



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

August 1, 2011

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

UMB Bank Colorado, National Association
Charter Number: 23905

1670 Broadway
Denver, CO 80202

Office of the Comptroller of the Currency

MIDSIZE BANK SUPERVISION
250 E Street, SW
Washington, DC 20219

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 Colorado, National Association (UMB) with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

- Lending activity is good. Small business loan activity is adequate. The dollar volume of community development lending is significant. Home mortgage loan activity is not significant and not a major focus for UMB.
- The geographic distribution of small loans to businesses and home mortgage loans is excellent.
- Borrower distribution of small loans to businesses is poor. The distribution of home mortgage loans is good.
- The level of community development lending is excellent, which had a positive impact on the lending test rating. The bank originated loans totaling \$248 million during the evaluation period.
- The level of qualified investments is good.
- Service delivery systems are readily accessible to geographies and individuals of different income levels in its Assessment Area (AA).

Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the 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 Colorado, National Association (UMB) is a \$1.4 billion intrastate financial institution headquartered in Denver, Colorado. UMB is a wholly owned subsidiary of UMB Financial Corporation (UMBFC), a \$13 billion regional, multi-bank holding company headquartered in Kansas City, Missouri. UMBFC consists of four national bank charters with branches in Missouri, Kansas, Illinois, Oklahoma, Nebraska, Colorado, and Arizona. The company also is engaged in asset management and other related financial services. Subsidiaries of UMBFC and the lead bank, UMB Bank, N.A., include brokerage and insurance companies, registered investment advisors for proprietary mutual funds, and an investment services group based in Milwaukee, Wisconsin. UMB affiliate, Kansas City Financial Corporation, holds the investment portfolio and provided information for consideration under the Investment Test.

UMB is a full-service banking institution, which offers a wide variety of retail and commercial banking services. The primary lending focus is commercial lending. As of June 30, 2011, UMB's loan portfolio, by dollar volume, consisted of 72 percent commercial, 26 percent residential real estate, 1 percent loans to individuals, and 1 percent other loans. Net loans represent 39 percent of total assets. Net Tier One Capital is \$96 million.

UMB operates 14 branches and 19 Automated Teller Machines (ATMs) in the state of Colorado. Eight branches and 13 ATMs are in the Denver MA, and six branches and six ATMs are in the Colorado Springs MA.

UMB completed the acquisition of Citadel Bank on October 31, 2008. Citadel Bank was a \$284 million community bank operating one banking facility located in Colorado Springs, CO. The acquisition substantially increased UMB's assets and capital levels and increased the number of bank branches by one.

There are no legal, financial, or other factors that impede the bank's ability to help meet credit needs in its assessment areas. UMB received an "Outstanding" rating at its last CRA examination dated February 5, 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, 2010.

For CD loans, the Investment Test and Service Test, the evaluation period is from February 6, 2007 to August 1, 2011. The Investment Test included a review of investments and donations originated in the bank's AAs that meet the definition of CD investments. At the bank's request, we considered qualified investments made by its affiliate. The Service Test included a review of retail and CD services provided in the bank's AAs.

Small loans to farms were not evaluated since they represent less than one percent of total reported loans during the evaluation period. The bank originated only one small farm loan in the full-scope assessment area and four in the limited-scope assessment area. Consumer loans do not constitute a substantial majority of the bank's business.

The bank adequately addressed the community development needs in its AA. Therefore, consideration is given to CD activities that were made at the broader statewide area that includes the bank's AA, but has no potential to benefit its AAs. These activities are discussed under the Investment Test and are shown on Table 14.

During the evaluation period, the economy suffered due to a severe recession. As a result, business activity slowed considerably and loan demand declined.

Data Integrity

We verified the accuracy of 2007-2010 data for Home Mortgage Disclosure Act (HMDA) reportable loans and small loans to businesses. As a result of our initial review, we required the bank to correct small business loan data errors. Subsequently, we performed a follow-up review and found data to be accurate and reliable. We evaluated CD loan, investment, and service information during the examination.

Selection of Areas for Full-Scope Review

We performed a full-scope review in the bank's Denver MSA AA, which represents 84 percent of loan activity and 69 percent of deposit activity. We performed limited scope procedures for the Colorado Springs MA AA. Refer to appendix A for more information.

Ratings

The bank's overall rating is based primarily on the area that received a full-scope review.

The Lending Test is more heavily weighted than the Investment and Service Test. Within the Lending Test, ratings were primarily based on the bank's performance regarding small loans to

businesses, which represents 90 percent of the total number of reported loans during the evaluation period. Minimal weight is given to home mortgage lending since it is not a major focus for the bank and represents less than 6 percent (by number) of reported loans in the full-scope AA.

Other

We contacted an affordable housing organization in the full-scope AA. Our contact identified affordable housing financing, particularly for small unit projects less than \$5 million, as the primary credit need in the community. Another recent contact identified financial literacy training and technical assistance to Community Development Financial Institutions as a need in the AA.

Fair Lending or Other Illegal Credit Practices Review

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

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

Refer to Table 1 "Lending Volume" in appendix C for the facts and data used to evaluate the bank's lending activity.

