



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

**August 18, 2003**

# **Community Reinvestment Act Performance Evaluation**

**UMB Bank, Warsaw, National Association  
Charter Number: 24273**

**201 Main Street  
Warsaw, MO 65355**

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

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## Overall CRA Rating

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

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

Performance Levels	UMB Bank, Warsaw, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- Lending volumes reflect an adequate level of responsiveness in meeting community credit needs. UMB Warsaw has established a strong niche in the market as a consumer lender. Consumer loans represented 74 percent of the loans originations by number and 42 percent originated by dollar volume.
- The overall distribution of loans by income level is excellent. The distribution of small loans to businesses and consumers is excellent. The distribution of small loans to farms is good.
- The level of qualified investments demonstrates adequate responsiveness given the opportunities in the Assessment Area (AA).
- The bank’s delivery systems are accessible to geographies and individuals of different income levels throughout the AA. Bank officers provide their financial expertise through participation in community development services benefiting the AA.

## Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also

include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

**Geography:** A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Description of Institution

UMB Bank, Warsaw, National Association (UMBW) is a \$92 million intrastate financial institution located in Warsaw, Missouri. UMBW converted from a state charter to a national charter in January 2002. The bank is a wholly owned subsidiary of UMB Financial Corporation (UMBFC), Kansas City, Missouri, a \$7 billion regional, multi-bank holding company. UMBFC owns and operates four other national banks, one credit card bank, and one trust company, with 156 locations throughout Missouri, Kansas, Illinois, Oklahoma, Nebraska, and Colorado. Additionally UMBFC owns the UMB Community Development Corporation (UMB CDC). The UMB CDC was designed to provide low-cost mortgages to developers for the purpose of rehabilitation of distressed properties and to low- and moderate-income persons for the purpose of home improvement of owner-occupied housing.

UMBW is a full-service banking institution offering a wide range of products for individuals and businesses. The bank operates four offices in the cities of Clinton, Tightwad, and Warsaw. Two of the four banking locations are full-service. Bank officers routinely set-up appointments at the other two locations and are flexible to accommodate customers after hours if needed. Consumer loans are the bank's primary loan product by both dollar volume and number of loans originated. The bank has established a strong niche in automobile lending in its market.

The following financial information is reported as of June 30, 2003: The loan portfolio totaled \$27.6 million and is comprised of 40 percent loans to individuals, 30 percent commercial and commercial real estate loans, 18 percent residential real estate loans, and 12 percent agriculture loans. Net loans represent 44 percent of total deposits and 30 percent of total assets. Tier 1 capital is \$5.6 million.

UMBW has the financial capacity to assist in meeting the credit needs of its AA. There are no known legal or financial constraints that could impede its CRA efforts. The bank received a "Satisfactory" rating from the Federal Deposit Insurance Corporation on its last CRA evaluation dated October 28, 1997.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for the lending test is January 1, 2002 through December 31, 2002. Products reviewed in the lending test include small business, small farm, and consumer loans. We used 2001 peer lending data, the most recent data available for small business and small farms, to compare UMBW's lending performance to other reporting lenders in the AA. Since the collection of consumer loan data is optional, there is no information available to compare this product with other lender's performance. Our review did not include an evaluation of home mortgage or multifamily lending as the volume of these products is not significant to the bank's performance. The bank, however, voluntarily collects home mortgage information, which is presented in the Tables in Appendix C for informational purposes only.

The evaluation period for the investment and service tests is January 1, 1998 to August 18, 2003. At the bank's request, we considered qualified investments made by its affiliates.

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

### Data Integrity

To assess the accuracy of the data, we conducted an independent test of data of small business, small farm, and consumer loan products. We found the bank's data to be substantially accurate and we used it without exception in this evaluation.

We reviewed 100 percent of the bank's community development investments and services. Only those activities that qualified are presented and considered in this evaluation.

### Selection of Areas for Full-Scope Review and Ratings

UMBW has one AA comprised of Benton and Henry Counties. The bank's rating is based on its performance in its AA. Refer to Appendix A for a complete description of the bank's AA.

