CDC was discontinued in 2009; however, continues to hold an existing portfolio of loans.

UMB is a full-service banking institution offering a wide variety of retail and commercial banking services. The primary lending focus is commercial lending. Significant lines of business include investment and cash management, trust, correspondent banking, and international banking services. As of March 31, 2012, UMB's loan portfolio, by dollar volume consisted of 69 percent commercial, 14 percent residential real estate, 9 percent consumer, 4 percent agriculture, and 4 percent other loans. Net loans represent 38 percent of total assets. Net Tier One Capital is \$663 million.

UMB operates 104 branches throughout 19 assessment areas (AAs) in the states of Missouri, Kansas, Illinois, Oklahoma and Nebraska. The AAs consist of two multistate metropolitan areas in Kansas City and St. Louis; five metropolitan areas in Missouri: Joplin, St. Joseph, Springfield, Columbia, and Jefferson City; three metropolitan areas in Kansas: Wichita, Topeka, and Lawrence; two metropolitan areas in Oklahoma: Oklahoma City and Tulsa, and one metropolitan area in Omaha, Nebraska. In addition, UMB has non-metropolitan AAs: four in Missouri and two in Kansas.

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

UMB offers flexible loan programs that assist LMI individuals and small farmers. Home mortgage loan programs provide down payment assistance and provide qualified persons with refinancing options at a lower rate. UMB also participates in the Small Business Development Beginning Farmer Loan Program.

UMB provides alternative delivery systems such as electronic banking and bank by mail services. The bank also offers a Tax Freedom Program that allows LMI users of their Internet site to prepare and file tax returns at no cost. UMB does not maintain information to demonstrate the effectiveness or impact of alternative delivery systems in low- or moderate-income geographies or use of these systems by low- and moderate-income individuals.

UMB Bank Warsaw, N.A. merged into UMB on December 8, 2007. HMDA and CRA data from the Warsaw bank is included in information considered during this examination. The Warsaw bank received a "Satisfactory" rating in its last CRA Performance Evaluation dated August 18, 2003.

There are no legal, financial, or other factors that impede the bank's ability to help meet its credit needs in its assessment areas. However, the evaluation period included some of the most difficult years for banks during and following the recession, when significant declines in property values and household incomes impeded lending activities. UMB received an "Outstanding" rating at its last CRA examination dated April 23, 2007.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for the Lending Test, excluding community development (CD) loans, is January 1, 2007 to December 31, 2011. The evaluation period included some of the most difficult years for banks during and following the recession, when significant declines in property values and household incomes impeded lending activities. We considered those conditions in assigning the overall rating, particularly in areas more severely impacted by the recession. Our analysis did not include multifamily home mortgage loans, as the number of reported loans for this product type was insufficient for meaningful analysis in all AAs. However, we did consider multifamily loans meeting the CD definition as part of the evaluation of CD lending. In conducting our analysis, we analyzed loan products in which the bank originated at least 20 loans within an AA during the evaluation period.

For CD loans, the Investment Test and Service Test, the evaluation period is from April 24, 2007 to June 4, 2012. The Investment Test included a review of investments and donations originated in the bank's AAs that meet the definitions of CD investments. At the bank's request, we considered qualified investments made by affiliates. The Service Test included a review of retail and CD services provided in the bank's AAs.

In those areas where the bank adequately addressed its community development needs in its AAs, consideration is given to CD activities made in a broader statewide area that includes the bank's AAs. Some of the activities have potential to benefit its AAs and others have no potential to benefit its AAs. These activities are discussed under the Lending Test (refer to Table 1) and Investment Test (refer to Table 14).

We used deposit information, reported to the Federal Deposit Insurance Corporation (FDIC) annually, to determine the bank's deposit market share and rank within its AAs. The most recent deposit information available is as of June 30, 2011.

### Data Integrity

We verified the accuracy of 2007 through 2011 Home Mortgage Disclosure Act (HMDA) reportable loans, small loans to businesses and small loans to farms. We also reviewed all CD loan, investment and service information submitted by management which met the CD definition in this evaluation.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, a sample of assessment areas (AAs) within that state was selected for full-scope review. Refer to the "Scope" section under each State Rating section for details regarding how the full scope areas were selected. The two multistate metropolitan areas, Kansas City Mo-KS and St. Louis MO-IL, were considered as a whole with no breakdown of the multistate areas into separate metropolitan areas and as a result both are considered full scope areas.

## Ratings

The bank's overall rating is a blend of the multistate metropolitan area rating(s) and state ratings. CRA performance in the Kansas City multistate metropolitan area (MA) received the most weight. This area constitutes 69 percent of the bank's total deposit base and 38 percent of total reported loans (by number) during the evaluation period.

The state of Missouri received the next highest weighting followed by the St. Louis multistate MA. The state of Missouri constitutes 11 percent of total deposits and 28 percent of total reported loans (by number). The St. Louis multistate MA represents 13 percent of total deposits and 15 percent of total reported loans (by number).

The states of Kansas, Oklahoma, and Nebraska received the least weight in our analysis, respectively. The state of Kansas represents four percent of total deposits and 11 percent of total reported loans (by number). The state of Oklahoma represents two percent of total deposits and 6 percent of the number of total reported loans. The state of Nebraska represents one percent of total deposits and two percent of the number of total reported loans.

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

Based on loan volume over the evaluation period, with the exception of the Missouri (MO) non-MSA AA, small loans to businesses received the greatest weight. In the MO non-MSA AA, small loans to farms received the greatest weight. Home mortgage loans received lesser weight. Within home mortgage loans, home refinance loans received the greatest weight, followed by home improvement and home purchase loans.

### ***Lending Test - Inside/Outside Ratio***

We performed an analysis of the inside/outside ratio at the bank level. Information includes bank originations and purchases only and does not include extensions of credit by affiliates that are being considered under the other performance criteria.

A majority of UMB's loans were originated within the bank's defined AAs. For all lending combined, the bank originated 73 percent (by number) and 80 percent (by dollar) within the AAs. This positively impacts the bank's lending test performance.

For home purchase loans, 78 percent (by number) and 70 percent (by dollar) were originated within the AAs. Home improvement loans originated within the AAs totaled 89 percent (by number) and 84 percent (by dollar). The percentage of home refinance loans within the AAs were 82 percent (by number) and 75 percent (by dollar). For small loans to businesses, 65 percent (by number) and 85 percent (by dollar) were originated within the AAs.

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

Pursuant to 12 C.F.R. § 25.28(c) or § 195.28(c), respectively, in determining a national bank's or Federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC identified the following public information regarding non-compliance with the statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution.

- Unfair acts or practices concerning billing practices for identity theft protection services in violation of section 5 of the Federal Trade Commission Act. The bank agreed to a \$1.5 million civil money penalty and entered into a settlement agreement with the OCC, based on OCC findings that the bank billed its customers for the full fee of an identity theft protection product, offered through the bank's vendor, even though not all of those customers were receiving the services of the product. The bank ceased offering the identity theft product in 2013 and will be required to provide over \$1.3 million in remediation to over 6,000 customers who were harmed by these practices. For further information on this settlement, see OCC Enforcement Actions AA-EC-2017-15 and AA-EC-2017-16.

The OCC also found evidence of violations of the Servicemembers Civil Relief Act. The bank failed to provide full interest rate reductions on 41 loans to eligible servicemembers. The bank paid restitution totaling \$4,706 to affected borrowers covering the period of January 1, 2007 through March 31, 2012. The bank implemented appropriate corrective actions to strengthen policies, procedures, and controls prospectively.

As a result of these findings, and after consideration of the nature, extent, and strength of the evidence of the practices; the extent to which the institution had policies and procedures in place to prevent the practices; the extent to which the institution has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information, the CRA Performance Evaluation rating was lowered from Outstanding to Satisfactory.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## Multistate Metropolitan Area Rating

### Kansas City MO-KS

<b>CRA rating for the Kansas City MO-KS MA<sup>1</sup>:</b>	<b>Outstanding</b>
<b>The lending test is rated:</b>	<b>Outstanding</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include:

- Lending test performance is excellent. Overall lending activity and the overall geographic distribution of loans are good. The overall borrower distribution of loans is adequate. The level of community development lending is excellent and had a significantly positive impact on the lending test rating, supporting an excellent lending performance.
- Investment test performance is excellent. A substantial majority of the investment dollars supports affordable housing initiatives and services to low- and moderate-income individuals. Affordable housing is an identified community need.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels. Bank personnel provided a good level of community development services during the evaluation period.

### Description of Institution's Operations in Kansas City MO-KS

UMB operates 38 branches and 174 ATMs in the Kansas City MO-KS AA. Commercial lending is the primary business focus. This AA represents 69 percent of the bank's total deposit base and 38 percent of total reported loans (by number) during this evaluation period. In addition, 45 percent of the dollar volume of total loans is in this AA. Competition is strong and includes 117 financial institutions. UMB ranks first in deposit market share at 14.62 percent. Primary competitors are Commerce Bank, Bank of America, and U.S. Bank.

Refer to the market profile for Kansas City MO-KS in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

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

## **Scope of Evaluation in Kansas City MO-KS**

We performed a full-scope review in the Kansas City MO-KS AA. Ratings are based on the results of performance in this AA. Refer to the table in Appendix A for more information.

In the Kansas City AA, small loans to businesses represents 58 percent of the number of total reported loans in the AA. Home mortgage lending represents 41 percent of the total reported loans, with home refinancing accounting for 48 percent of total home mortgage lending, followed by home improvement loans at 28 percent and purchases at 23 percent. Small farm lending analysis was not meaningful as this product represented less than one percent of the number of total reported loans in the AA. Small farm lending is not an identified credit need for this AA.

We conducted one community contact in this AA with an economic development organization. Identified community needs are affordable housing and loans to assist small businesses and nonprofit organizations. In addition, bank identified community needs are financial assistance programs and community services for youth from low- and moderate-income families.

## **LENDING TEST**

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

The bank's performance under the lending test in the Kansas City MO-KS AA is rated "Outstanding."

### **Lending Activity**

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

Lending activity is good in relation to area credit needs and the bank's commercial lending focus versus retail lending.

UMB has a deposit market share of 14.62 percent, which ranks first in the Kansas City AA. For small loans to businesses, UMB ranks 8<sup>th</sup> (by number) and 1<sup>st</sup> (by dollar volume) at 3.86 percent and 15.58 percent, respectively. The top six lenders in the market represent nationwide credit card companies with a combined market share of 65.95 percent.

There is strong competition for home mortgage loans. For home purchase and home refinance loans, market share is 0.66 percent (ranked 29<sup>th</sup>) and 0.82 (ranked 23<sup>rd</sup>) percent, respectively. For home refinance loans and home purchase loans, there are 395 and 390 lenders in the AA, respectively. Bank rankings for both home refinance and home purchase loans are in the top 10 percent in the market. For home improvement loans, the market share is 1.52 percent, which ranks 17<sup>th</sup> (by number). For home

improvement loans, UMB ranks within the top 15 percent of lenders in the market. For home refinance, home improvement, and home purchase loans, the top five lenders in the market accounted for 40.17 percent, 35 percent, and 42.35 percent, respectively.

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

The overall geographic distribution of loans is good.

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

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

The geographic distribution of home mortgage loans is adequate. Home refinance loans received the most weight in our analysis since they represent 48 percent of the bank's total home mortgage lending (by number). The next highest weight was placed on home improvement followed by home purchase loans, which are 28 percent and 23 percent of total home mortgage lending, respectively.

The geographic distribution of home purchase loans is adequate when considering market share performance. The distribution of loans in low-income geographies was well below the percentage of owner-occupied units in these geographies. The distribution of loans in moderate-income geographies was below the percentage of owner-occupied units in these geographies. The bank's market share in both low- and moderate-income geographies exceeded its overall home purchase market share.

The geographic distribution of home improvement loans is poor. The distribution of loans in low-income geographies was significantly below the percentage of owner-occupied units in these geographies. The distribution of loans in moderate-income geographies was below demographics. UMB's market share in moderate-income geographies exceeded its overall market share, but UMB did not have any market share in low-income geographies.

The geographic distribution of home refinance loans is adequate when considering market share performance. The distribution of loans in low income geographies was significantly below the percentage of owner-occupied units in these geographies. The distribution of loans in moderate-income geographies was below the percentage of owner-occupied units in these geographies. The bank's market share in both low- and moderate-income geographies exceeded its overall home refinance market share.

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

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

The geographic distribution of small loans to businesses is excellent. UMB's percentage of loans in both low- and moderate-income tracts exceeded demographics. In addition, the market share in both low- and moderate-income tracts exceeded the bank's overall market share for these loans.

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

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

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

We performed an analysis of the inside/outside ratio at the bank level. A majority of UMB's loans were originated within the bank's defined AAs. Refer to Evaluation Scope for additional detail on the bank's performance.

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

The overall borrower distribution of loans is adequate.

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

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

The distribution of home mortgage loans to borrowers of different income levels is good.

The borrower distribution of home purchase loans is good. The percentage of loans to low-income borrowers was near to the percentage of such families and is considered good. The percentage of loans to moderate-income borrowers is excellent and exceeded demographics. The bank's market share to both low- and moderate-income borrowers was near to its overall home purchase market share.

The borrower distribution of home improvement loans is good. The percentage of loans to low-income borrowers was below the percentage of families and considered adequate. The percentage of loans to moderate-income borrowers was excellent and exceeded demographics. Market share in low-income geographies was below the overall market share for home improvement loans, but the market share in moderate-income geographies exceeded the overall market share for these loans.

The borrower distribution of home refinance loans is good. The percentage of loans to low-income borrowers was below the percentage of such families and considered adequate. The percentage of loans to moderate-income borrowers exceeded demographics and was considered excellent. The market share of loans to both low- and moderate-income borrowers exceeded the overall market share for these loans.

### **Small Loans to Businesses**

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

The distribution of small loans to businesses of different sizes is adequate when considering market share performance. UMB's percentage of loans to businesses with revenues of \$1 million or less was significantly below the demographics. The market share of loans to small businesses is excellent, with revenues of \$1 million or less exceeded the bank's overall market share.

### **Community Development Lending**

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

CD lending had a significantly positive impact on the lending performance in the Kansas City AA. UMB's CD lending is excellent given its size, lending capacity and area opportunities. The bank originated 205 CD loans totaling \$691 million during the evaluation period.

Approximately 85 percent of both the number and dollar volume of loans helped promote economic development through the financing of small businesses. A majority of these loans provided working capital for small businesses that were presumed to retain jobs for low- and moderate-income persons.

In addition, 10 percent of the number of loans and four percent by dollar volume were to organizations that provide community services to LMI individuals. These loans helped provide financial stability, food, housing, healthcare, and assistance with utility bills. Five percent of the number of loans and 11 percent by dollar volume helped revitalize and stabilize low- and moderate-income geographies

### **Product Innovation and Flexibility**

UMB offers flexible loan programs that assist LMI individuals and small farmers. Home mortgage loan programs provide down payment assistance and provide qualified persons with refinancing options at a lower rate. UMB also participates in the Small Business Development Beginning Farmer Loan Program. The impact on the lending test rating is neutral since the bank does not track performance or the responsiveness to the community.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the Kansas City MO-KS AA is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Kansas City MO-KS AA is excellent.

Refer to Table 14 in the Kansas City MO-KS AA section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

UMB and its affiliates provided an excellent level of qualified investments in the Kansas City AA. The bank made 314 investments during the evaluation period, which totaled \$34.9 million. Including prior period investments, this total is \$50.5 million and represents 56 percent of total CD investments for the bank. The total CD investments in the AA represents 11 percent of Tier One Capital allocated to the area. The investments are generally non-complex. UMB's responsiveness to CD needs are good and helps meet affordable housing needs and provides services to LMI individuals and families in the AA.

UMB provided the following current period investments in the Kansas City MO-KS AA.

- \$15 million invested in mortgage loan pools comprised of home loans to LMI borrowers;
- \$10 million invested in bond issuances benefiting local school districts in low- and moderate-income areas in the Kansas City AA. Proceeds were used for constructing, equipping and furnishing additional classrooms as well as upgrading heating and cooling systems in designated schools that predominantly serve low- and moderate-income families; and
- \$8.7 million consisting of various equity investments for affordable housing projects, loans to borrowers eligible for Small Business Investment Company (SBIC) financing, and funding to finance the construction of a hotel in a designated redevelopment area.
- The remaining balance of \$1.2 million represents donations to various organizations that primarily provide targeted services for low-and moderate-income individuals throughout the AA. Donations include \$25 thousand from the bank's affiliate, UMB Charitable Trusts & Foundation, to an organization that provides targeted services for low and moderate-income individuals and families.