Lending activity reflects good responsiveness in relation to area credit needs and the bank's deposit market share. UMB has a deposit market share of one percent, which ranks sixteenth in the Denver MA. Our analysis is based on 2010 peer data.

Small business loan activity is adequate with an overall market share of 0.57 percent and a ranking of eighteenth. Competition is strong. There are over 85 institutions operating in the AA. Large nationwide banks hold over 40 percent of the deposit market share and over 65 percent of small business market share.

Community development lending is significant by dollar volume. During the evaluation period, UMB originated 82 loans totaling \$248 million.

The market share for home mortgage loan activity is not significant. UMB does not have any share of the market for home purchase loans. For home improvement and refinance loans, market share is less than 0.04 percent, respectively. These loans are not a major focus for UMB and are very limited.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is excellent.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans is excellent. Home refinance loans received the most weight in our analysis. Home refinance, home purchase, home improvement and multifamily loans represent 70 percent, 11 percent, 8 percent, and 11 percent, respectively, of the total number of home mortgage loans made during the evaluation period.

Performance in low-income tracts is excellent. The distribution of home purchase, home improvement, refinance and multifamily loans exceeds the demographics in these tracts.

Performance in moderate-income tracts is excellent. The distribution of home purchase, refinance and multifamily loans exceeds the demographics in these tracts. The distribution of home improvement loans is near to demographics.

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 origination/purchase of small loans to businesses.

Performance in low- and moderate-income tracts is excellent. The distribution of loans in these geographies exceeds the demographics.

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 conspicuous gaps in the Denver MA.

Inside/Outside Ratio

We performed this analysis at the bank level based on UMB originations and purchases. UMB originated a substantial majority of its loans within its AAs: 95 percent by number and 93 percent by dollar volume. For small business loans, 96 percent by number and 94 percent by dollar volume are within its AAs. Home mortgage loans within the AAs are 83 percent by number and 82 percent by dollar volume. Within this category, home refinance loans carry the most weight and have 84 percent by number and dollar volume within the AAs. The impact on the analysis of the geographic distribution of lending is positive.

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 appendix C 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. In evaluating the distribution to low-income borrowers, we considered that six percent of families live below the poverty level. UMB did not originate or purchase any home purchase loans in low- or moderate-income tracts during the evaluation period.

Lending to moderate-income borrowers is adequate. The distribution of refinance loans is somewhat below the demographics in these geographies. The distribution of home improvement loans exceeds the demographics.

Lending to low-income borrowers is excellent. The distribution of refinance loans is somewhat below the demographics in these geographies but is excellent considering the percent of families below poverty. UMB did not originate or purchase any home improvement loans in these geographies during the evaluation period.

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 origination/purchase of small loans to businesses.

Lending performance to businesses of different sizes is poor. The distribution of loans to businesses with revenues of \$1 million or less is well below demographics. UMB's market share is not significant.

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 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.

The level of CD lending is excellent, which had a positive impact on the Lending Test rating.

During the evaluation period, UMB originated 82 loans totaling \$248 million in the Denver MA. A significant majority of these loans (87 percent by number) promoted economic development by financing businesses that meet the size eligibility standards. They also support permanent job creation and/or retention for low- and moderate-income (LMI) individuals.

The 82 loans represent 36 different businesses. Over 85 percent of these loans provided working capital to support payroll and business operations. Over 45 percent of the businesses are located in LMI census tracts and/or within an Enterprise Zone.

Product Innovation and Flexibility

UMB did not provide information on innovative or flexible product offerings targeted to LMI individuals or geographies. The impact on the Lending Test rating is neutral.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Colorado Springs MA is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test.

Refer to Tables 1 through 13 in appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Denver MA is good.

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

UMB made 144 qualified investments and donations in the Denver MA totaling \$3.4 million. All were made in the current period. Two qualified investments totaling \$2.7 million represent a pool of purchased mortgage loans to LMI borrowers. One of the qualified investments for \$501 thousand was made by the bank's affiliate, Kansas City Financial Corporation, which holds the investment portfolio. No other affiliate has claimed this investment. These investments helped provide affordable housing, which is a primary credit need in the AA.

Qualified donations total \$677 thousand. A majority (89 percent by number) were to over 40 different organizations to help provide community services to LMI individuals. Donations totaling \$184 thousand helped support youth programs targeted to LMI families. UMB also donated \$44.5 thousand to a hospital foundation that primarily provides services to LMI families to prevent child abuse.

We also gave consideration to statewide investments and donations with the potential to benefit the AA totaling \$15 thousand. All were made during the current period. One investment of \$12 thousand represents a grant to a nonprofit organization that provides financial counseling targeted to LMI individuals. UMB also donated \$3 thousand to an organization that assists children from low-income families.

UMB adequately addressed CD needs in its AA. Therefore, consideration is given to a donation made at the broader statewide area that has no potential benefit to the AA. This donation of \$2.5 thousand was made in the current period to an organization that provides emergency shelter and other services to homeless families.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Colorado Springs MA is not inconsistent with the bank's overall "High Satisfactory" performance under the investment test. During the evaluation period, UMB made 26 investments and donations in this AA totaling \$1.3 million. Performance is good. Approximately 30 percent of deposits and 16 percent of loans are in this AA.