### Other

We conducted two community contacts during this evaluation with representatives of local economic development organizations. The contacts identified small business lending, affordable housing, and home improvement loans as primary credit needs in this AA.

## **Fair Lending Review**

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

## Conclusions with Respect to Performance Tests

### LENDING TEST

The bank's performance under the lending test is rated "High Satisfactory."

Our analysis gave the most weight to consumer loans followed by small farm and small business loans. Consumer loans represent 74 percent of the loan originations by number and 42 percent by dollar volume. Small farm and small business loans represent 64 and 36 percent of the dollar amount of reported loans, respectively.

### Lending Activity

Refer to Table 1 Lending Volume and Table 1a Other Products in Appendix C for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect an adequate responsiveness in relation to area credit needs and the bank's deposit market share. During this evaluation period, the bank originated 456 loans totaling \$7.8 million. UMBW ranks second among 13 financial institutions with 12 percent of the deposit market share as of June 30, 2002. The number one ranked institution has a market share of 26 percent, more than twice that of UMBW.

Consumer lending represents the largest volume of loans originated during the evaluation period. UMBW has established a strong niche in the market as a consumer lender. Based on a review of the June 30, 2003 Call Report for this bank and four similarly size local competitors, UMBW has the largest volume of consumer loans by dollar amount outstanding. The bank's primary consumer product is automobile loans. Automobile loans represented 78 percent of the bank's consumer portfolio by number and 71 percent by dollar. Because of the small dollar size of these types of loans compared to real estate and commercial loans, the bank's loan-to-deposit ratio is a limited indicator of the bank's lending activity.

Based on the 2001 Small Business Peer Data, UMBW ranked first in market share for small business loans with 72 percent of the market. For small farm loans, the bank ranked second with approximately 16 percent of the market. Market share data has only limited use in the analysis of the bank's performance, as only four of the 13 financial institutions in the AA are subject to data collection and reporting requirements. Market share data however, is presented for informational purposes in this evaluation.

Small business, home improvement, and affordable housing loans were identified by community contacts, as primary credit needs. We did not evaluate the bank's home mortgage lending activity due to the low volume of loans originated during this evaluation period. However, community contacts and contextual research confirmed local competitors meet housing related credit needs.

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

The geographic distribution of loans is good. The geographic distribution did not carry substantial weight in the Lending Test analysis because the bank's AA primarily consists of middle-income tracts.

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

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is good. The percentage of loans in moderate-income tracts exceeds the demographics. Further, only 2 percent of all businesses in the AA are located in the moderate-income tracts. UMBW originated 3 of its 43 small loans to businesses to borrowers in moderate-income tracts. The bank's market share in moderate-income tracts exceeds its overall market share for small business loans.

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

Refer to Table 7 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans farms is excellent. The percentage of loans in moderate-income tracts significantly exceeds the demographics. Less than 2 percent of all farms in the AA are located in moderate-income tracts. UMBW originated 14 of its 59 small loans to farms to borrowers in the moderate-income tracts. The bank's market share in moderate-income tracts exceeds its overall market share for small farm loans.

### ***Consumer Loans***

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

The geographic distribution of consumer loans is adequate. Although the percentage of loans in the moderate-income tracts is below demographics, given the household poverty rate of 22 percent, performance is adequate. UMBW originated 20 of 337 consumer loans in the moderate-income tracts.

## **Lending Gap Analysis**

Our geographic distribution analysis included a review for any unexplained lending gaps in the AA, particularly in the moderate-income tracts. We performed this analysis using maps and reports showing the bank's lending activity in each tract. Our analysis found UMBW achieved penetration in all moderate-income tracts. We did not identify any conspicuous gaps or underserved geographies within the AA.

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

For the geographic distribution analysis, we performed an inside/outside ratio analysis. A majority of the bank's loans, 66 percent by number, originated to borrowers within the bank's AA. By product type, 91 percent of small business loans, 80 percent of small farm loans, and 62 percent of consumer loans originated to borrowers in the bank's AA. We viewed the bank's inside/outside ratio as a neutral characteristic in our assessment of lending performance.