Prior period investments of \$15.6 million continue to support a complex redevelopment plan the bank initiated during a prior evaluation period. This involved the construction of an office building in an area designated for redevelopment that provides jobs targeted to LMI individuals. An additional \$285 thousand investment helped finance SBICs that promote economic development by financing small businesses. Dollar amounts represent the book value at the end of the evaluation period. UMB's Corporate Trust

Division administers approximately \$1.4 billion in housing related bonds of which \$659 million are Missouri Housing Development Commission bonds specifically designed to address affordable housing needs. This information is provided for informational purposes only.

## **SERVICE TEST**

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

The bank's performance under the service test in the Kansas City MO-KS MA is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Kansas City MO-KS AA is adequate.

### **Retail Banking Services**

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

UMB's delivery systems are reasonably accessible to all portions of the Kansas City AA. Branch distribution is adequate. The bank has one branch in a low-income geography. The percentage of branches in low-income tracts was below demographics. The bank has six branches in moderate-income geographies. The percentage of branches in moderate-income tracts was near to the demographics.

Branch openings and closings did not generally adversely affect the accessibility of the bank's delivery systems to low- and moderate-income geographies or individuals. During the evaluation period, UMB opened five and closed six branches. Branch closings were due to low volumes of business activity.

Two branches were opened and one branch was closed in moderate-income tracts. Two branches were opened in middle-income tracts and one opened in an upper-income tract. Five branches were closed in middle-income tracts. In September 2009, UMB opened a new branch in Olathe, Kansas and in August 2011 they opened a branch in the Nutter Ivanhoe Community Center, both of which are located in moderate-income census tracts. The branches provide access to financial education and retail services for persons that reside in LMI census tracts, however, the community center branch provides limited services and does not handle cash transactions. UMB has two branches within two miles of the moderate-income geography where a branch was closed in October 2010.

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

Refer to the Description of Institution section of this document for detail regarding UMBs other alternative delivery systems. The impact on the service test rating is neutral since

the bank does not maintain information to demonstrate the effectiveness or impact of alternative delivery systems in serving LMI segments of the community.

## **Community Development Services**

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

UMB bank staff provided their financial expertise to 100 different organizations that promote community development initiatives in the AA. This involved over 150 bank employees. A majority of the organizations provide community services such as food pantries, job training, and health care. Other community development services helped revitalize and stabilize LMI geographies, provide assistance to small businesses and provide affordable housing. Following are some examples of CD services provided by employees:

- Bishop Sullivan Center – the organization operates the largest food pantry in Kansas City, Missouri and provides job training, no interest car loans, and grade school tutoring for low- and moderate-income individuals. Employees assist with fundraising activities.
- Catholic Charities of Kansas City – provides services targeted to low- and moderate-income individuals such as soup kitchens, medical services, and affordable housing. Employees provide financial advice and assist with fundraising activities.
- Kansas City Equity Fund – provides funds for affordable housing. Employees provide financial services via membership on the Financial Advisory Board and assist with fundraising activities.
- Missouri Business Women’s Center – SBA accredited organization that provides technical assistance on financial matters to groups that provide loans to small businesses and farms. Employees provide financial assistance via membership on the Board of Directors.

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

## Multistate Metropolitan Area Rating

### St. Louis MO-IL

<b>CRA rating for the St. Louis MO-IL MA<sup>2</sup>:</b>	<b>Outstanding</b>
<b>The lending test is rated:</b>	<b>Outstanding</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include:

- Lending performance is excellent. The overall volume of lending and the overall geographic and borrower distribution of loans are good. The level of community development lending is excellent and had a significantly positive impact on the bank's lending test rating.
- Investment test performance is excellent. A substantial majority of investment dollars support affordable housing initiatives, which is an identified community need.
- Delivery systems are reasonably accessible to essentially all portions of the institutions AA. Bank personnel provided a relatively high level of community development services during the evaluation period.

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

UMB operates 22 branches and 69 ATMs in the St. Louis AA. Commercial lending is the primary business focus. This AA represents 12 percent of the bank's total deposit base and 16 percent of total reported loans (by number) during this evaluation period. In addition, 19 percent of the dollar volume of total reported loans is in this AA. Competition is strong and includes 106 financial institutions. UMB ranks 13<sup>th</sup> in deposit market share at 1.64 percent. Primary competitors are U.S. Bank, Bank of America, Scottrade Bank, and Commerce Bank.

Refer to the market profile for St. Louis MO-IL in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

### Scope of Evaluation in St. Louis MO-IL

We performed a full-scope review in the St. Louis MO-IL AA. Ratings are based on the results of performance in this AA. Refer to the table in Appendix A for more information.

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

In the St. Louis MO-IL AA, small loans to businesses represents 51 percent of the number of total reported loans in the AA. Home mortgage lending represents 48 percent of the total reported loans, with home improvement accounting for 60 percent of total home mortgage lending, followed by refinance loans at 29 percent and home purchase loans at 11 percent. Small farm lending analysis was not meaningful as this product represented less than one percent of the number of total reported loans in the AA. Small farm lending is not an identified credit need for this AA.

To identify community credit needs, we considered two community contacts conducted by OCC staff within the last 12 months. Contacts were made with affordable housing organizations in the AA. These contacts identified the following community needs: home equity lines of credit, helping the unbanked build credit, small business loans, and foreclosure prevention counseling. UMB also identified affordable housing as a community need.

## **LENDING TEST**

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

The bank's performance under the lending test in the St. Louis MO-IL AA is rated "Outstanding."

#### **Lending Activity**

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

Lending levels are good in relation to area credit needs, primarily small business, and management's strategic focus on commercial lending.

UMB has a deposit market share of 1.64 percent, which ranks 13<sup>th</sup> in the St. Louis AA, and is in the 12<sup>th</sup> percentile. For small loans to businesses, UMB ranks 18<sup>th</sup> (by number) and 12<sup>th</sup> (by dollar volume) at 1.20 percent and 3.07 percent, respectively. The top six lenders in the market represent nationwide credit card companies with a combined market share of 62.21 percent.

For home purchase, home refinance, and home improvement loans, market share is 0.11 percent (ranked 83<sup>rd</sup>), 0.13 percent (ranked 85<sup>th</sup>), and 0.17 percent (ranked 86<sup>th</sup>), respectively. For home purchase and home refinance loans, there are 386 and 472 lenders in the AA, respectively, reflecting strong competition. In the market, the bank is in the top 20 percent for home refinance loans, the top 25 percent for home purchase loans, and the top 50 percent for home improvement loans of lenders in the market. For home purchase, home refinance, and home improvement loans, the top five lenders in the market accounted for 39.12 percent, 37.27 percent, and 25.77 percent, respectively.

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

The overall geographic distribution of loans is good.

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

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

The geographic distribution of home mortgage loans is adequate.

The geographic distribution of home purchase loans is adequate. UMB did not originate any home purchase loans in low-income census tracts. The percentage of loans in moderate-income geographies exceeded the demographics in those geographies. Additionally, the market share in moderate-income geographies exceeded the overall home purchase market share.

The geographic distribution of home improvement loans is adequate. Lending in low-income census tracts was below the demographics. Lending in moderate-income tracts is below the demographics. The bank did not achieve a market share in either low- or moderate-income geographies.

The geographic distribution of home refinance loans is poor. UMB did not originate any home refinance loans in low-income census tracts. The percentage of loans in moderate-income geographies was below the demographics in those geographies. The market share in moderate-income geographies exceeded the overall home refinance market share.

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

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

The geographic distribution of small loans to businesses is excellent. UMB's percentage of loans in both low- and moderate-income geographies exceeded the demographics. In addition, the market share in both low- and moderate-income geographies exceeded the bank's overall market share for these loans.

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

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

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

We performed an analysis of the inside/outside ratio at the bank level. A majority of UMB's loans were originated within the bank's defined AAs. Refer to Evaluation Scope for additional detail on the bank's performance.

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

The overall borrower distribution of loans is good.

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

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

The distribution of home mortgage loans to borrowers of different income levels is excellent.

The borrower distribution of home purchase loans is excellent. The percentage of loans to low-income borrowers was near to the demographics. The percentage of loans to moderate-income borrowers exceeded the demographics. The market share to low-income borrowers exceeded the overall market share. The market share to moderate-income borrowers was near to the overall market share.

The borrower distribution of home improvement loans is good. The percentage of loans to low-income borrowers was below the demographics. The percentage of loans to moderate-income borrowers exceeded the demographics. The bank did not achieve a market share to low-income borrowers. The market share to moderate-income borrowers exceeded the overall market share.

The borrower distribution of home refinance loans is excellent. The percentage of loans to low-income borrowers was considered good. The percentage of loans to moderate-income borrowers exceeded the demographics. Additionally, both the low- and moderate-income market shares exceeded the overall market share.

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

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

The distribution of small loans to businesses of different sizes is adequate when considering market share performance. UMB's percentage of loans to businesses with revenues of \$1 million or less was well below the demographics. However, market share performance was good. The market share of loans to small businesses with revenues of \$1 million or less was near to the bank's overall market share.

## **Community Development Lending**

Refer to Table 1 Lending Volume in the Kansas City and St. Louis Multistate MO-IL section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending

data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

CD lending had a significantly positive impact on the lending performance in the St. Louis AA. UMB's CD lending is excellent given its size, lending capacity and area opportunities. The bank originated 132 CD loans totaling \$484 million during the evaluation period.

Approximately 70 percent of the number and 82 percent of the dollar volume of loans helped promote economic development through the financing of small businesses. A majority of these loans provided working capital for small businesses that were presumed to retain jobs for low- and moderate-income persons.

In addition, 22 percent of the number of loans and 14 percent by dollar volume were to organizations that provide community services to LMI individuals. These loans helped provide shelter to homeless youth and families, job training, healthcare, and other social services to LMI individuals. Seven percent of the number of loans and three percent by dollar volume helped provide affordable housing. The remaining one percent of CD loans helped revitalize and stabilize low- and moderate-income geographies.

### **Product Innovation and Flexibility**

UMB offers flexible loan programs that assist LMI individuals and small farmers. Home mortgage loan programs provide down payment assistance and provide qualified persons with refinancing options at a lower rate. UMB also participates in the Small Business Development Beginning Farmer Loan Program. The impact on the lending test rating is neutral since the bank does not track performance or the responsiveness to the community.

## **INVESTMENT TEST**

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

The bank's performance under the Investment Test for the St. Louis AA is rated "Outstanding." Based on full-scope reviews, the bank's performance in the St. Louis MO-IL AA is excellent.

Refer to Table 14 in the St. Louis MO-IL section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

UMB provided an excellent level of qualified investments in the St. Louis AA. The bank made 491 investments during the evaluation period, which totaled \$15.7 million. Including prior period investments, this total is \$17.8 million and represents 20 percent of total CD investments for the bank. The total investments in the AA represented 22 percent of Tier One Capital allocated to the AA. UMB's responsiveness to CD needs is excellent and helps meet needs for affordable housing and economic development. Current period investments total \$15.7 million and primarily consist of:

- \$9.1 million invested in mortgage loan pools comprised of home loans to LMI borrowers;
- \$3 million invested in equity fund investments for affordable housing projects; and
- \$2.6 million consisting of affordable housing loans originated by the UMB's CDC and funding for a bond issuance for the local school district that primarily serves families living below the national poverty level.
- The remaining \$1 million balance represents donations to various organizations that primarily provide community services to low-and moderate-income individuals and families throughout the AA.

Prior period investments of \$2.1 million continue to support organizations that provide community services and shelter for low-and moderate-income youth.

## **SERVICE TEST**

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

The bank's performance under the service test in the St. Louis MO-IL MA is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the St. Louis MO-IL AA is adequate.

### **Retail Banking Services**

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

UMB's delivery systems are reasonably accessible to essentially all portions of the St. Louis AA. Branch distribution is adequate. The bank has no branches in low-income geographies but does have four branches in moderate-income geographies. The percentage of branches in moderate-income tracts is near to the percentage of population residing in those tracts. Two of the 18 branches in middle- or upper-income tracts are adjacent to low- or moderate-income tracts helping to provide accessibility of banking services to LMI individuals.

During the evaluation period, UMB opened four and closed seven branches. All branch openings were in middle- and upper-income geographies. Branch closings affected four upper-income, one middle income, and two moderate-income census tracts. The branch in Collinsville, IL was in a moderate-income tract and was forced to close by eminent domain for a highway construction project. Another branch in a moderate-income geography in Caseyville, IL closed due to the low volume of activity. A new UMB branch opened approximately two miles from both locations. In addition, there are other financial institutions in the area.

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

Refer to the Description of Institution section of this document for detail regarding UMBs other alternative delivery systems. The impact on the service test rating is neutral since the bank does not maintain information to demonstrate the effectiveness or impact of alternative delivery systems in serving LMI segments of the community.

## **Community Development Services**

UMB provided a relatively high level of community development services in the St. Louis MO-IL and is considered good.

UMB bank staff provided their financial expertise to 92 different organizations that promote community development initiatives in the AA. This involved over 50 bank employees. The majority of the organizations provide community services such as financial educational, legal and healthcare programs for LMI individuals. Other community development services provided by bank staff were to organizations that helped provide affordable housing and promote economic development in LMI geographies. Following are some examples of CD Services provided by employees:

- Archdiocesan of St. Louis – This organization is focused on education initiatives in low- and moderate-income geographies. Employees provide financial education and participate on the finance committee.
- Ferguson Neighborhood Improvement Program – This organization oversees affordable housing loan programs and commercial redevelopment in the city of Ferguson, which is a moderate-income area. Employees provide financial services via membership on the Board of Directors and loan committee.
- Get Checking Program – This program targets unbanked low- and moderate-income individuals. Employees provide financial education and participate on the Advisory Board.
- Habitat for Humanity – This organization provides affordable housing. Employees provide financial education and participate in fundraising activities.

Refer to the Description of Institution section of this document for details on community development services offered by UMB via Electronic Transfer Accounts and Temporary Aid to Needy Families.

## State Rating

### State of Missouri

<b>CRA Rating for Missouri<sup>3</sup>:</b>	<b>Outstanding</b>
<b>The lending test is rated:</b>	<b>Outstanding</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include:

- Lending test performance in the non-MSA is excellent. Lending activity is good and the overall geographic and borrower distribution of loans are excellent. UMB exhibited a good level of CD lending with a positive impact on the lending test.
- Investment test performance in the non-MSA is excellent as demonstrated by the level of qualified investments. Investments are responsive to identified affordable housing needs in the AA.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels in the combined non-MSA MO AA and the limited scope AAs, although with limited branch presence in the limited scope AAs. Bank personnel provided an adequate level of community development services during the evaluation period.

### Description of Institution's Operations in Missouri

UMB operates 26 branches and 38 ATMs within its AAs in the state of Missouri. Small loans to farms are the primary business focus in the non-MSA based on loan opportunities and the number of farms in these geographies. The AA includes approximately 3,000 farms. The non-MSA AA received a full-scope review. The state of Missouri AAs represents 11 percent of the bank's total deposit base and 28 percent of total reported loans (by number) during this evaluation period. In addition, 20 percent of the dollar volume of total reported loans is in the Missouri AAs.

Non-MA in Missouri were combined for analysis purposes and represents the following counties: Johnson, Pettis, Cooper, Henry, Benton, Barry, Lawrence, Marion, Monroe, Ralls, Shelby, Linn, and Sullivan. UMB AAs also consist of the entire Joplin MSA; Buchanan and Andrew counties in the St. Joseph MO-KS MSA; Greene and Christian counties in the Springfield MSA; Boone county in the Columbia MSA; and Callaway and Cole counties in the Jefferson City MSA.

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

The non-MSA MO AA represents 48 percent of total deposits in the state of Missouri and 5 percent of total bank deposits. UMB ranks first in deposit market share in the non-MSA MO AA at 16.04 percent. The AA also has 61 percent of loan originations (by number) in the State of Missouri. UMB operates 14 branches and 18 ATMs in the non-MSA. Competition is strong with 40 institutions, a majority of which are headquartered in the state of Missouri.

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

## **Scope of Evaluation in Missouri**

We evaluated the bank's performance in the State of Missouri by performing a full-scope review in the non-MSA, which were combined for analysis purposes. The area received a full-scope review since it has the most deposits and loans in Missouri. We performed limited-scope reviews in the Joplin, St. Joseph, Springfield, Columbia, and Jefferson City AAs. The state rating is based primarily on results of those areas that received full-scope reviews. Refer to Appendix A for more information.

In the non-MSA, small loans to farms represents 53 percent of the number of total reported loans in the AA. Home mortgage lending represents 27 percent of the total reported loans, with home refinancing accounting for 59 percent, followed by home purchase loans at 31 percent and home improvement loans at 10 percent. Small loans to businesses represented 20 percent of the number of total reported loans in this AA.

To identify community credit needs, we considered one community contact conducted by OCC staff within the last 12 months with an economic development organization. The contact identified business expansion loans and home loans as a community needs. UMB also identified affordable housing and job creation as community needs.

## **LENDING TEST**

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

The bank's performance under the lending test in Missouri is rated "Outstanding". Based on full-scope reviews, the bank's performance in the non-MSA is excellent.

### **Lending Activity**

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

Lending levels are good in relation to area credit needs and the bank's deposit market share. UMB ranks first in deposit market share in the non-MSA MO AA at 16.04 percent.

For small loans to farms, UMB ranks first (by number) and second (by dollar volume) at 22.27 percent and 19.05 percent, respectively.

For home purchase and home improvement loans, UMB ranks 16<sup>th</sup> and 11<sup>th</sup> (by number) at 1.53 percent and 2.49 percent, respectively. UMB ranks 12<sup>th</sup> (by number) for home refinance loans at 2.23 percent. For home refinance and home purchase loans, there are 235 and 194 lenders in the AA, respectively, reflecting strong competition. Bank rankings for both home refinance and home purchase loans are in the top 10 percent of lenders in the market. For home improvement loans, UMB ranks within the top 15 percent in the market. For home refinance, home purchase, and home improvement loans, the top five lenders in the market accounted for 35.67 percent, 40.35 percent, and 40.49 percent, respectively.

For small loans to businesses, UMB ranks 10<sup>th</sup> (by number) at 4.52 percent. UMB ranks in the top 20 percent of lenders in the market. Three of the top four lenders are nationwide credit card companies. The top five lenders in the market have a combined market share of 46.01 percent.

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

The overall geographic distribution of loans is excellent. There are no low-income census tracts in the combined non-MSA.

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

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

The geographic distribution of home mortgage loans is excellent.

The geographic distribution of home purchase loans is excellent. The percentage of loans exceeded demographics in moderate-income tracts. The bank's home purchase loan market share in moderate-income geographies also exceeded the overall market share.

The geographic distribution of home improvement loans is excellent. The percentage of loans in moderate-income geographies was below the demographics. However, the market share in moderate-income census tracts exceeded the overall market share.

The geographic distribution of home refinance loans is excellent. The percentage of loans in moderate-income geographies was below the demographics. However, the market share in moderate-income census tracts exceeded the overall market share.

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

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

The geographic distribution of small loans to businesses is good. The percentage of these loans in moderate-income geographies exceeded the demographics. The market share in moderate-income tracts was below the overall market share.

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

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

The geographic distribution of small loans to farms is excellent. The percentage of these loans in moderate-income geographies exceeded the demographics. In addition, the market share in moderate-income tracts exceeded the overall market share.

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

Our geographic distribution analysis included a review for lending gaps, particularly in low- and moderate-income areas. We did not identify any unexplained gaps in the non-MSA MO AA.

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

We performed an analysis of the inside/outside ratio at the bank level. A majority of UMB's loans were originated within the bank's defined AAs. Refer to Evaluation Scope for additional detail on the bank's performance.

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

The overall borrower distribution of loans is excellent.

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

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

The distribution of home mortgage loans to borrowers of different income levels is excellent.

The borrower distribution of home purchase loans is excellent. The percentage of loans to low-income borrowers was below demographics and considered adequate. The percentage of loans to moderate-income borrowers exceeded the demographics. The

market share of loans to low-income borrowers exceeded the overall home purchase market share. Market share to moderate-income borrowers was below the overall market share for these loans.

The borrower distribution of home improvement loans is excellent. The percentage of loans to low-income borrowers was considered good. The percentage of loans to moderate-income borrowers exceeded the demographics. The market share of loans to both low- and moderate-income borrowers was below the overall market share for these loans.

The borrower distribution of home refinance loans is excellent. The percentage of loans to low-income borrowers was adequate and below demographics. The percentage of loans to moderate-income borrowers was near to the demographics. The market share of loans to both low- and moderate-income borrowers exceeded the overall market share for these loans.

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

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

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

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

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

The distribution of small loans to farms is excellent when considering market share performance. UMB's percentage of loans to farms with revenues of \$1 million or less was near to the demographics. The overall market share of loans to farms with revenues of \$1 million or less exceeded the overall market share.

### **Community Development Lending**

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

UMB's responsiveness under the CD lending test is good given its size, lending capacity and area opportunities. The bank originated 26 CD loans totaling \$74 million during the evaluation period. UMB's CD lending performance had a positive impact on the lending test rating for the non-MSA MO AA.

Approximately 85 percent of the number of loans helped promote economic development through the financing of small businesses and supported permanent job creation, and/or improvement for LMI individuals. Four loans (15 percent) were to a nonprofit organization that provides low-income disabled adults with training and placement in entry level jobs.

### **Product Innovation and Flexibility**

UMB offers flexible loan programs that assist LMI individuals and small farmers. Home mortgage loan programs provide down payment assistance and provide qualified persons with refinancing options at a lower rate. UMB also participates in the Small Business Development Beginning Farmer Loan Program. The impact on the lending test rating is neutral since the bank does not track performance or the responsiveness to the community.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Joplin and St. Joseph MAs is consistent with the bank's overall "Outstanding" performance under the lending test in the state of Missouri. In the Jefferson City, Springfield and Columbia MAs, performance is weaker than the bank's overall performance in the state and is considered good. In the Jefferson City and Springfield MAs, the performance difference was due to weaker geographic and borrower income distribution performance. In the Columbia MA, the performance difference was due to weaker borrower income distribution performance. Performance in limited-scope AAs did not have an impact on the overall lending test rating.

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

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Missouri is rated "Outstanding". Based on full-scope reviews, the bank's performance in the non-MSA MO AA is good. We also gave positive consideration for statewide investments that benefit the AAs within the state, resulting in an overall excellent investment performance within the state of Missouri.

Refer to Table 14 in the state of Missouri section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Based on a full-scope review, the bank's performance in the combined non-MSA Missouri AA is good. The bank made 68 investments totaling \$1.7 million during the evaluation period. When including prior period investments, qualified investments for the AA total \$2 million and represents 21 percent of the bank's CD investments in the state of Missouri. The total investments in the AA represented six percent of Tier One Capital allocated to the AA. The investments are non-complex but UMB's responsiveness is good and helps meet affordable housing and economic development needs in the AA. The current-period investments primarily consist of:

- \$1.1 million invested in two local bond issuances with proceeds used for schools in underserved middle income tracts to construct, and furnish classrooms.
- \$579 thousand invested in mortgage loan pools comprised of home loans to LMI borrowers; and
- \$47 thousand in charitable donations to area organizations that provide targeted services for low- and moderate-income individuals and families.

Prior period investments of \$425 thousand continue to support a school bond issuance to build a new high school that primarily serves students from low- and moderate-income families.

We also gave positive consideration to statewide investments totaling \$4 million originated within the state of Missouri. Statewide investments consist of \$1.9 million originated during the current evaluation period and \$2 million originated during the prior period. The investments (both current and prior period) consist of MHDC (Missouri Housing Development Commission) bonds that have the potential to benefit any AA in the state of Missouri. The Commission administers the federal and Missouri Low Income Housing Tax Credit (LIHTC) programs, the federal HOME funds, the U.S. Department of Housing and Urban Development (HUD) Project Based Section 8 rental assistance contracts, and the Missouri Housing Trust Fund to help prevent homelessness and to provide emergency housing assistance for very low-income Missourians.

The statewide investment total also includes a \$139 thousand current period grant to an organization for its debt management program, which primarily serves LMI individuals. The program provides education on the use of credit and helps clients solve debt problems. This program has the potential to benefit any AA in the state of Missouri.

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

Based on limited-scope reviews, the bank's performance under the investment test in the Joplin, Springfield and Columbia MAs is consistent with the bank's overall "Outstanding" performance under the investment test in the state of Missouri. In the St. Joseph, and Jefferson City MAs the bank's performance is weaker than the overall performance in the state, but is considered adequate. Combined performance in the limited-scope AAs does not impact the overall conclusions.

Refer to the Table 14 in the state of Missouri section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Missouri is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the combined non-MSA MO AA adequate.

### **Retail Banking Services**

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

Delivery systems are reasonably accessible to essentially all portions of the institution's non-MSA MO AA. There are no low-income geographies in this AA. UMB does not have any branches in the four moderate-income tracts in the AA, where four percent of the population reside. However, two of 14 branches in middle- or upper-income tracts are adjacent to moderate-income tracts, which help to provide financial services to low- or moderate-income individuals.

During the evaluation period, UMB closed three branches in the AA. Branch closings did not adversely affect the accessibility of the bank's delivery systems to low- and moderate-income geographies and individuals. Two were in middle-income tracts and one was in an upper-income tract. Branch closings were due to low volumes of business activity. There were no branches opened during this period.

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

Refer to the Description of Institution section of this document for detail regarding UMBs other alternative delivery systems. The impact on the service test rating is neutral since the bank does not maintain information to demonstrate the effectiveness or impact of alternative delivery systems in serving LMI segments of the community.

### **Community Development Services**

UMB provided an adequate level of community development services in the Non-MA MO.

UMB bank staff provided their financial expertise to 32 different organizations that promote community development initiatives in the AA. This involved 27 bank employees. Twenty-four organizations provide financial education, healthcare, shelter,

and other community services targeted to low- and moderate-income individuals. The remaining organizations help provide affordable housing, technical assistance to small businesses and farms, and revitalize/stabilize low- and moderate-income geographies. Following are some examples of CD services provided by employees:

- Brookfield Community Betterment, Inc. – provides technical assistance to help meet the credit needs of small businesses and farms. Employees provide financial services with membership on the Board and by serving as Treasurer.
- Habitat for Humanity – provides affordable housing. Employees provide financial services by serving as Treasurer and assisting with fundraising activities.
- Salvation Army – provides community services targeted to low- and moderate-income individuals. Employees assist with fundraising activities.

Refer to the Description of Institution section of this document for details on community development services offered by UMB via Electronic Transfer Accounts and Temporary Aid to Needy Families.

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

Based on limited-scope reviews, the bank's performance under the service test in the Joplin, St. Joseph, Columbia, and Jefferson City AAs is consistent with the bank's overall "Low Satisfactory" performance under the service test in Missouri. In the Springfield AA the bank's performance is stronger than the bank's overall performance in the state and is considered good. Stronger performance is due to the distribution of branches in the Springfield AA. Performance in limited-scope AAs helps to support the overall Service test rating.

Refer to Table 15 in the state of Missouri section of appendix D for the facts and data that support these conclusions.

## State Rating

### State of Kansas

<b>CRA Rating for Kansas<sup>4</sup>:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	<b>High Satisfactory</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>High Satisfactory</b>

The major factors that support this rating include:

- Lending test performance in the Wichita AA is good. The level of lending activity and overall geographic distribution of loans are good. The overall borrower distribution of loans is poor. CD lending provided a significantly positive impact on the overall lending test rating. The combined performance in the limited scope areas also had a positive impact on the overall state lending test rating.
- Investment test performance is excellent. A substantial majority of the investment dollars supports affordable housing initiatives and services to low- and moderate-income individuals. Affordable housing is an identified community need.
- Delivery systems are accessible to essentially all geographies and individuals of different income levels, although with limited branch presence. Bank personnel provided an adequate level of community development services during the evaluation period.

### Description of Institution's Operations in Kansas

UMB operates 9 branches and 13 ATMs within its AAs in the state of Kansas. Small loans to businesses are the primary lending focus in the Wichita AA which received a full-scope review and includes all of Sedgwick County, Kansas. The state of Kansas AAs represents four percent of the bank's total deposit base and 11 percent of total reported loans (by number) during this evaluation period. In addition, 9 percent of the dollar volume of total reported loans is in the Kansas AAs. UMB AAs also consist of Shawnee County in the Topeka MSA, Douglas County in the Lawrence MSA, and the non-MSA AAs in Kansas, which were combined for analysis purposes. Non-MA AAs include the counties of Atchison and Bourbon.

The Wichita AA represents 24 percent of total deposits in the state of Kansas and one percent of total bank deposits. UMB ranks 13<sup>th</sup> in deposit market share in the Wichita AA at 0.96 percent. The AA also has 28 percent of loan originations (by number) in the State of Kansas. UMB operates three branches and four ATMs in the AA. Competition

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

is provided by 37 institutions, a majority of which is headquartered in the state of Kansas.

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

## **Scope of Evaluation in Kansas**

We evaluated the bank's performance in the State of Kansas by performing a full-scope review in the Wichita assessment area. We performed a full-scope review of the Topeka AA at the last CRA evaluation in 2007, which has the highest volume of deposits in Kansas. The Wichita AA received a full-scope review at this evaluation since it has the second highest volume of deposits and loans in Kansas. We performed limited-scope reviews in the Topeka, Lawrence, and combined non-MSA KS AAs. The state rating is based primarily on results of the area that received a full-scope review. Refer to Appendix A for more information.

In the Wichita AA, small loans to businesses represents 78 percent of the number of total reported loans in the AA. Home mortgage lending represents 22 percent of the total reported loans, which home improvement accounting for 43 percent, followed by home purchase at 29 percent and refinance at 28 percent. An analysis of small farm lending was only performed in the combined non-MSA AA. These loans are not an identified credit need in the other AAs and the bank originated or purchased less than 20 small farm loans in these AAs during the evaluation period.

We conducted one community contact in the Wichita AA with a community rights organization. Our contact identified affordable housing and financial education as a primary community need.

## **LENDING TEST**

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

The bank's performance under the lending test in Kansas is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Wichita AA is good. CD lending performance provided a positive impact on the lending test rating in this AA. Performance in the combined limited scope areas is also good and had a positive impact on the lending test rating in the state.

### **Lending Activity**

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

Lending levels are good in relation to area credit needs and the bank's deposit market share. UMB ranks 13<sup>th</sup> in deposit market share in the Wichita AA at 0.96 percent. For

small loans to businesses, UMB ranks 12<sup>th</sup> (by number) and fifth (by dollar volume) at 1.90 percent and 5.77 percent, respectively.

For home purchase, home improvement, and home refinance loans, market share is 0.07 percent (ranked 87<sup>th</sup>), 0.09 percent (ranked 57<sup>th</sup>), and 0.12 percent (ranked 76<sup>th</sup>), respectively. For home refinance and home purchase loans, there are 205 and 176 lenders in the AA, respectively, reflecting strong competition. Bank rankings for both home refinance and home purchase loans are in the top 50 percent in the market. For home improvement loans, UMB ranks within the top 80 percent of lenders in the market. For home purchase, home improvement, and home refinance loans, the top five lenders in the market accounted for 41.34 percent, 59.01 percent, and 34.08 percent, respectively.

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

The overall geographic distribution of loans is good.

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

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

The geographic distribution of home mortgage loans is poor. However, given the limited volume of home mortgages originated for home purchase, home improvement, and home refinance, the overall poor rating was not given as much weight as the rating assigned to small loans to businesses. When performing our analysis of mortgage loans greater weight was given to performance in moderate-income geographies, as only 1.4 percent of the owner-occupied units in the AA are located in low-income geographies.

The geographic distribution of home purchase loans is poor when considering market share performance. UMB did not originate or purchase any home purchase loans in low-income geographies. The percentage of loans in moderate-income census tracts was significantly below demographics. However, market share in moderate-income geographies exceeded the overall home purchase market share.

The geographic distribution of home improvement loans is poor. UMB did not originate or purchase any home improvement loans in low-income geographies. The percentage of loans in moderate-income tracts was below the demographics. The bank did not achieve a market share in moderate-income geographies.

The geographic distribution of home refinance loans is very poor. UMB did not originate or purchase any home refinance loans in low-income geographies. The percentage of loans in moderate-income tracts was significantly below the demographics. The bank did not achieve a market share in moderate-income geographies.