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

The overall distribution of loans by income level is excellent. The distribution of loans to businesses and consumers is excellent and to farms is good.

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

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

UMBW's distribution of loans to businesses of different sizes is excellent. The percentage of loans to businesses with revenues of \$1 million or less exceeds area demographics. Approximately 91 percent of the bank's small loans to businesses originated in amounts of \$100 thousand or less with an average loan size of \$32 thousand. UMBW ranked first in market share in lending to businesses with revenues of less than \$1 million.

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

Refer to Table 12 in the Appendix C for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

UMBW's distribution of loans to farms of different sizes is good. The percentage of loans to farms with revenues of \$1 million or less is slightly lower than area demographics. The bank originated 85 percent of its loans in amounts of \$100 thousand or less with an average loan size of \$42 thousand. UMBW ranked first in market share in lending to farms with revenues of less than \$1 million.

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

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

The distribution of consumer loans by borrower income level is excellent. The percentage of loans to moderate-income borrowers exceeds demographics and to low-income borrowers is slightly less than demographics. However, performance to low-income borrowers is excellent given the household poverty rate of 19 percent in the AA.

## Community Development Lending

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

Opportunities for community development lending in the bank's AA are limited. Further, UMBW's legal lending limit somewhat restricts its ability to originate community development loans. Community development loans originated by the bank during the evaluation period are reportable small business loans and considered under the Lending Test. The bank originated six loans with a community development purpose totaling \$894 thousand. The purpose of these loans include attracting and financing new businesses to the area that resulted in permanent job creation for low- and moderate-income wage earners and financing non-profit organizations that provide service for low- and moderate-income individual.

## Product Innovation and Flexibility

UMBW offers several programs that use flexible or innovative underwriting to assist low- and moderate-income individuals or geographies. Products include federal and state subsidized first time homebuyer and low down payment assistance programs. We were unable to evaluate the success of these products because the bank does not track the volume of loans originated under these programs.

## INVESTMENT TEST

The bank's performance under the investment test is rated "Low Satisfactory." Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

UMBW's level of qualified investments demonstrates adequate responsiveness given the opportunities in the AA. Community contacts and contextual research shows there are limited opportunities for qualified investments in the bank's AA. Many of the opportunities to participate in qualified investment activities are in the form of grants and donations to organizations within the AA.

Qualified investment made during the evaluation period total \$62 thousand; prior period investments total \$29 thousand. Investment activity is comprised of the following:

- UMB Community Development Corporation (CDC), a subsidiary of UMBFC, with total assets of \$1.6 million that is allocated among each affiliate bank primarily based on the percentage of deposits held at each bank. The allocated portion to UMBW is \$25 thousand. The CDC was reactivated in April 2000 with the intent of providing low-cost home improvement loans to low- and moderate-income borrowers. There was no CDC activity in the AA during the evaluation period.

- \$20 thousand in charitable contributions to organizations that provide social services to low- and moderate-income individuals; \$1,200 of in-kind contributions of office equipment to a provider of basic medical care to low- and moderate-income women and children; and \$1 thousand investment in the Benton County CDC.
- \$15 thousand in contributions to an organization that is focused on downtown revitalization activities that help stabilize moderate-income tracts by providing necessary services to residents.
- \$29 thousand industrial revenue bond to construct an emergency shelter care facility for abused and neglected children. The facility also provides juvenile detention services for courts and state social service divisions. This is a prior period investment.

## **SERVICE TEST**

The bank performance under the service test is rated “High Satisfactory.” Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank’s branch delivery system and branch openings and closings.