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

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

The geographic distribution of small loans to businesses is excellent. The percentage of these loans in both low- and moderate-income tracts exceeded the demographics. In addition, the market share in both low- and moderate-income geographies exceeded the overall market share.

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

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

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

We performed an analysis of the inside/outside ratio at the bank level. A majority of UMB's loans were originated within the bank's defined AAs. Refer to Evaluation Scope for additional detail on the bank's performance.

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

The overall borrower distribution of loans is poor.

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

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

The distribution of home mortgage loans to borrowers of different income levels is adequate.

The borrower distribution of home purchase loans is good. The percentage of loans to low-income borrowers was considered good and the percentage of loans to moderate-income borrowers exceeded the demographics. The bank's low-income borrower market share exceeded the overall market share. The moderate-income market share was well below the bank's overall market share for home purchase loans.

The borrower distribution of home improvement loans is adequate. UMB did not originate any of these loans to low-income borrowers. The percentage of loans to moderate-income borrowers exceeded the demographics. The bank did not achieve a market share to moderate-income borrowers.

The borrower distribution of home refinance loans is adequate. UMB did not originate any of these loans to low-income borrowers. The percentage of loans to moderate-income borrowers exceeded the demographics. The bank did not achieve a market share to moderate-income borrowers.

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

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

The distribution of small loans to businesses of different sizes is poor. UMB's percentage of loans to businesses with revenues of \$1 million or less was well below the demographics. The bank's market share of small loans to businesses with revenues of \$1 million or less was below the overall market share.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the state of Kansas section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all 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.

CD had a significantly positive impact on the lending performance in the Wichita AA. UMB's CD lending is excellent given its size, lending capacity and area opportunities. The bank originated 24 CD loans totaling \$121 million during the evaluation period.

Approximately 96 percent of the number of loans and 98 percent of the dollar volume helped promote economic development through the financing of small businesses and supported permanent job creation, and/or improvement for LMI individuals. One loan (four percent) helped revitalize a moderate-income census tract in the AA as part of a community plan approved by the city of Wichita.

We gave consideration to four statewide community development loans totaling \$12 million. These loans do not have the potential to benefit the AA. However, they financed a small business that provided and retained jobs to LMI individuals in Newton, Kansas.

### **Product Innovation and Flexibility**

UMB offers flexible loan programs that assist LMI individuals and small farmers. Home mortgage loan programs provide down payment assistance and provide qualified persons with refinancing options at a lower rate. UMB also participates in the Small Business Development Beginning Farmer Loan Program. The impact on the lending test rating is neutral since the bank does not track performance or the responsiveness to the community.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Topeka AA and combined non-MSA AA is somewhat stronger than the bank's overall "High Satisfactory" performance under the lending test in Kansas. Stronger performance in both AAs was due to stronger geographic and borrower income distribution performance. In both of these AAs, CD lending had a positive impact on the overall lending test conclusion. In the Lawrence AA, the bank's performance is consistent with the bank's "High Satisfactory" performance in the state. Combined performance in the limited-scope areas had a positive impact on the lending test rating for the state.

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

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Kansas is rated "Outstanding". Based on full-scope reviews, the bank's performance in the Wichita AA is excellent.

Refer to Table 14 in the state of Kansas section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Based on a full-scope review, the bank's performance in the Wichita AA is excellent. During the evaluation period, the bank made 38 qualified investments totaling \$784,000. This represents 21 percent of the bank's CD investments in the state of Kansas. The total investments in the AA represented 11 percent of Tier One Capital allocated to the AA. UMB's responsiveness to CD needs help meet affordable housing needs. The investments are non-complex. UMB does not have any prior period investments in the Wichita AA. Current period investments primarily consist of:

- \$706 thousand invested in mortgage loan pools comprised of home loans to LMI borrowers; and
- \$78 thousand in charitable donations to area organizations that provide targeted services for low- and moderate-income individuals and families.

UMB made investments in the Kansas statewide area that have the potential to benefit the AAs in the state. These investments total \$282 thousand. These investments did not impact the overall Investment Test rating.

- Current period investments total \$76 thousand and include a grant to an organization that primarily benefits LMI individuals by helping them manage debt and providing targeted social service programs. This investment is responsive to the identified community need for financial education.

- Prior period investments total \$206 thousand and include two equity investments in the Small Business Investment Company (SBIC) Kansas Venture Capital Fund. The fund provides equity and mezzanine capital primarily to small and middle market Midwestern companies that have the potential for substantial growth and long-term equity appreciation.

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

Based on limited-scope reviews, the bank's performance under the investment test in the Topeka and Lawrence AAs are consistent with the bank's overall "Outstanding" performance under the investment test in Kansas. In the combined non-MSA AA, the bank's performance is weaker than its overall performance in the state. The level of qualified investments and grants is adequate. Performance in limited-scope AAs did not have an impact on the investment test rating.

Refer to the Table 14 in the state of Kansas section of appendix D for the facts and data that support these conclusions.

### **SERVICE TEST**

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

The bank's performance under the service test in Kansas is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Wichita AA is good.

#### **Retail Banking Services**

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

UMB's service delivery systems are accessible to essentially all portions of the Wichita AA. The bank has three branches in the Wichita AA, one of which is located in a moderate-income tract. There are no branches in low-income census tracts, but less than three percent of the population of the AA is located in low-income geographies. UMB has not opened or closed any branches in the AA during the evaluation period.

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

Refer to the Description of Institution section of this document for detail regarding UMBs other alternative delivery systems. The impact on the service test rating is neutral since the bank does not maintain information to demonstrate the effectiveness or impact of alternative delivery systems in serving LMI segments of the community.

## **Community Development Services**

UMB provided an adequate level of community development services in the Wichita AA.

UMB bank staff provided their financial expertise to nine different organizations that promote community development initiatives in the AA. This involved seven bank employees. These initiatives include financial education, healthcare, shelter, and other community services targeted to low- and moderate-income individuals.

Refer to the Description of Institution section of this document for details on community development services offered by UMB via Electronic Transfer Accounts and Temporary Aid to Needy Families.

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

Based on limited-scope reviews, the bank's performance under the service test in the Topeka and combined non-MSA AAs is consistent with the bank's overall "High Satisfactory" performance under the service test in Kansas. In the Lawrence AA, the bank's performance is weaker than the bank's overall performance in the state and is considered adequate. This performance was due to branch distribution. Performance in the limited-scope AAs did not have an impact on the Service test rating.

Refer to Table 15 in the state of Kansas section of appendix D for the facts and data that support these conclusions.

## State Rating

### State of Oklahoma

<b>CRA Rating for Oklahoma<sup>5</sup>:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	<b>High Satisfactory</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include:

- Lending test performance in the Oklahoma City AA is good. Lending activity and the overall geographic distribution of loans are good. The overall borrower distribution of loans is adequate. The level of CD lending had a positive impact on the bank's lending test rating.
- Investment test performance is excellent. A portion of investment dollars support affordable housing and financial education, which are identified community needs.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels, although with limited branch presence. Bank personnel provided an adequate level of community development services during the evaluation period.

### Description of Institution's Operations in Oklahoma

UMB operates five branches and five ATMs within its AAs in the state of Oklahoma. Small loans to businesses are the primary lending focus in the Oklahoma City AA which received a full-scope review and includes all of Oklahoma County. The state of Oklahoma AAs represents two percent of the bank's total deposit base and six percent of total reported loans (by number) during this evaluation period. In addition, five percent of the dollar volume of total reported loans is in the Oklahoma AAs. UMB AAs also consist of Tulsa County in the Tulsa MSA.

The Oklahoma City AA represents 88 percent of total deposits in the state of Oklahoma and two percent of total bank deposits. UMB ranks 20<sup>th</sup> in deposit market share in the Oklahoma City AA at 0.93 percent. The AA also has 70 percent of loan originations (by number) in the State of Oklahoma. Competition is provided by 50 institutions, a majority of which is headquartered in the state of Oklahoma.

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

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

## **Scope of Evaluation in Oklahoma**

We evaluated the bank's performance in the State of Oklahoma by performing a full-scope review in the Oklahoma City assessment area. We performed a limited-scope review in the Tulsa AA. The state rating is based primarily on results of the area that received a full-scope review. Refer to Appendix A for more information.

In the Oklahoma City AA, small loans to businesses represents 83 percent of the number of total reported loans in the AA. Home mortgage lending represents 17 percent of the total reported loans, with home refinancing accounting for 55 percent of total home mortgage lending, followed by purchase at 36 percent and home improvement loans at nine percent. Home improvement lending analysis was not meaningful as there were only 12 such loans during the evaluation period. Small farm lending analysis was not meaningful as this product represented less than one percent of the number of total reported loans in the AA. Small farm lending is not an identified credit need for this AA.

We conducted one community contact in the Oklahoma City AA with a local nonprofit organization that provides various social services. Our contact identified affordable housing and financial education as a primary community need.

## **LENDING TEST**

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

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

### **Lending Activity**

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

Lending levels are good in relation to area credit needs and the bank's deposit market share. UMB ranks 20<sup>th</sup> in deposit market share in the Oklahoma City AA at 0.93 percent and is in the 40<sup>th</sup> percentile. Regarding small loans to businesses, UMB ranks 17<sup>th</sup> (by number) and eighth (by dollar volume) at 1.24 percent and 4.31 percent, respectively.

For home purchase and home refinance loans, market share is 0.11 percent (ranked 74<sup>th</sup>) and 0.12 percent (ranked 90<sup>th</sup>), respectively. For home purchase and home refinance loans, there are 241 and 266 lenders in the AA, respectively, reflecting strong competition. In the market, home purchase and home refinance loans rank in the top 35 percent. For home purchase and home refinance loans, the top five lenders in the market accounted for 42.70 percent and 36.81 percent, respectively.

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

The overall geographic distribution of loans is good.

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

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

The geographic distribution of home mortgage loans is adequate.

The geographic distribution of home purchase loans is good. The percentage of loans in low-income geographies exceeded the demographics. The percentage of loans in moderate-income tracts was well below the demographics. The bank did not achieve a market share in low-income geographies but the moderate-income market share exceeded the overall home purchase market share.

The geographic distribution of home improvement loans was not considered in the rating due to the limited number of originations, 12 mortgages.

The geographic distribution of home refinance loans is adequate. The percentage of loans in low-income geographies exceeded the demographics. The percentage of loans in moderate-income tracts was below the demographics. The bank did not achieve a market share in low-income geographies and the moderate-income market share was well below the overall home refinance market share.

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

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

The geographic distribution of small loans to businesses is excellent. The percentage of these loans in low-income tracts exceeded the demographics. The percentage of these loans in moderate-income tracts substantially met the demographics. The market share in low-income tracts exceeded the overall market share. The market share in moderate-income tracts was near to the overall market share.

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

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

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

We performed an analysis of the inside/outside ratio at the bank level. A majority of UMB's loans were originated within the bank's defined AAs. Refer to Evaluation Scope for additional detail on the bank's performance.

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

The overall borrower distribution of loans is adequate.

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

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

The distribution of home mortgage loans to borrowers of different income levels is poor.

The borrower distribution of home purchase loans is adequate. The percentage of loans to low-income borrowers was well below the demographics but considered adequate. The percentage of loans to moderate-income borrowers was near to the demographics. Both the low- and moderate-income borrower market shares were well below the overall market share.

The borrower distribution of home improvement loans was not considered in the rating due to the limited number of originations, 12 mortgages.

The borrower distribution of home refinance loans is poor. The percentage of loans to low-income borrowers was well below the demographics. The percentage of loans to moderate-income borrowers was below the demographics. The low-income borrower market share exceeded the overall market share, while the moderate-income borrower market share was well below the overall market share.

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

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

The distribution of small loans to businesses of different sizes is adequate when considering market share performance. UMB's percentage of loans to businesses with revenues of \$1 million or less was well below the demographics. The market share of small loans to businesses with revenues of \$1 million or less exceeded the overall market share for these loans.

## **Community Development Lending**

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

CD lending was strong and had a positive impact on the lending performance in the Oklahoma City AA. UMB's CD lending is good given its size, lending capacity and area opportunities. The bank originated 23 CD loans totaling \$12 million during the evaluation period.

All CD loans helped promote economic development through the financing of small businesses and supported permanent job creation, and/or improvement for LMI individuals in Oklahoma City.

## **Product Innovation and Flexibility**

UMB offers flexible loan programs that assist LMI individuals and small farmers. Home mortgage loan programs provide down payment assistance and provide qualified persons with refinancing options at a lower rate. UMB also participates in the Small Business Development Beginning Farmer Loan Program. The impact on the lending test rating is neutral since the bank does not track performance or the responsiveness to the community.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Tulsa AA is consistent with the bank's overall "High Satisfactory" performance under the lending test in Oklahoma.

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

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Oklahoma is rated "Outstanding". Based on full-scope reviews, the bank's performance in the Oklahoma City AA is excellent.

Refer to Table 14 in the state of Oklahoma section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Based on a full-scope review, the bank's performance in the Oklahoma City AA is excellent. During the evaluation period the bank made 19 qualified investments totaling

\$5.8 million. This represents 93 percent of the bank's CD investments in the state of Oklahoma. Total investments in the AA represent 43 percent of Tier One Capital allocated to the AA. UMB's responsiveness to CD needs helps meet affordable housing and community service needs. The investments are non-complex and were all originated during the current evaluation period. Current period investments consist of:

- Local school bond issuances totaling \$4.6 million. These bonds provided classroom equipment and furnishings for a local elementary school where over 70 percent of students are from LMI families; and
- Mortgage loan pools comprised of home loans to LMI borrowers totaling \$1.2 million.

The bank also made a statewide investment totaling \$7 thousand originated within the state. These funds were to an organization that primarily benefits LMI individuals by helping them manage debt and providing targeted social service programs. This investment is responsive to the identified community need for financial education but did not impact the overall state rating.

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

Based on limited-scope reviews, the bank's performance under the investment test in the Tulsa AA is consistent with the bank's overall "Outstanding" performance under the investment test in Oklahoma.

Refer to the Table 14 in the state of Oklahoma section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Oklahoma is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Oklahoma City AA is adequate.

### **Retail Banking Services**

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

UMB's service delivery systems are reasonably accessible to essentially all portions of the Oklahoma City AA, given the bank's relatively limited presence in the AA. The bank has five branches in the Oklahoma City AA. One branch is located in a low-income tract. There are no branches in moderate-income census tracts. Two branches are in tracts with no income level designation, which are located in the Oklahoma City

downtown area. UMB has not opened or closed any branches during the evaluation period.

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

Refer to the Description of Institution section of this document for detail regarding UMBs other alternative delivery systems. The impact on the service test rating is neutral since the bank does not maintain information to demonstrate the effectiveness or impact of alternative delivery systems in serving LMI segments of the community.

### **Community Development Services**

UMB provided an adequate level of community development services in the Wichita AA.

UMB bank staff provided their financial expertise to 10 different organizations that promote community development initiatives in the AA. This involved ten employees. Eight organizations provide community services targeted to LMI individuals such as health, education, and foster care for children. Two organizations promote economic development by funding and providing technical assistance small businesses.

Refer to the Description of Institution section of this document for details on community development services offered by UMB via Electronic Transfer Accounts and Temporary Aid to Needy Families.

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

Based on limited-scope reviews, the bank's performance under the service test in the Tulsa AA is consistent with the bank's overall "Low Satisfactory" performance under the service test in Oklahoma.

Refer to Table 15 in the state of Oklahoma section of appendix D for the facts and data that support these conclusions.

## State Rating

### State of Nebraska

<b>CRA Rating for Omaha<sup>6</sup>:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	<b>Low Satisfactory</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include:

- Lending test performance in the Omaha AA is adequate. Lending activity in the Omaha AA is good. The overall geographic and borrower distribution of loans is adequate. The level of community development lending had a positive impact on the bank’s lending test rating.
- Investment test performance is excellent. A majority of investment dollars support affordable housing, which is an identified community need.
- Delivery systems are reasonably accessible to essentially all geographies and individuals of different income levels, although with limited branch presence. Bank personnel provided an adequate level of community development services during the evaluation period.

### Description of Institution’s Operations in Nebraska

UMB operates three branches and three ATMs within its AA in the state of Nebraska. Small loans to businesses are the primary lending focus in the Omaha AA which received a full-scope review and is the only AA in Nebraska. The Omaha AA includes Douglas County and represents 0.64 percent of the bank’s total deposit base and two percent of total reported loans (by number and dollar) during this evaluation period.

UMB ranks 20<sup>th</sup> in deposit market share in the Omaha AA at 0.32 percent. Competition is provided by 33 institutions, a majority of which are headquartered in the state of Nebraska.

Refer to the market profile for the state of Nebraska in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews. We considered comparatively weak economic conditions in weighting performance in the AA in deriving overall ratings for the bank.

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

## **Scope of Evaluation in Nebraska**

We evaluated the bank's performance in the State of Nebraska by performing a full-scope review in the state's only AA, Omaha. The state rating is based on results of the area that received a full-scope review. Refer to Appendix A for more information. In the Omaha AA, small loans to businesses represent 78 percent of the number of total reported loans in the AA. Home mortgage lending represents 20 percent of total reported loans, with home refinancing accounting for 66 percent of total home mortgage lending, followed by home purchase at 32 percent. Analysis of home improvement lending was not meaningful as the bank originated only two home improvement loans during the evaluation period. Small farm lending analysis also was not meaningful as this product represented less than one percent of the number of total reported loans in the AA.

We conducted one community contact in the Omaha AA with a local nonprofit organization that provides various social services. Our contact identified small dollar loan programs for start-up businesses and affordable housing as a primary credit need.

## **LENDING TEST**

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

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

### **Lending Activity**

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

Lending levels are good in relation to area credit needs and the bank's deposit market share. UMB ranks 20<sup>th</sup> in deposit market share in the Omaha AA at 0.32 percent and are in the 60<sup>th</sup> percentile. Regarding small loans to businesses, UMB ranks 19<sup>th</sup> (by number) and ninth (by dollar volume) at 0.92 percent and 3.28 percent, respectively.

For home purchase and home refinance loans, market share is 0.08 percent and 0.07 percent, respectively. There are 189 home purchase and 226 home refinance lenders in the AA, reflecting strong competition. In the market, home purchase and home refinance loans rank in the top 40 percent and 35 percent, respectively. The top five home purchase lenders in the market accounted for 50.31 percent of loans. The top five home refinance lenders accounted for 43.53 percent of loans in the market.

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

The overall geographic distribution of loans is adequate.

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

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

The geographic distribution of home mortgage loans is poor.

The geographic distribution of home purchase loans is good. The percentage of loans in low-income geographies exceeded the demographics. The percentage of loans in moderate-income tracts was below the demographics. The bank's market share in both low- and moderate-income geographies exceeded the overall home purchase market share.

The geographic distribution of home refinance loans is very poor. UMB did not originate any home refinance loans in low- or moderate-income census tracts.

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

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

The geographic distribution of small loans to businesses is good. The percentage of these loans in low-income tracts was near-to the demographics and considered good. In moderate-income tracts, performance was adequate with the percentage of loans below demographics. The bank's market share in low-income geographies exceeded the overall small loans to businesses market share. The market share in moderate-income geographies was well below the overall market share.

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

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

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

We performed an analysis of the inside/outside ratio at the bank level. A majority of UMB's loans were originated within the bank's defined AAs. Refer to Evaluation Scope for additional detail on the bank's performance.

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

The overall borrower distribution of loans is adequate.

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

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

The distribution of home mortgage loans to borrowers of different income levels is poor.

The borrower distribution of home purchase loans is very poor. UMB did not originate any home purchase loans to low- or moderate-income borrowers.

The borrower distribution of home refinance loans is poor. The percentage of loans to low- and moderate-income borrowers was well below the percentage of low- and moderate-income families. The bank did not achieve a market share to low-income borrowers. The moderate-income borrower market share was well below the overall home refinance market share.

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

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

The distribution of small loans to businesses of different sizes is adequate when considering market share performance. UMB's percentage of loans to businesses with revenues of \$1 million or less was well below the demographics. The small loans to small businesses market share exceeded the overall small loans to businesses market share.

### ***Community Development Lending***

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

CD lending had a positive impact on the lending performance in the Omaha AA. UMB's CD lending is good given its size, lending capacity and area opportunities. The bank originated 12 CD loans totaling \$31 million during the evaluation period.

All CD loans helped promote economic development through the financing of small businesses and supported permanent job creation, and/or improvement for LMI individuals in the Omaha AA.

## **Product Innovation and Flexibility**

UMB offers flexible loan programs that assist LMI individuals and small farmers. Home mortgage loan programs provide down payment assistance and provide qualified persons with refinancing options at a lower rate. UMB also participates in the Small Business Development Beginning Farmer Loan Program. The impact on the lending test rating is neutral since the bank does not track performance or the responsiveness to the community.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Nebraska is rated "Outstanding". Based on full-scope reviews, the bank's performance in the Omaha AA is excellent.

Refer to Table 14 in the state of Nebraska section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Based on a full-scope review, the bank's performance in the Omaha AA is excellent. During the evaluation period the bank made 13 investments totaling \$1.2 million. In total, qualified investments for the AA was \$1.2 million and represented 27 percent of Tier One Capital allocated to the AA. UMB's responsiveness to CD needs helps meet affordable housing needs. The investments are non-complex. Investment totals include one prior period investment totaling \$6 thousand. Current period investments primarily consist of:

- Mortgage loan pools comprised of home loans to LMI borrowers totaling \$1.1 million; and
- Charitable donations totaling \$23 thousand to CD organizations that provide various services, including financial education and emergency shelter, to LMI individuals and families.

The bank made one statewide investment totaling \$5 thousand originated in Nebraska to an organization that has a purpose, mandate or function of serving LMI individuals across the state, including the bank's AAs, by helping them manage debt and providing targeted social service programs to those individuals.

## **SERVICE TEST**

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

The bank's performance under the service test in Nebraska is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Omaha AA is adequate.

## **Retail Banking Services**

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

UMB's service delivery systems are reasonably accessible to essentially portions of the bank's AAs given the bank's limited presence in this market. The bank has three branches in the Omaha AA. One branch is located in a middle-income tract and two are in upper-income tracts. There are no branches in low- or moderate-income census tracts.

Branch openings and closings did not adversely affect the accessibility of the bank's delivery system. During the evaluation period, UMB closed one branch in a middle-income tract and opened one branch in an upper-income tract. The branch closing was due to low activity volumes.

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

Refer to the Description of Institution section of this document for detail regarding UMBs other alternative delivery systems. The impact on the service test rating is neutral since the bank does not maintain information to demonstrate the effectiveness or impact of alternative delivery systems in serving LMI segments of the community.

## **Community Development Services**

UMB provided an adequate level of community development services in the Omaha AA.

Two UMB bank staff provided their financial expertise to nine different organizations that promote community development initiatives in the AA. These organizations provide community services targeted to LMI individuals such as training to promote independent living and financial education for youth.

Refer to the Description of Institution section of this document for details on community development services offered by UMB via Electronic Transfer Accounts and Temporary Aid to Needy Families.

## 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 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): 1/1/2007 to 12/31/2011 Investment and Service Tests and CD Loans: 4/24/2007 to 6/4/2012	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
UMB Bank, N.A. (UMB) Kansas City, Missouri	Home Purchase, Home Improvement, Home Refinance, Small Business, Small Farm, and Community Development Loan Data; Qualified Investments; Retail and Community Development Services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
UMB CDC Kansas City Financial Corporation UMB Charitable Trusts & Foundation	Subsidiary of UMBFC Subsidiary of UMB Common ownership	Qualified Investments Qualified Investments Qualified Investments
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Multistate MAs: Kansas City MA #28140  St. Louis MA #41180  State of Missouri: Combined non-MSA  Joplin MA #27900 St. Joseph MA #41140 Springfield MA #44180 Columbia MA #17860 Jefferson City MA #27620	Full-scope  Full-scope  Full-Scope  Limited-scope Limited-scope Limited-scope Limited-scope Limited-scope	Missouri Counties: Cass, Clay, Jackson, Platte. Kansas Counties: Johnson, Wyandotte  Missouri Counties: St. Louis City, St. Louis, Jefferson. Illinois Counties: St. Charles, St. Clair, Madison  Johnson, Pettis, Cooper, Henry, Benton, Barry, Lawrence, Marion, Monroe, Ralls, Shelby, Linn, and Sullivan Counties  Buchanan and Andrew Counties Greene and Christian Counties Boone County Callaway and Cole Counties

<p>State of Kansas:</p> <p>Wichita MA #48620</p> <p>Topeka MA #45820</p> <p>Lawrence MA #29940</p> <p>Combined non-MSA</p>	<p>Full-scope</p> <p>Limited-scope</p> <p>Limited-scope</p> <p>Limited-scope</p>	<p>Sedgwick County</p> <p>Shawnee County</p> <p>Douglas County</p> <p>Atchison and Bourbon Counties</p>
<p>State of Oklahoma:</p> <p>Oklahoma City MA #36420</p> <p>Tulsa MA #46140</p>	<p>Full-scope</p> <p>Limited-scope</p>	<p>Oklahoma County</p> <p>Tulsa County</p>
<p>State of Nebraska</p> <p>Omaha MA #36540</p>	<p>Full-scope</p>	<p>Douglas County</p>

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

RATINGS UMB Bank, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
UMB Bank, N.A.	Outstanding	Outstanding	Low Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Kansas City MO-KS	Outstanding	Outstanding	Low Satisfactory	Outstanding
St. Louis MO-IL	Outstanding	Outstanding	Low Satisfactory	Outstanding
State of Missouri	Outstanding	Outstanding	Low Satisfactory	Outstanding
State of Kansas	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of Oklahoma	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Nebraska	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory

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

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

### Kansas City, MO-KS MA #28140

Demographic Information for Full Scope Area: Kansas City MO-KS						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	466	9.66	25.32	37.34	25.11	2.58
Population by Geography	1,603,727	5.32	19.93	44.72	30.01	0.02
Owner-Occupied Housing by Geography	426,225	3.32	16.21	46.12	34.34	0.00
Business by Geography	168,622	3.03	13.79	40.74	41.63	0.82
Farms by Geography	4,145	1.01	8.59	50.40	39.76	0.24
Family Distribution by Income Level	423,120	18.08	18.42	23.44	40.06	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	154,419	9.82	30.80	45.49	13.89	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		55,031 72,300 8%	Median Housing Value Unemployment Rate (2000 US Census)	108,254 2.29%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 2000 US Census and 2011 HUD updated MFI

The Kansas City AA consists of six contiguous counties in the Kansas City MA. These counties are Cass, Clay, Jackson, and Platte in Missouri; and Johnson and Wyandotte in Kansas. Low- and moderate-income tracts are predominantly located in Jackson and Wyandotte counties. The delineation of the AA complies with the regulation and does not arbitrarily exclude any low- and moderate-income areas. The Kansas City AA has 466 census tracts, which are designated 10 percent low-income, 25 percent moderate-income, 37 percent middle income, 25 percent upper-income, and 3 percent NA. The NA tracts are in Wyandotte County and consist of vacant farmland and industrial districts.

The economic conditions in the AA are reported stable with some small fluctuations in local businesses. The May 2012 area unemployment rate is 6.9 percent compared to the state average of 7.3 percent and the national rate of 8.2 percent for the same time period. Varied employment industries in Kansas City include telecommunications, manufacturing, health care, financial services, engineering, and agribusiness. Major employers include Ford, H&R Block, AT&T, DST Systems, Hallmark Cards, Cerner, and Sprint Corporation, and government.

Based on community contacts, identified community needs are financial assistance programs and community services for youth from low- and moderate-income families. Based on National Association of Realtors data, median housing values declined during the evaluation period from approximately \$140,000 in 2007 to \$124,000 in 2011. There

are a total of 674,544 housing units in the AA. The percentage of owner-occupied, rental, and vacant housing units is 63.19 percent, 30.59 percent, and 6.22 percent, respectively.

**St. Louis, MO-IL MA #41180**

Demographic Information for Full Scope Area: St Louis MO-IL						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	489	11.25	24.34	40.49	23.11	0.82
Population by Geography	2,361,509	6.27	20.58	45.63	27.52	0.01
Owner-Occupied Housing by Geography	651,763	3.33	17.41	48.72	30.53	0.00
Business by Geography	219,729	4.21	16.19	43.03	36.26	0.30
Farms by Geography	5,213	1.06	9.50	60.27	29.16	0.02
Family Distribution by Income Level	620,572	19.34	17.97	22.17	40.51	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	231,558	11.45	31.07	44.65	12.83	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		53,435 69,500 10%	Median Housing Value Unemployment Rate (2000 US Census)	107,339 2.89%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

The St. Louis AA consists of St. Louis City and five contiguous counties in the St. Louis MA. These counties are Jefferson, St. Charles, and St. Louis in Missouri; and Madison and St. Clair in Illinois. The delineation of the AA complies with the regulation and does not arbitrarily exclude and low- or moderate-income areas. The St. Louis AA has 489 census tracts, which are designated 11 percent low-income, 24 percent moderate income, 41 percent middle income, 23 percent upper-income, and 1 percent NA. The NA tracts are part of the Midtown Enterprise Zone, which includes the downtown area.

Economic conditions in the AA are improved with mixed reports in manufacturing and service sectors. The May 2012 area unemployment is 8.0 percent compared to the state average of 7.3 percent and the national rate of 8.2 percent. Various employment industries include aviation, biotechnology, food and beverage manufacturing, telecommunications, and transportation. Major employers include Anheuser-Busch Company, Scott Air Force Base, Boeing International Defense Systems, SBC Communications, BJC Healthcare, SSM Healthcare, and government.

Based on community contacts, identified community needs are home equity lines of credit, helping the unbanked rebuild credit, small business loans, and foreclosure prevention counseling. Affordable housing is also an identified need. Based on National Association of Realtors data, median housing values declined during the evaluation period from approximately \$135,000 in 2007 to \$110,000 in 2011. There are 994,591 housing units in the AA. The percentage of owner-occupied, rental, and vacant housing units is 65.53 percent, 27.30 percent, and 7.17 percent, respectively.

**State of Missouri**

**Combined non-MSA**

Demographic Information for Full Scope Area: Combined non-MSA MO						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	74	0.00	5.41	77.03	17.57	0.00
Population by Geography	287,720	0.00	4.04	76.22	19.75	0.00
Owner-Occupied Housing by Geography	81,663	0.00	4.27	75.47	20.27	0.00
Business by Geography	28,776	0.00	4.46	75.27	20.27	0.00
Farms by Geography	2,776	0.00	1.04	77.81	21.15	0.00
Family Distribution by Income Level	78,468	17.20	17.67	24.02	41.11	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	27,357	0.00	6.28	79.90	13.82	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		35,821 47,200 14%	Median Housing Value Unemployment Rate (2000 US Census)	68,544 2.45%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

The Combined non-MSA MO AA is comprised of eight counties in Missouri. These counties are Johnson, Pettis, Cooper, Henry, Benton, Barry, Lawrence, Marion, Monroe, Ralls, Shelby, Linn, and Sullivan. These 13 counties comprise four assessment areas: Central MO, Monett, Northeast MO and North Central MO. The delineation of the AA complies with the regulation and does not arbitrarily exclude and low- or moderate-income areas. The Combined non-MSA MO AA has 74 census tracts, which are designated as five percent moderate-income, 77 percent middle income, and 18 percent upper-income.

The local economies of these combined areas have been mixed but are showing improvement in employment and at the local economy levels. The averaged May 2012 unemployment rate for the AA is 6.6 percent with the state unemployment rate at 7.3 percent and the national rate of 8.2 percent. Employment in these areas is in agriculture, light manufacturing, service and professional industries, education, health care, and government. Significant employers in the area include Wal-Mart, Jack Henry and Associates, General Mills Central Missouri State University, Whiteman AFB, Norfolk Southern, Tracker Marine, and Walsworth Publishing.

Based on community contacts, community needs include business expansion loans and home loans. Affordable housing and job creation are also identified community needs. There are a total of 130,965 housing units in the AA. The percentage of owner-

occupied, rental, and vacant housing units is 62.35 percent, 23.36 percent, and 14.29 percent, respectively.