### **Retail Banking Services**

UMBW’s delivery systems are accessible to geographies and individuals of different income levels throughout the AA. There are no low- and three moderate-income tracts in the bank’s AA. UMBW operates four branch offices and three ATMs within the AA. The bank opened one branch in the city of Clinton in October 1998 and has not closed any offices during the evaluation period. All the bank’s offices and ATMs are located in middle-income tracts. Although the bank does not have an office or ATM in a moderate-income tract, branch offices in Warsaw are located in a tract adjacent to the moderate-income tracts. Approximately 87 percent of the population in the AA lives in the middle-income tracts.

UMBW’s business hours and services are convenient to meet the needs of its customers. The main office in Warsaw and branch in Clinton are full-service banking facilities. The branches in Warsaw (Eastgate) and Tightwad do not have loan or investment officers on staff. Customers are referred to the bank’s main office or Clinton locations for these services. Arrangements can be made for loan officers to be available at the limited-service facilities, if requested. Full-service offices in Warsaw and Clinton are open on Saturdays until noon. Extended hours are available on Friday at the Eastgate and Clinton offices. Bank personnel are flexible to accommodate customers after hours if needed.

Alternative delivery systems used to expand the availability of retail banking services include ATMs, Internet banking, direct deposit, bank by mail, and telephone banking. UMBW also sponsored two on-site programs at a local manufacturing company to assist employees with opening new accounts. No information was available on the effectiveness of alternative services in reaching low- and moderate - income individuals. Therefore, we did not place significant weight on these activities when reaching conclusions under the Service Test.

## Community Development Services

UMBW's bank officers provided a good level of community development services during the evaluation period. Bank employees provided their financial expertise to 12 different organizations that promote community development initiatives throughout the AA. A majority of the organizations provide community services targeted to low- and moderate-income individuals such as credit counseling, financial literacy, and home buying programs. Oftentimes, UMBW is a sponsor of these specialized programs. UMBW personnel are also active with organizations that help educate or provide financing to small businesses.

UMBW offers Electronic Transfer Accounts to individuals who receive periodic payments from the federal government. These accounts promote the government's initiative to improve access to financial services and encourage low- and moderate-income individuals to establish accounts to receive their payments. UMBW also participates in the Temporary Aid to Needy Families program in which electronic cards are used to distribute benefits to persons with direct deposit accounts. Recipients can access their benefits through the bank's ATMs.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test: 01/01/2002 to 12/31/2002 Investment and Service Tests: 01/01/1998 to 08/18/2003	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
UMB Bank, Warsaw, National Association (UMBW) Warsaw, Missouri	Small Business and Small Farm Data; Consumer Loans; Qualified Investments; Retail and Community Development Services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
UMB CDC	Subsidiary of UMBFC	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>
Benton and Henry Counties	Full-Scope	

# Appendix B: Market Profiles for Full-Scope Areas

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

Warsaw AA .....	B-2
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**Warsaw AA**

Demographic Information for Full-Scope Area: Warsaw AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	13	0%	23%	77%	0%	n/a
Population by Geography	33,903	0%	13%	87%	0%	n/a
Owner-Occupied Housing by Geography	10,705	0%	15%	85%	0%	n/a
Businesses by Geography	2,320	0%	2%	98%	0%	n/a
Farms by Geography	316	0%	2%	98%	0%	n/a
Family Distribution by Income Level	9,828	23%	22%	21%	34%	n/a
Distribution of Low- and Moderate-Income Families throughout AA Geographies	4,402	0%	17%	83%	0%	n/a
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$21,943 = \$40,600 = 19%	Median Housing Value Unemployment Rate (July 2003)		= \$36,719 = 8.5%		

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

The AA consists of 13 tracts within the counties of Benton and Henry. The AA boundaries meet regulatory guidelines and does not arbitrarily excluded any low- or moderate-income geographies. The AA contains three moderate- and ten middle-income tracts; there are no low- or upper-income tracts in the AA.

Employment industries are primarily retail trade, agriculture, and government. The AA contains vacation sites such as Lake of the Ozarks and Truman Lake. Current economic conditions are impacting tourism, which generally helps to support the retail sector. The July 2003 unemployment rate in the AA is high at 8.5 percent. This compares unfavorably to the state rate of 5.6 percent and the national rate of 6.2 percent for the same time-period.