**State of Kansas**

**Wichita MA #48620**

Demographic Information for Full Scope Area: Wichita KS						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	118	4.24	33.05	37.29	25.42	0.00
Population by Geography	452,869	2.65	29.09	42.15	26.11	0.00
Owner-Occupied Housing by Geography	116,738	1.40	22.67	46.10	29.83	0.00
Business by Geography	45,569	1.98	24.75	41.13	32.14	0.00
Farms by Geography	1,258	0.95	11.76	51.75	35.53	0.00
Family Distribution by Income Level	118,663	17.98	18.92	24.26	38.84	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	43,797	4.50	43.39	41.12	10.98	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		51,478 64,100 9%	Median Housing Value Unemployment Rate (2000 US Census)		79,321 2.46%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

The Wichita AA is comprised of Sedgwick County in the Wichita, KS MSA. The delineation of the AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas. The Wichita AA has 118 census tracts, which are designated 4 percent low-income, 33 percent moderate-income, 37 percent middle-income, and 26 percent upper-income.

Overall, the local economy is stable, but has experienced some job loss due to Boeing’s decision to close by the end of 2013, which affects approximately two thousand workers and their families. Wichita serves as a regional service and trade center. The local economy is in part tied to the aviation industry, which has been a centerpiece of its economy for many decades. Other major industries include health care, agriculture, manufacturing, camping and outdoor equipment, and government. The May 2012 unemployment rate in Wichita is 7 percent, while the Kansas unemployment rate is 6.2 percent and the national unemployment rate is 8.2 percent. Major employers in Wichita include Cargill and Koch industries, Bombardier Learjet, Spirit Aero systems, Coleman, Dean & DeLuca, and Via Christi.

Based on community contacts, affordable housing and financial education are the primary community needs. Based on National Association of Realtors data, median housing values declined slightly during the evaluation period from approximately \$110,000 in 2007 to \$105,000 in 2011. The percentage of owner-occupied, rental, and vacant housing units is 61.08 percent, 31.24 percent, and 7.68 percent, respectively.

**State of Oklahoma**

**Oklahoma City MA #36420**

Demographic Information for Full Scope Area: Oklahoma City OK						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	227	8.81	36.56	30.40	22.47	1.76
Population by Geography	660,448	4.62	35.85	31.89	27.55	0.09
Owner-Occupied Housing by Geography	161,158	2.81	28.33	34.78	34.08	0.00
Business by Geography	84,029	4.43	24.77	30.74	37.53	2.53
Farms by Geography	1,694	1.89	17.59	33.71	45.69	1.12
Family Distribution by Income Level	171,849	22.30	18.43	20.85	38.42	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	69,988	7.43	48.26	30.68	13.64	0.00
Median Family Income		44,898	Median Housing Value		77,700	
HUD Adjusted Median Family Income for 2011		60,600	Unemployment Rate (2000 US Census)		2.53%	
Households Below Poverty Level		14%				

(\* ) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 2000 US Census and 2011 HUD updated MFI

The Oklahoma City AA is comprised of Oklahoma County in the Oklahoma City, OK MSA. Oklahoma City, the state capital, is located in the central part of the state. The delineation of the AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas. The Oklahoma City AA has 227 census tracts, which are designated 9 percent low-income, 37 percent moderate-income, 30 percent middle-income, 23 percent upper-income, and 2 percent NA. The NA tracts consist of the downtown area and Oklahoma University college facilities.

Economic conditions in Oklahoma County have varied significantly during the rating period with Oklahoma City posting unemployment rates ranging from 2.9 percent in April 2008 to 6.3 percent in January 2010. The state unemployment rate has also more than doubled during the period with a low of 3.4 percent in April 2008 to a high of 7.1 percent in January 2010. As of May 2012 Oklahoma City’s unemployment rate has improved to 4.5 percent, with the state unemployment rate at 4.8 percent compared to the national unemployment rate of 8.2 percent. There is significant employment in the aviation, energy, healthcare, government, and biotechnology industries. Major employers are the state government, Tinker Air Force Base, University of Oklahoma, Integris Health, Chesapeake Energy Corporation, and FAA Mike Monroney Aeronautical Center.

Based on community contacts, financial education and affordable housing loans are the primary community needs.

Based on National Association of Realtors data, median housing values increased slightly during the evaluation period from approximately \$132,000 in 2007 to \$140,000 in 2011. There are a total of 295,020 housing units in the AA. The percentage of owner-occupied, rental, and vacant housing units is 54.63 percent, 35.82 percent, and 9.55 percent, respectively.

**State of Nebraska**

**Omaha MA #36540**

Demographic Information for Full Scope Area: Omaha NE						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	146	4.79	29.45	40.41	25.34	0.00
Population by Geography	463,585	3.26	28.88	41.62	26.24	0.00
Owner-Occupied Housing by Geography	115,199	1.66	22.44	44.60	31.31	0.00
Business by Geography	49,179	2.35	19.40	43.01	35.24	0.00
Farms by Geography	1,160	0.86	12.16	50.09	36.90	0.00
Family Distribution by Income Level	116,039	18.56	18.71	22.86	39.87	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	43,250	5.26	43.67	40.26	10.82	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		53,955 70,600 9%	Median Housing Value Unemployment Rate (2000 US Census)		104,985 2.12%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

The Omaha AA is comprised of Douglas County, which is part of the Omaha-Council Bluffs, NE-IA MSA. The delineation of the AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas. The Omaha AA has 146 census tracts, which are designated 5 percent low-income, 30 percent moderate-income, 40 percent middle income, and 25 percent upper-income.

The local economy is slow. Omaha serves as a regional service and trade center. Local industries include communications, health care, data processing, transportation, education, and government. The May 2012 unemployment rate for the Omaha MSA is 4.2 percent, while the state unemployment rate is 3.9 percent compared with the national unemployment rate of 8.2 percent. Major employers in the area include Offutt Air Force base, Omaha Public Schools, Alegent Health, Methodist Health, First Data, First National of Nebraska, and Union Pacific.

Based on community contacts, small dollar loan programs for start-up businesses is a primary community need. Based on National Association of Realtors data, median housing values declined slightly during the evaluation period from approximately \$134,000 in 2007 to \$131,000 in 2011. There are a total of 192,672 housing units in the AA. The percentage of owner-occupied, rental, and vacant housing units is 59.79 percent, 34.77 percent, and 5.44 percent, respectively.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially 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. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business.

Market share information is presented based on the most recent aggregate market data available.

**Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments.

**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.

## Tables of Performance Data

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**Kansas City, MO-KS**  
**St. Louis, MO-IL**  
**State of Missouri**  
**State of Kansas**  
**State of Oklahoma**  
**State of Nebraska**

**Table 1. Lending Volume**

LENDING VOLUME Geography: Kansas City and St. Louis Multistate MAs <b>Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011</b>												
Assessment Area (2011):	% 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>												
Kansas City MO-KS (FS)	100.00	3,266	415,905	4,587	899,892	48	6,661	205	690,688	8,106	2,013,146	100.00
St Louis MO-IL (FS)	100.00	1,555	115,225	1,650	270,736	8	570	132	483,639	3,345	870,170	100.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 24, 2007 to June 04, 2012.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME Geography: Kansas City and St. Louis Multistate MAs <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011														
Assessment Area (2011):	% 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>														
Kansas City MO-KS (FS)	100.00	19	2,853	19	2,853	0	0	0	0	0	0	0	0	100.00
St Louis MO-IL	100.00	8	1,534	8	1,534	0	0	0	0	0	0	0	0	100.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2007 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. 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: Kansas City and St. Louis Multistate MAs <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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 ****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City MO-KS	765	42.59	3.32	1.70	16.21	11.11	46.12	45.10	34.34	42.09	0.66	0.69	0.90	0.70	0.60
St Louis MO-IL	170	9.47	3.33	0.00	17.41	19.41	48.72	47.06	30.53	33.53	0.11	0.00	0.22	0.08	0.11

\* Based on 2011 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)

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

Geographic Distribution: HOME IMPROVEMENT Geography: Kansas City and St. Louis Multistate MAs Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units**	% BANK Loans****	% Owner Occ Units**	% BANK Loans****	% Owner Occ Units**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City MO-KS	920	39.48	3.32	0.65	16.21	11.63	46.12	51.96	34.34	35.76	1.52	0.00	3.62	1.37	1.35
St Louis MO-IL	925	39.70	3.33	2.81	17.41	15.24	48.72	50.59	30.53	31.35	0.17	0.00	0.00	0.24	0.13

\* Based on 2011 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)

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

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: Kansas City and St. Louis Multistate MAs <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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
<b>Full Review:</b>															
Kansas City MO-KS	1,570	43.84	3.32	1.34	16.21	8.60	46.12	39.87	34.34	50.19	0.82	1.98	1.25	0.96	0.69
St Louis MO-IL	456	12.73	3.33	0.00	17.41	12.94	48.72	42.11	30.53	44.96	0.13	0.00	0.22	0.14	0.11

\* Based on 2011 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 Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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

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

Geographic Distribution: MULTIFAMILY Geography: Kansas City and St. Louis Multistate MAs <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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>															
Kansas City MO-KS	10	20.83	7.07	20.00	27.85	30.00	45.94	50.00	19.14	0.00	0.00	0.00	0.00	0.00	0.00
St Louis MO-IL	4	8.33	10.91	0.00	20.43	50.00	47.22	50.00	21.44	0.00	0.81	0.00	2.70	0.00	0.00

\* Based on 2011 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 Multi Family 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.

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

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: Kansas City and St. Louis Multistate MAs <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total **	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City MO-KS (FS)	4,427	42.73	3.03	5.62	13.79	22.43	40.74	38.94	41.63	33.00	3.86	8.64	6.18	3.91	2.84
St Louis MO-IL (FS)	1,639	15.82	4.21	6.10	16.19	21.35	43.03	43.26	36.26	29.29	1.20	3.25	1.94	1.19	0.86

\* Based on 2010 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 (2011).

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

Geographic Distribution: SMALL LOANS TO FARMS Geography: Kansas City and St. Louis Multistate MAs <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City MO-KS (FS)	47	1.74	1.01	0.00	8.59	0.00	50.40	51.06	39.76	48.94	3.49	0.00	0.00	2.75	5.97
St Louis MO-IL (FS)	8	0.30	1.06	0.00	9.50	25.00	60.27	25.00	29.16	50.00	0.64	0.00	7.14	0.00	1.49

\* Based on 2010 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 (2011).

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

Borrower Distribution: HOME PURCHASE Geography: Kansas City and St. Louis Multistate MAs <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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**	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City MO-KS	765	42.59	18.08	14.42	18.42	25.88	23.44	22.51	40.06	37.20	0.81	0.76	0.73	0.89	0.84
St Louis MO-IL	170	9.47	19.34	17.75	17.97	29.59	22.17	21.89	40.51	30.77	0.13	0.19	0.11	0.11	0.14

\* Based on 2011 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 4.9% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT Geography: Kansas City and St. Louis Multistate MAs <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City MO-KS	920	39.48	18.08	11.84	18.42	19.96	23.44	34.21	40.06	33.99	1.60	1.31	1.74	1.64	1.58
St Louis MO-IL	925	39.70	19.34	11.17	17.97	20.72	22.17	32.10	40.51	36.01	0.18	0.00	0.24	0.38	0.10

\* Based on 2011 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 0.7% of loans originated and purchased by bank.

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

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: Kansas City and St. Louis Multistate MAs <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011																
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families* **	% BANK Loans****	% Families** *	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Overa ll	Low	Mod	Mid
<b>Full Review:</b>																
Kansas City MO-KS	1,571	43.83	18.08	9.81	18.42	19.15	23.44	23.52	40.06	47.51	1.04	1.59	1.12	1.06	0.92	
St Louis MO-IL	456	12.72	19.34	12.02	17.97	20.86	22.17	27.66	40.51	39.46	0.16	0.29	0.17	0.19	0.13	

\* Based on 2011 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 6.1% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: Kansas City and St. Louis Multistate MAs <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011									
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>									
Kansas City MO-KS (FS)	4,587	43.37	65.74	32.72	58.34	16.31	25.35	3.86	4.13
St Louis MO-IL (FS)	1,650	15.60	65.10	33.52	61.70	15.94	22.36	1.20	1.08

\* Based on 2010 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 - 2011).

\*\*\*\* 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 19.78% 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: Kansas City and St. Louis Multistate MAs <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011									
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>									
Kansas City MO-KS (FS)	47	1.74	96.65	85.11	57.45	27.66	14.89	3.49	3.90
St Louis MO-IL (FS)	8	0.30	97.30	75.00	75.00	25.00	0.00	0.64	0.45

\* Based on 2010 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 - 2011).

\*\*\*\* 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 2.56% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS Geography: Kansas City and St. Louis Multistate MAs <b>Evaluation Period:</b> APRIL 4, 2007 TO JUNE 4, 2012									
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>									
Kansas City MO-KSA (FS)	2	15,615	314	34,883	316	50,498	100.00	0	0
St Louis MO_KS (FS)	5	2,124	491	15,677	496	17,801	100.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Kansas City and St. Louis Multistate MAs <b>Evaluation Period:</b> APRIL 4, 2007 TO JUNE 4, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Kansas City MO-KS (FS)	100.00	38	100.00	2.63	15.79	60.53	21.05	5	6	0	+1	-3	+1	5.32	19.93	44.72	30.01
St Louis MO-IL (FS)	100.00	22	100.00	0.00	18.18	36.36	45.46	4	7	0	-2	+1	-2	6.27	20.58	45.63	27.52

**Table 1. Lending Volume**

LENDING VOLUME Geography: Missouri <b>Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011</b>												
Assessment Area (2011):	% 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>												
Combined non-MSA MO (FS)	60.66	979	98,538	729	74,226	1,932	111,218	26	73,617	3,666	357,599	47.74
<b>Limited Review:</b>												
Joplin MO (LS)	11.30	274	32,300	257	32,922	140	6,254	12	36,091	683	107,567	13.50
St Joseph MO (LS)	9.75	312	31,540	220	25,939	45	1,804	12	54,600	589	113,883	13.75
Springfield MO (LS)	8.75	235	28,141	260	38,129	8	275	26	154,122	529	220,667	10.26
Columbia MO (LS)	5.20	126	13,639	179	20,000	7	776	2	270	314	34,685	4.84
Jefferson City MO (LS)	4.34	92	11,995	160	23,495	6	410	4	11,500	262	47,400	9.91

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 24, 2007 to June 04, 2012.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME Geography: Missouri Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011														
Assessment Area (2011):	% 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>														
Combined non-MSA MO	20.00	1	241	1	241	0	0	0	0	0	0	0	0	47.74
<b>Limited Review:</b>														
Joplin MO	0.00	0	0	0	0	0	0	0	0	0	0	0	0	13.50
St Joseph MO	0.00	0	0	0	0	0	0	0	0	0	0	0	0	13.75
Springfield MO	20.00	1	25	1	25	0	0	0	0	0	0	0	0	10.26
Columbia MO	60.00	3	645	3	645	0	0	0	0	0	0	0	0	4.84
Jefferson City MO	0.00	0	0	0	0	0	0	0	0	0	0	0	0	9.91

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2007 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. 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: Missouri Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011															
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
<b>Full Review:</b>															
Combined non-MSA MO	299	16.65	0.00	0.00	4.27	7.02	75.47	75.92	20.27	17.06	1.53	0.00	2.47	1.82	0.78
<b>Limited Review:</b>															
Joplin MO	95	5.29	0.00	0.00	8.10	8.42	84.22	86.32	7.68	5.26	0.65	0.00	1.23	0.59	0.81
St Joseph MO	90	5.01	0.00	0.00	9.14	11.11	58.32	57.78	32.55	31.11	1.43	0.00	4.44	1.36	1.20
Springfield MO	44	2.45	0.04	0.00	14.64	13.64	51.15	36.36	34.17	50.00	0.24	0.00	0.00	0.22	0.33
Columbia MO	40	2.23	1.83	0.00	10.60	20.00	59.18	42.50	28.39	37.50	0.23	0.00	0.42	0.13	0.43
Jefferson City MO	21	1.17	0.71	0.00	8.52	4.76	72.97	80.95	17.80	14.29	0.20	0.00	0.00	0.09	0.70

\* Based on 2011 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)

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

Geographic Distribution: HOME IMPROVEMENT Geography: Missouri <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units**	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Combined non-MSA MO	100	4.29	0.00	0.00	4.27	3.00	75.47	76.00	20.27	21.00	2.49	0.00	5.88	2.96	0.00
<b>Limited Review:</b>															
Joplin MO	23	0.99	0.00	0.00	8.10	13.04	84.22	78.26	7.68	8.70	2.29	0.00	0.00	2.87	0.00
St Joseph MO	48	2.06	0.00	0.00	9.14	4.17	58.32	66.67	32.55	29.17	2.55	0.00	0.00	3.75	1.69
Springfield MO	82	3.52	0.04	0.00	14.64	13.41	51.15	40.24	34.17	46.34	0.34	0.00	0.00	0.63	0.00
Columbia MO	43	1.85	1.83	2.33	10.60	2.33	59.18	67.44	28.39	27.91	0.00	0.00	0.00	0.00	0.00
Jefferson City MO	16	0.69	0.71	6.25	8.52	12.50	72.97	81.25	17.80	0.00	0.27	0.00	4.00	0.00	0.00

\* Based on 2011 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)

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

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: Missouri <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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
<b>Full Review:</b>															
Combined non-MSA MO	573	16.00	0.00	0.00	4.27	3.32	75.47	75.04	20.27	21.64	2.23	0.00	3.76	2.50	1.52
<b>Limited Review:</b>															
Joplin MO	154	4.30	0.00	0.00	8.10	7.79	84.22	83.77	7.68	8.44	0.73	0.00	1.16	0.70	0.93
St Joseph MO	166	4.64	0.00	0.00	9.14	5.42	58.32	52.41	32.55	42.17	1.78	0.00	1.37	1.58	2.04
Springfield MO	109	3.04	0.04	0.00	14.64	3.67	51.15	39.45	34.17	56.88	0.32	0.00	0.35	0.18	0.46
Columbia MO	41	1.14	1.83	7.32	10.60	17.07	59.18	41.46	28.39	34.15	0.19	0.00	0.38	0.09	0.34
Jefferson City MO	54	1.51	0.71	0.00	8.52	3.70	72.97	72.22	17.80	24.07	0.32	0.00	0.00	0.40	0.16

\* Based on 2011 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 Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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

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

Geographic Distribution: MULTIFAMILY Geography: Missouri <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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>															
Combined non-MSA MO	7	14.58	0.00	0.00	2.05	0.00	77.87	100.00	20.08	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Joplin MO	2	4.17	0.00	0.00	33.32	0.00	59.26	100.00	7.41	0.00	0.00	0.00	0.00	0.00	0.00
St Joseph MO	8	16.67	0.00	0.00	28.41	37.50	31.01	62.50	40.59	0.00	13.33	0.00	0.00	40.00	0.00
Springfield MO	0	0.00	8.16	0.00	20.57	0.00	52.14	0.00	19.14	0.00	0.00	0.00	0.00	0.00	0.00
Columbia MO	2	4.17	26.68	0.00	30.14	50.00	16.38	50.00	26.79	0.00	2.94	0.00	0.00	8.33	0.00
Jefferson City MO	1	2.08	14.84	0.00	33.78	0.00	36.35	100.00	15.02	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 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 Multi Family 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.

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

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: Missouri Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011																
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total **	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Combined non-MSA MO	729	7.04	0.00	0.00	4.46	5.90	75.27	78.05	20.27	16.05	4.52	0.00	3.13	5.48	2.83	
<b>Limited Review:</b>																
Joplin MO	257	2.48	0.00	0.00	12.44	19.46	79.55	71.21	8.00	9.34	3.81	0.00	4.21	4.07	2.24	
St Joseph MO	220	2.12	0.00	0.00	13.45	18.18	45.45	34.55	41.10	47.27	1.94	0.00	1.25	2.12	2.12	
Springfield MO	260	2.51	2.53	1.92	13.38	29.23	48.88	40.00	35.22	28.85	1.50	0.79	3.17	1.17	1.38	
Columbia MO	179	1.73	14.80	13.97	14.55	13.97	46.90	34.64	23.75	37.43	1.36	0.92	2.92	1.18	1.24	
Jefferson City MO	160	1.54	10.78	15.63	12.44	5.00	62.30	71.25	14.45	8.13	1.87	5.13	0.38	2.16	0.68	

\* Based on 2010 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 (2011).

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

Geographic Distribution: SMALL LOANS TO FARMS Geography: Missouri <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Combined non-MSA MO	1,932	71.64	0.00	0.00	1.04	5.75	77.81	71.12	21.15	23.14	22.27	0.00	82.14	22.46	19.32
<b>Limited Review:</b>															
Joplin MO	139	5.15	0.00	0.00	3.22	0.00	93.41	99.28	3.37	0.72	11.32	0.00	0.00	11.65	0.00
St Joseph MO	45	1.67	0.00	0.00	1.88	0.00	62.32	68.89	35.79	31.11	5.08	0.00	0.00	4.41	6.38
Springfield MO	8	0.30	0.16	0.00	6.66	0.00	60.95	37.50	32.24	62.50	0.57	0.00	0.00	0.76	0.00
Columbia MO	7	0.26	1.52	0.00	7.59	0.00	77.93	85.71	12.97	14.29	0.00	0.00	0.00	0.00	0.00
Jefferson City MO	6	0.22	1.27	0.00	7.99	0.00	74.77	66.67	15.97	33.33	1.39	0.00	0.00	1.64	0.00

\* Based on 2010 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 (2011).

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

Borrower Distribution: HOME PURCHASE Geography: Missouri <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Combined non-MSA MO	299	16.65	17.20	7.80	17.67	18.09	24.02	23.76	41.11	50.35	1.84	2.09	1.10	1.85	2.16
<b>Limited Review:</b>															
Joplin MO	95	5.29	17.53	5.75	19.46	14.94	24.59	20.69	38.41	58.62	0.58	1.00	0.00	0.34	1.00
St Joseph MO	90	5.01	18.15	19.10	18.03	23.60	23.78	26.97	40.04	30.34	1.69	3.06	2.20	0.93	1.32
Springfield MO	44	2.45	16.31	6.98	18.77	18.60	23.73	18.60	41.20	55.81	0.32	0.16	0.16	0.39	0.45
Columbia MO	40	2.23	19.11	8.82	17.92	20.59	22.87	23.53	40.10	47.06	0.22	0.00	0.34	0.36	0.12
Jefferson City MO	21	1.17	16.91	4.76	17.63	42.86	26.23	19.05	39.22	33.33	0.23	0.00	0.60	0.29	0.00

\* Based on 2011 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 4.9% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT Geography: Missouri <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Combined non-MSA MO	100	4.29	17.20	12.24	17.67	20.41	24.02	18.37	41.11	48.98	2.65	2.08	1.96	2.80	3.06
<b>Limited Review:</b>															
Joplin MO	23	0.99	17.53	27.27	19.46	9.09	24.59	31.82	38.41	31.82	2.56	6.67	2.86	0.00	2.82
St Joseph MO	48	2.06	18.15	8.51	18.03	31.91	23.78	23.40	40.04	36.17	2.86	7.14	9.68	0.00	0.00
Springfield MO	82	3.52	16.31	9.76	18.77	18.29	23.73	32.93	41.20	39.02	0.37	0.00	0.00	1.16	0.00
Columbia MO	43	1.85	19.11	11.63	17.92	16.28	22.87	23.26	40.10	48.84	0.00	0.00	0.00	0.00	0.00
Jefferson City MO	16	0.69	16.91	12.50	17.63	31.25	26.23	25.00	39.22	31.25	0.29	0.00	0.00	0.00	0.72

\* Based on 2011 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 0.7% of loans originated and purchased by bank.

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

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: Missouri <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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****	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Combined non-MSA MO	573	15.99	17.20	6.10	17.67	16.38	24.02	23.62	41.11	53.90	2.93	4.76	3.35	3.32	2.49
<b>Limited Review:</b>															
Joplin MO	154	4.30	17.53	4.17	19.46	13.89	24.59	27.08	38.41	54.86	0.95	0.00	0.89	1.12	1.00
St Joseph MO	166	4.63	18.15	9.82	18.03	27.61	23.78	26.38	40.04	36.20	2.30	4.17	3.93	2.56	1.32
Springfield MO	109	3.04	16.31	4.72	18.77	14.15	23.73	16.98	41.20	64.15	0.43	0.61	0.08	0.30	0.57
Columbia MO	41	1.14	19.11	5.88	17.92	32.35	22.87	17.65	40.10	44.12	0.22	0.00	0.36	0.13	0.25
Jefferson City MO	54	1.51	16.91	13.73	17.63	19.61	26.23	31.37	39.22	35.29	0.35	0.52	0.00	0.49	0.38

\* Based on 2011 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 6.1% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: Missouri <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011									
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>									
Combined non-MSA MO	729	6.89	69.65	60.08	78.46	11.39	10.15	4.52	4.84
<b>Limited Review:</b>									
Joplin MO	257	2.43	68.31	45.14	71.98	10.12	17.90	3.81	3.01
St Joseph MO	220	2.08	67.17	47.27	67.73	22.27	10.00	1.94	2.48
Springfield MO	260	2.46	67.17	34.62	63.85	17.31	18.85	1.50	1.31
Columbia MO	179	1.69	65.83	49.72	73.18	13.97	12.85	1.36	1.49
Jefferson City MO	160	1.51	65.67	48.75	63.13	15.63	21.25	1.87	1.46

\* Based on 2010 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 - 2011).

\*\*\*\* 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 19.78% 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: Missouri <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011									
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>									
Combined non-MSA MO	1,932	71.64	99.32	95.91	85.51	10.51	3.99	22.27	24.11
<b>Limited Review:</b>									
Joplin MO	139	5.15	99.27	95.68	87.77	10.79	1.44	11.32	12.37
St Joseph MO	45	1.67	98.90	97.78	88.89	11.11	0.00	5.08	7.23
Springfield MO	8	0.30	98.88	100.00	87.50	12.50	0.00	0.57	0.71
Columbia MO	7	0.26	98.62	100.00	28.57	71.43	0.00	0.00	0.00
Jefferson City MO	6	0.22	98.55	100.00	66.67	33.33	0.00	1.39	1.77

\* Based on 2010 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 - 2011).

\*\*\*\* 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 2.56% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS Geography: Missouri <b>Evaluation Period:</b> APRIL 24, 2007 TO JUNE 4, 2012									
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>									
Combined NonMA AAs	1	425	68	1,726	69	2,151	20.50%	0	0
<b>Limited Review:</b>									
Joplin MA	4	1,749	52	330	56	2,079	19.82%	0	0
St Joseph	1	6	31	406	32	412	3.93%	0	0
Springfield MA	1	172	30	903	31	1,075	10.25%	0	0
Columbia MA	1	5	21	505	22	510	4.86%	0	0
Jefferson City MA	0	0	16	266	16	266	2.53%	0	0
Statewide with potential to benefit AAs	6	2,050	6	1,949	12	3,999	38.11%	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Missouri <b>Evaluation Period:</b> APRIL 24, 2007 TO JUNE 4, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Combined non-MSA MO	47.74	14	53.85	0.00	0.00	92.86	7.14	0	3	0	0	-2	-1	0.00	4.04	76.22	19.75
<b>Limited Review:</b>																	
Joplin MO	13.50	4	15.37	0.00	0.00	100.0	0.00	0	1	0	0	-1	0	0.00	11.30	81.76	6.94
St Joseph MO	13.75	3	11.54	0.00	0.00	66.67	33.33	1	2	0	-2	+1	0	0.00	12.94	54.09	32.97
Springfield MO	10.26	3	11.54	0.00	33.33	66.67	0.00	1	2	0	0	0	-1	2.05	19.28	49.57	29.10
Columbia MO	4.84	1	3.85	0.00	0.00	0.00	100.0	0	2	-1	-1	0	0	7.49	17.95	50.57	23.99
Jefferson City MO	9.91	1	3.85	0.00	0.00	100.0	0.00	0	0	0	0	0	0	3.57	10.40	69.08	15.26

**Table 1. Lending Volume**

LENDING VOLUME Geography: Kansas Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011												
Assessment Area (2011):	% 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>												
Wichita KS	28.41	146	12,893	519	100,774	3	1,385	24	121,120	692	236,172	24.25
<b>Limited Review:</b>												
Topeka KS	12.31	114	11,333	174	21,610	6	141	6	7,200	300	40,284	50.12
Lawrence KS	8.79	56	6,858	153	23,548	0	0	5	8,000	214	38,406	4.94
Combined non-MSA KS	50.49	361	26,349	378	22,249	490	27,975	1	5,000	1,230	81,573	20.69
Statewide with no potential benefit to AAs	0.00	0	0	0	0	0	0	4	12,250	4	12,250	0.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 24, 2007 to June 04, 2012.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME Geography: Kansas Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011														
Assessment Area (2011):	% 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>														
Wichita KS	0.00	0	0	0	0	0	0	0	0	0	0	0	0	24.25
<b>Limited Review:</b>														
Topeka KS	0.00	0	0	0	0	0	0	0	0	0	0	0	0	50.12
Lawrence KS	0.00	0	0	0	0	0	0	0	0	0	0	0	0	4.94
Combined non-MSA KS	100.00	2	120	2	120	0	0	0	0	0	0	0	0	20.69

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.  
 \*\* The evaluation period for Optional Product Line(s) is from January 01, 2007 to December 31, 2011.  
 \*\*\* Deposit Data as of June 30, 2011. 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: Kansas <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Wichita KS	43	2.39	1.40	0.00	22.67	9.30	46.10	37.21	29.83	53.49	0.07	0.00	0.21	0.03	0.07
<b>Limited Review:</b>															
Topeka KS	35	1.95	0.65	0.00	21.77	22.86	41.36	45.71	36.23	31.43	0.32	0.00	0.39	0.31	0.31
Lawrence KS	9	0.50	0.11	0.00	19.97	44.44	49.84	44.44	30.08	11.11	0.15	0.00	0.42	0.19	0.00
Combined non-MSA KS	100	5.57	0.00	0.00	8.74	15.00	91.26	85.00	0.00	0.00	5.21	0.00	16.67	4.02	0.00

\* Based on 2011 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)

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

Geographic Distribution: HOME IMPROVEMENT Geography: Kansas <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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****	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Wichita KS	62	2.66	1.40	0.00	22.67	16.13	46.10	54.84	29.83	29.03	0.09	0.00	0.00	0.00	0.26
<b>Limited Review:</b>															
Topeka KS	16	0.69	0.65	0.00	21.77	43.75	41.36	31.25	36.23	25.00	0.00	0.00	0.00	0.00	0.00
Lawrence KS	16	0.69	0.11	0.00	19.97	6.25	49.84	68.75	30.08	25.00	0.00	0.00	0.00	0.00	0.00
Combined non-MSA KS	65	2.79	0.00	0.00	8.74	15.38	91.26	84.62	0.00	0.00	26.09	0.00	0.00	27.27	0.00

\* Based on 2011 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)

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

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: Kansas <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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
<b>Full Review:</b>															
Wichita KS	41	1.14	1.40	0.00	22.67	9.76	46.10	26.83	29.83	63.41	0.12	0.00	0.00	0.08	0.19
<b>Limited Review:</b>															
Topeka KS	62	1.73	0.65	0.00	21.77	11.29	41.36	38.71	36.23	50.00	0.41	0.00	0.28	0.26	0.55
Lawrence KS	31	0.87	0.11	0.00	19.97	16.13	49.84	54.84	30.08	29.03	0.12	0.00	0.00	0.17	0.10
Combined non-MSA KS	190	5.31	0.00	0.00	8.74	22.63	91.26	77.37	0.00	0.00	6.98	0.00	18.18	6.21	0.00

\* Based on 2011 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 Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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

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

Geographic Distribution: MULTIFAMILY Geography: Kansas Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011															
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>															
Wichita KS	0	0.00	4.30	0.00	32.79	0.00	42.30	0.00	20.62	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Topeka KS	1	2.08	5.50	0.00	22.25	100.00	52.47	0.00	19.77	0.00	4.76	0.00	20.00	0.00	0.00
Lawrence KS	0	0.00	10.24	0.00	34.66	0.00	37.90	0.00	17.20	0.00	0.00	0.00	0.00	0.00	0.00
Combined non-MSA KS	6	12.50	0.00	0.00	20.47	0.00	79.53	100.00	0.00	0.00	50.00	0.00	0.00	50.00	0.00

\* Based on 2011 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 Multi Family 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.

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

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: Kansas <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011																
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total **	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Wichita KS	519	5.01	1.98	5.01	24.75	34.10	41.13	38.15	32.14	22.74	1.90	2.78	2.32	1.75	1.73	
<b>Limited Review:</b>																
Topeka KS	174	1.68	11.01	11.49	16.69	25.86	38.93	37.36	33.36	25.29	2.06	5.17	2.30	1.83	1.37	
Lawrence KS	153	1.48	2.14	0.00	24.42	24.84	43.29	39.22	30.15	35.95	2.84	33.33	2.50	2.56	3.18	
Combined non-MSA KS	378	3.65	0.00	0.00	11.60	20.63	88.40	79.37	0.00	0.00	24.75	0.00	51.85	21.34	0.00	

\* Based on 2010 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 (2011).