There are 13 financial institutions with a presence in the AA. Five banks, including UMBW are similar in asset size; four are subject to CRA data collection; and two have intrastate operations. A UMBFC affiliate bank also has a presence in this AA.

We performed two community contacts with members of local economic development organizations. Small business, affordable housing, and home improvement loans are cited, as primary credit needs. The state of the economy and high unemployment is a factor to resident’s spending ability. Community contacts stated all the area financial institutions participate in local projects and are meeting community needs.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

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

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

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

- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans** - 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.

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: BENTON & HENRY COUNTIES												
Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002												
Assessment Area:	% of Rated Area Loans (#) in AA <sup>*</sup>	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans <sup>**</sup>		Total Reported Loans		% of Rated Area Deposits in AA <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Warsaw AA	100.00	17	666	43	1,401	59	2,484	0	0	102	3,885	100.00

Home mortgage lending totals are presented for informational purposes only. These totals are not reflected in the Total Reported Loans shown above.

**Table 1a. Other Products**

LENDING VOLUME												
Geography: BENTON & HENRY COUNTIES												
Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002												
Assessment Area:	% of Rated Area Loans (#) in AA <sup>*</sup>	Total Optional Loans		Home Equity		Motor Vehicle		Other Secured Consumer		Other Unsecured Consumer		% of Rated Area Deposits in AA <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Warsaw AA	100.00	337	3,245	20	643	262	2,293	46	289	9	20	100.00

<sup>\*</sup> Loan Data as of December 31, 2002. Rated area refers to the assessment area.

<sup>\*\*</sup> The evaluation period for Community Development Loans is January 1, 2002 to December 31, 2002.

<sup>\*\*\*</sup> Deposit Data as of June 30, 2002. Rated area refers to the assessment area.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: BENTON & HENRY COUNTIES					Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002								
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
Warsaw AA	7	100%	n/a	n/a	15%	0%	85%	100%	n/a	n/a	n/a	n/a	n/a	n/a	n/a

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

Geographic Distribution: HOME IMPROVEMENT		Geography: BENTON & HENRY COUNTIES					Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002								
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
Warsaw AA	3	100%	n/a	n/a	15%	0%	85%	100%	n/a	n/a	n/a	n/a	n/a	n/a	n/a

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

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: BENTON & HENRY COUNTIES					Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002								
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
Warsaw AA	7	100%	n/a	n/a	15%	14%	85%	86%	n/a	n/a	n/a	n/a	n/a	n/a	n/a

\* UMB Bank, Warsaw, N.A. is not subject to Home Mortgage Data Collection and Reporting. Therefore, no market share data is presented in this evaluation.

\*\* UMB Bank, Warsaw, N.A. is not subject to Home Mortgage Data Collection and Reporting. Information presented for home purchase, home improvement and home refinance loans is based on the actual number of origination during the evaluation period in the assessment area.

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

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

Geographic Distribution: MULTIFAMILY		Geography: BENTON & HENRY COUNTIES						Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002							
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
Warsaw AA	0	0	n/a	n/a	0%	0%	100%	0%	n/a	n/a	n/a	n/a	n/a	n/a	n/a

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

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: BENTON & HENRY COUNTIES						Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002							
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
Warsaw AA	43	100%	n/a	n/a	2%	7%	98%	93%	n/a	n/a	15.59	n/a	43.33	15.34	n/a

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

Geographic Distribution: SMALL LOANS TO FARMS		Geography: BENTON & HENRY COUNTIES						Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002							
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
Warsaw AA	59	100%	n/a	n/a	2%	17%	98%	83%	n/a	n/a	72.20	n/a	100.00	66.87	n/a

\* UMB Bank, Warsaw, N.A. is not subject to Home Mortgage Data Collection and Reporting. Therefore, no market share data is presented in this evaluation.