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

Geographic Distribution: SMALL LOANS TO FARMS Geography: Kansas Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Wichita KS	2	0.07	0.95	0.00	11.76	50.00	51.75	0.00	35.53	50.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Topeka KS	6	0.22	2.68	0.00	7.04	16.67	49.92	0.00	40.37	83.33	4.76	0.00	0.00	0.00	11.11
Lawrence KS	0	0.00	0.28	0.00	13.93	0.00	52.65	0.00	33.15	0.00	0.00	0.00	0.00	0.00	0.00
Combined non-MSA KS	490	18.17	0.00	0.00	2.45	2.86	97.55	97.14	0.00	0.00	80.81	0.00	50.00	81.44	0.00

\* Based on 2010 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 (2011).

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

Borrower Distribution: HOME PURCHASE Geography: Kansas <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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***	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Wichita KS	43	2.39	17.98	10.53	18.92	31.58	24.26	21.05	38.84	36.84	0.09	0.12	0.06	0.14	0.05
<b>Limited Review:</b>															
Topeka KS	35	1.95	13.32	14.29	15.07	37.14	21.62	22.86	49.99	25.71	0.40	0.00	0.64	0.47	0.32
Lawrence KS	9	0.50	18.17	12.50	18.89	12.50	24.70	37.50	38.24	37.50	0.09	0.00	0.00	0.00	0.20
Combined non-MSA KS	100	5.57	18.83	16.84	21.30	20.00	26.95	30.53	32.93	32.63	6.13	7.14	1.64	11.11	6.98

\* Based on 2011 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 4.9% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT Geography: Kansas Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families* **	% BANK Loans****	% Families***	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Wichita KS	62	2.66	17.98	0.00	18.92	20.97	24.26	29.03	38.84	50.00	0.10	0.00	0.00	0.00	0.24
<b>Limited Review:</b>															
Topeka KS	16	0.69	13.32	18.75	15.07	31.25	21.62	18.75	49.99	31.25	0.00	0.00	0.00	0.00	0.00
Lawrence KS	16	0.69	18.17	6.25	18.89	25.00	24.70	43.75	38.24	25.00	0.00	0.00	0.00	0.00	0.00
Combined non-MSA KS	65	2.79	18.83	10.94	21.30	18.75	26.95	31.25	32.93	39.06	30.00	100.00	0.00	40.00	33.33

\* Based on 2011 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 0.7% of loans originated and purchased by bank.

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

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: Kansas <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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****	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Wichita KS	41	1.14	17.98	0.00	18.92	20.00	24.26	12.50	38.84	67.50	0.16	0.00	0.00	0.00	0.34
<b>Limited Review:</b>															
Topeka KS	62	1.73	13.32	4.92	15.07	34.43	21.62	26.23	49.99	34.43	0.49	0.51	0.96	0.46	0.31
Lawrence KS	31	0.86	18.17	7.69	18.89	7.69	24.70	34.62	38.24	50.00	0.15	0.73	0.00	0.00	0.19
Combined non-MSA KS	190	5.30	18.83	14.45	21.30	19.65	26.95	28.32	32.93	37.57	8.79	3.85	15.15	9.41	7.75

\* Based on 2011 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 6.1% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: Kansas Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011									
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>									
Wichita KS	519	4.91	66.16	23.70	57.23	18.88	23.89	1.90	1.51
<b>Limited Review:</b>									
Topeka KS	174	1.65	64.92	43.10	70.11	16.09	13.79	2.06	2.07
Lawrence KS	153	1.45	68.75	43.79	72.55	8.50	18.95	2.84	2.20
Combined non-MSA KS	378	3.57	71.49	48.68	88.10	6.08	5.82	24.75	36.49

\* Based on 2010 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 - 2011).

\*\*\*\* 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 19.78% 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: Kansas <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011									
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>									
Wichita KS	2	0.07	97.77	100.00	50.00	0.00	50.00	0.00	0.00
<b>Limited Review:</b>									
Topeka KS	6	0.22	98.66	83.33	100.00	0.00	0.00	4.76	9.09
Lawrence KS	0	0.00	98.33	0.00	0.00	0.00	0.00	0.00	0.00
Combined non-MSA KS	490	18.17	99.39	95.31	83.06	14.08	2.86	80.81	87.91

\* Based on 2010 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 - 2011).

\*\*\*\* 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 2.56% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS Geography: Kansas <b>Evaluation Period:</b> APRIL 24, 2007 TO JUNE 4, 2012									
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>									
Wichita MA	0	0	38	784	38	784	20.62%	0	0
<b>Limited Review:</b>									
Topeka MA	0	0	23	2,090	23	2,090	54.97%	0	0
Lawrence MA	0	0	5	415	5	415	10.92%	0	0
Combined NonMA AAs	1	4	16	227	17	231	6.07%	0	0
Statewide with potential to benefit AAs	2	206	4	76	6	282	7.42%	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Kansas <b>Evaluation Period:</b> APRIL 24, 2007 TO JUNE 4, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Wichita KS	24.25	3	42.87	0.00	33.34	33.33	33.33	0	0	0	0	0	0	2.65	29.09	42.15	26.11
<b>Limited Review:</b>																	
Topeka KS	50.12	3	14.28	0.00	33.34	33.33	33.33	0	1	0	-1	0	0	1.72	26.54	40.50	31.24
Lawrence KS	4.94	1	14.28	0.00	0.00	0.00	100.0	0	0	0	0	0	0	5.95	25.54	46.20	22.31
Combined non-MSA KS	20.69	2	28.57	00.0	50.0	50.00	0.00	1	0	0	0	+1	0	0.00	9.57	90.43	0.00

**Table 1. Lending Volume**

LENDING VOLUME Geography: Oklahoma <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011												
Assessment Area (2011):	% 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>												
Oklahoma City OK	69.58	140	24,762	680	125,557	1	481	23	11,750	844	162,550	88.29
<b>Limited Review:</b>												
Tulsa OK	30.42	25	5,233	333	32,359	1	1	10	28,000	369	65,593	11.71

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 24, 2007 to June 04, 2012.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME Geography: Oklahoma <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011														
Assessment Area (2011):	% 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>														
Oklahoma City OK	83.33	5	437	5	437	0	0	0	0	0	0	0	0	88.29
<b>Limited Review:</b>														
Tulsa OK	16.67	1	800	1	800	0	0	0	0	0	0	0	0	11.71

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.  
 \*\* The evaluation period for Optional Product Line(s) is from January 01, 2007 to December 31, 2011.  
 \*\*\* Deposit Data as of June 30, 2011. 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: Oklahoma <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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****	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Oklahoma City OK	49	2.73	2.81	4.08	28.33	16.33	34.78	30.61	34.08	48.98	0.11	0.00	0.17	0.03	0.14
<b>Limited Review:</b>															
Tulsa OK	13	0.72	1.49	0.00	19.28	15.38	39.59	30.77	39.63	53.85	0.03	0.00	0.00	0.03	0.04

\* Based on 2011 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)

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

Geographic Distribution: HOME IMPROVEMENT Geography: Oklahoma <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Oklahoma City OK	12	0.52	2.81	8.33	28.33	50.00	34.78	8.33	34.08	33.33	0.10	0.00	0.00	0.14	0.14
<b>Limited Review:</b>															
Tulsa OK	0	0.00	1.49	0.00	19.28	0.00	39.59	0.00	39.63	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 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)

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

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: Oklahoma <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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	Up p
<b>Full Review:</b>															
Oklahoma City OK	75	2.09	2.81	4.00	28.33	18.67	34.78	22.67	34.08	54.67	0.12	0.00	0.07	0.06	0.15
<b>Limited Review:</b>															
Tulsa OK	11	0.31	1.49	18.18	19.28	27.27	39.59	18.18	39.63	36.36	0.02	0.00	0.15	0.00	0.02

\* Based on 2011 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 Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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

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

Geographic Distribution: MULTIFAMILY Geography: Oklahoma <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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***	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Oklahoma City OK	2	4.17	4.97	0.00	43.58	0.00	30.03	100.00	21.42	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Tulsa OK	1	2.08	3.71	0.00	25.03	0.00	39.55	0.00	31.71	100.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 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 Multi Family 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.

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

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: Oklahoma <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011																
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total **	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Oklahoma City OK	635	6.13	4.43	24.41	24.77	24.72	30.74	29.29	37.53	21.57	1.24	5.56	1.15	1.18	0.61	
<b>Limited Review:</b>																
Tulsa OK	333	3.21	1.21	2.40	19.24	27.93	34.05	31.53	45.49	38.14	0.60	0.00	0.80	0.60	0.56	

\* Based on 2010 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 (2011).

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

Geographic Distribution: SMALL LOANS TO FARMS Geography: Oklahoma <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Oklahoma City OK	1	0.04	1.89	0.00	17.59	100.00	33.71	0.00	45.69	0.00	0.78	0.00	11.11	0.00	0.00
<b>Limited Review:</b>															
Tulsa OK	1	0.04	0.94	0.00	14.30	0.00	39.59	100.00	45.17	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2010 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 (2011).

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

Borrower Distribution: HOME PURCHASE Geography: Oklahoma <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Oklahoma City OK	49	2.73	22.30	11.63	18.43	16.28	20.85	23.26	38.42	48.84	0.13	0.08	0.08	0.13	0.16
<b>Limited Review:</b>															
Tulsa OK	13	0.72	18.98	16.67	17.50	0.00	20.90	16.67	42.62	66.67	0.04	0.13	0.00	0.00	0.06

\* Based on 2011 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 4.9% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT Geography: Oklahoma <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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****	Overa II	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Oklahoma City OK	12	0.52	22.30	0.00	18.43	9.09	20.85	36.36	38.42	54.55	0.05	0.00	0.00	0.00	0.15
<b>Limited Review:</b>															
Tulsa OK	0	0.00	18.98	0.00	17.50	0.00	20.90	0.00	42.62	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 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 0.7% of loans originated and purchased by bank.

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

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: Oklahoma <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Oklahoma City OK	77	2.15	22.30	2.94	18.43	11.76	20.85	20.59	38.42	64.71	0.13	0.16	0.07	0.05	0.18
<b>Limited Review:</b>															
Tulsa OK	11	0.31	18.98	0.00	17.50	14.29	20.90	57.14	42.62	28.57	0.01	0.00	0.00	0.00	0.02

\* Based on 2011 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 6.1% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: Oklahoma <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011									
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>									
Oklahoma City OK	680	6.43	62.47	37.79	56.47	19.85	23.68	1.24	1.33
<b>Limited Review:</b>									
Tulsa OK	333	3.15	57.42	34.53	78.98	8.71	12.31	0.60	0.38

\* Based on 2010 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 - 2011).

\*\*\*\* 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 19.78% 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: Oklahoma <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011									
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>									
Oklahoma City OK	1	0.04	96.16	0.00	0.00	0.00	100.00	0.78	0.00
<b>Limited Review:</b>									
Tulsa OK	1	0.04	95.99	0.00	100.00	0.00	0.00	0.00	0.00

\* Based on 2010 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 - 2011).

\*\*\*\* 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 2.56% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS Geography: Oklahoma <b>Evaluation Period:</b> APRIL 24, 2007 TO JUNE 4, 2012									
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>									
Oklahoma City MA	0	0	19	5,841	19	5,841	92.52%	0	0
<b>Limited Review:</b>									
Tulsa MA (LS)	0	0	6	465	6	465	7.37%	0	0
Statewide with potential to benefit	0	0	1	7	1	7	0.11%	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Oklahoma <b>Evaluation Period:</b> APRIL 24, 2007 TO JUNE 4, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Oklahoma City OK	88.29	*5	83.33	20.00	0.00	40.00	0.00	0	0	0	0	0	0	4.62	35.85	31.89	27.55
<b>Limited Review:</b>																	
Tulsa OK	11.71	1	16.67	0.00	0.00	0.00	100.0	0	0	0	0	0	0	2.72	24.16	38.71	34.41

\* Two branches do not have income designations

**Table 1. Lending Volume**

LENDING VOLUME Geography: Nebraska Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011												
Assessment Area (2011):	% 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>												
Omaha NE	100.00	77	10,910	297	43,954	5	750	12	31,470	391	87.084	100.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 24, 2007 to June 04, 2012.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME geography: Nebraska <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011														
Assessment Area (2011):	% 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>														
Omaha NE	100.00	3	585	3	585	0	0	0	0	0	0	0	0	100.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2007 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. 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: Nebraska Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011															
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****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Omaha NE	23	1.28	1.66	4.35	22.44	17.39	44.60	39.13	31.31	39.13	0.08	1.85	0.11	0.09	0.03

\* Based on 2011 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)

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

Geographic Distribution: HOME IMPROVEMENT Geography: Nebraska <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Omaha NE	2	0.09	1.66	0.00	22.44	0.00	44.60	0.00	31.31	100.00	0.10	0.00	0.00	0.00	0.26

\* Based on 2011 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)

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

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: Nebraska <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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****	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Omaha NE	48	1.34	1.66	0.00	22.44	0.00	44.60	25.00	31.31	75.00	0.07	0.00	0.00	0.04	0.12

\* Based on 2011 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 Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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

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

Geographic Distribution: MULTIFAMILY Geography: Nebraska <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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****	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Omaha NE	4	8.33	2.37	0.00	33.00	50.00	50.40	50.00	14.23	0.00	3.06	0.00	1.67	6.25	0.00

\* Based on 2011 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 Multi Family 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.

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

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: Nebraska <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total **	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Omaha NE	297	2.87	2.35	2.02	19.40	13.13	43.01	49.83	35.24	35.02	0.92	3.25	0.50	1.00	0.93

\* Based on 2010 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 (2011).

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

Geographic Distribution: SMALL LOANS TO FARMS Geography: Nebraska Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Omaha NE	5	0.19	0.86	0.00	12.16	0.00	50.09	20.00	36.90	80.00	1.19	0.00	0.00	0.00	4.00

\* Based on 2010 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 (2011).

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

Borrower Distribution: HOME PURCHASE Geography: Nebraska <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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* ***	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Omaha NE	23	1.28	18.56	0.00	18.71	0.00	22.86	10.00	39.87	90.00	0.05	0.00	0.00	0.00	0.13

\* Based on 2011 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 4.9% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT Geography: Nebraska <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans** **	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Omaha NE	2	0.09	18.56	0.00	18.71	0.00	22.86	0.00	39.87	100.00	0.10	0.00	0.00	0.00	0.26

\* Based on 2011 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 0.7% of loans originated and purchased by bank.

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

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: Nebraska <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011															
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**	Over all	Low	Mod	Mid	Up p
<b>Full Review:</b>															
Omaha NE	48	1.34	18.56	5.00	18.71	7.50	22.86	17.50	39.87	70.00	0.09	0.00	0.05	0.04	0.14

\* Based on 2011 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 6.1% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: Nebraska Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011									
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>									
Omaha NE	297	2.81	66.08	38.05	62.63	19.53	17.85	0.92	0.97

\* Based on 2010 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 - 2011).

\*\*\*\* 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 19.78% 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: Nebraska <b>Evaluation Period:</b> JANUARY 1, 2007 TO DECEMBER 31, 2011									
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>									
Omaha NE	5	0.19	97.33	80.00	40.00	60.00	0.00	1.19	1.79

\* Based on 2010 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 - 2011).

\*\*\*\* 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 2.56% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS Geography: Nebraska <b>Evaluation Period:</b> APRIL 24, 2007 TO JUNE 4, 2012									
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>									
Omaha MA	1	6	13	1,159	14	1,165	99.57%	0	0
Nebraska Statewide	0	0	1	5	1	5	0.43%	0	0

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

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

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS Geography: Nationwide <b>Evaluation Period:</b> APRIL 4, 2007 TO JUNE 4, 2012									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Nationwide with no potential benefit	0	0	1	78	1	78	100.00%	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Nebraska <b>Evaluation Period:</b> APRIL 24, 2007 TO JUNE 4, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Omaha NE	100.00	3	100.00	0.00	0.00	33.33	66.67	1	1	0	0	-1	+1	3.26	28.88	41.62	26.24