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

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

\*\*\*\* Source Data – Dun and Bradstreet (2002)

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

Borrower Distribution: HOME PURCHASE		Geography: BENTON & HENRY COUNTIES					Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002									
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>					
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans	% Families <sup>***</sup>	% BANK Loans	% Families <sup>***</sup>	% BANK Loans	% Families <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Warsaw AA	7	100%	23%	29%	22%	0%	21%	14%	34%	57%	n/a	n/a	n/a	n/a	n/a	

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

Borrower Distribution: HOME IMPROVEMENT		Geography: BENTON & HENRY COUNTIES					Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002									
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>					
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans	% Families <sup>***</sup>	% BANK Loans	% Families <sup>***</sup>	% BANK Loans	% Families <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Warsaw AA	3	100%	23%	0%	22%	0%	21%	100%	34%	0%	n/a	n/a	n/a	n/a	n/a	

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

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: BENTON & HENRY COUNTIES					Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>					
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans	% Families <sup>***</sup>	% BANK Loans	% Families <sup>***</sup>	% BANK Loans	% Families <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Warsaw AA	7	100%	23%	0%	22%	33%	21%	33%	34%	34%	n/a	n/a	n/a	n/a	n/a	

<sup>\*</sup> UMB Bank, Warsaw, N.A. is not subject to Home Mortgage Data Collection and Reporting. Therefore no market share data is presented in this evaluation.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. 100% of income information was available for home purchase and home improvement loans. No information was available for 14% of home refinance loans.

<sup>\*\*\*</sup> Percentage of Families is based on 1990 Census information.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: BENTON & HENRY COUNTIES				Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002			
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 <sup>*</sup>	
	#	% of Total	% of Businesses <sup>**</sup>	% BANK Loans <sup>***</sup>	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Warsaw AA	43	100%	78%	93%	91%	9%	0%	15.59	29.24

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: BENTON & HENRY COUNTIES				Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002			
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 <sup>*</sup>	
	#	% of Total	% of Farms <sup>****</sup>	% BANK Loans <sup>*****</sup>	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Warsaw AA	59	100%	97%	95%	85%	13%	2%	72.20	73.37

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

Geographic and Borrower Distribution: CONSUMER LOANS		Geography: BENTON & HENRY COUNTIES										Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002							
Assessment Area:	Geographic Distribution										Borrower Distribution								
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		
	#	% of Total	% of Hhlds <sup>*****</sup>	% of BANK Loans	% of Hhlds <sup>*****</sup>	% of BANK Loans	% of Hhlds <sup>*****</sup>	% of BANK Loans	% of Hhlds <sup>*****</sup>	% of BANK Loans	% of Hhlds <sup>*****</sup>	% of BANK Loans	% of Hhlds <sup>*****</sup>	% of BANK Loans	% of Hhlds <sup>*****</sup>	% of BANK Loans	% of Hhlds <sup>*****</sup>	% of BANK Loans	
Warsaw AA	337	100%	n/a	n/a	13%	6%	87%	94%	n/a	n/a	26%	20%	19%	20%	19%	24%	36%	36%	

<sup>\*</sup> Based on 2001 Peer Small Business Data: US&PR.

<sup>\*\*</sup> Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B – 2002).

<sup>\*\*\*</sup> Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. The bank collected revenue information on 100% of its small loans to businesses.

<sup>\*\*\*\*</sup> Farm loans with revenues of \$1 million or less as a percentage of all farms (Source D&B – 2002).

<sup>\*\*\*\*\*</sup> Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. The bank collected revenues information on 100% of its small loans to farms.

<sup>\*\*\*\*\*</sup> Percentage of Households is based on the 1990 Census information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: BENTON & HENRY COUNTIES									
Evaluation Period: JANUARY 1, 1998 TO AUGUST 18, 2003									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Warsaw AA	1	29	20	62	21	91	100%	0	0

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		
Geography: BENTON & HENRY COUNTIES																		
Evaluation Period: JANUARY 1, 1998 TO AUGUST 18, 2003																		
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	
Warsaw AA	100%	4	100%	n/a	0%	100%	n/a	1	0	n/a	0	+1	n/a	n/a	13%	87%	n/a	

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

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