Refer to Table 14 in appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "Outstanding". Based on full-scope reviews, the bank's performance in the Denver MA is excellent.

Retail Banking Services

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.

UMB branches are readily accessible to geographies and individuals of different income levels in its AA. Eight branches are located in the Denver MA. One branch is located in a low-income tract and two are in moderate-income tracts. The percentage of branches in low-income geographies exceeds demographics. UMB has 25 percent of its branches in moderate-income geographies where 29 percent of the population resides.

During the evaluation period, UMB opened two branches in the Denver MA. One branch opened in a moderate-income tract and another branch opened in a middle income tract. There were no branch closings during this time period. Activity during this evaluation period improved accessibility of UMB's delivery systems in moderate-income geographies and to low- and moderate-income individuals.

UMB has 13 ATM's in the AA. One is at the branch located in a low-income tract. Four ATM's are in moderate-income tracts; two are at branch locations and two are in local hospitals. One of six ATM's that accepts deposits is in a moderate-income tract. Eleven ATM's offer menu options in English or Spanish.

Banking hours are reasonable. Drive-up facilities are located at six of the eight locations and are open Monday – Saturday. One is in a low-income tract and one is in a moderate-income tract. Five branches offer lobby hours on Saturday; one is in a moderate-income tract. Services do not vary in a way that inconveniences its AAs, particularly LMI geographies and LMI individuals.

Community Development Services

UMB provides a good level of CD services. Services were provided to 14 different organizations. A majority of these services provided community services to LMI individuals. Examples of these services include financial literacy programs, mentoring and scholarships for youth from LMI families, and training and career services. Financial literacy training is an identified need in the AA.

UMB participates in the Colorado Quest and Temporary Aid to Needy Families Program. Benefit payments provided by the state are issued via electronic access cards. Recipients can access these funds at any UMB ATM for a nominal fee.

UMB also offers Electronic Transfer Accounts. These are low-cost accounts for individuals who receive payments (primarily Social Security or disability) from the federal government.

This service supports the government's initiative to improve access to financial services by encouraging LMI individuals to establish deposit accounts to receive their payments.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Colorado Springs MA is weaker than the bank's overall "Outstanding" performance under the Service Test. The percentage of branches in low-income geographies exceeds demographics and performance is below demographics in moderate-income geographies. Overall performance is good. The impact on the Service Test rating is neutral.

Refer to Table 15 in appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities 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”).

Time Period Reviewed	Lending Test (excludes CD Loans): 1/1/2007 to 12/31/2010 Investment and Service Tests and CD Loans: 2/6/2007 to 8/1/2011	
Financial Institution	Products Reviewed	
UMB Bank Colorado, National Association Denver, Colorado	Home Mortgage, Small Business, and Community Development Loan Data; Qualified Investments; Retail and Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Kansas City Financial Corporation	Subsidiary of UMB Bank, National Association	Qualified Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Denver-Aurora-Broomfield, CO #19740	Full-Scope	Adams, Arapahoe, Denver, Douglas, and Jefferson Counties
Colorado Springs, CO #17820	Limited-Scope	El Paso County

Appendix B: Market Profiles for Full-Scope Areas

Denver MA

Demographic Information for Full-Scope Area: Denver MA (Adams, Arapahoe, Denver, Douglas, and Jefferson Counties)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	512	4.10	27.93	38.67	28.52	0.78
Population by Geography	2,092,289	4.75	28.69	39.19	27.25	0.12
Owner-Occupied Housing by Geography	543,855	1.98	22.72	41.92	33.38	0.00
Businesses by Geography	209,764	3.51	22.43	36.30	36.88	0.89
Farms by Geography	3,807	1.76	18.75	39.53	39.58	0.37
Family Distribution by Income Level	526,488	18.42	18.91	23.66	39.00	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	196,552	7.89	42.80	36.40	12.91	0.00
Median Family Income = \$61,301 HUD Adjusted Median Family Income for 2010 = \$75,900 Households Below the Poverty Level = 7.41%				Median Housing Value = \$180,126 Unemployment Rate (December 2010) = 8.9%		

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

Source: 1990 U.S. Census, and 2010 HUD updated MFI.

The Denver MA AA consists of the following counties: Adams, Arapahoe, Denver, Douglas, and Jefferson. This AA complies with the regulation and does not arbitrarily exclude LMI areas. The bank's primary business focus is commercial lending. There are 21 low-income, 143 moderate-income, 198 middle-income, and 146 upper-income census tracts in the AA. Four census tracts have not been assigned an income designation.

Economic performance in the AA suffered during the recession, including higher unemployment rates. The Denver unemployment rate in December 2010 compares to an unemployment rate of 8.7 percent in Colorado and a 9.4 percent national unemployment rate during the same timeframe. Competition is strong with over 85 institutions in the AA competing for deposit market share.

UMB has eight full-service branches and 13 ATM's in the AA. Major employers include the U.S., State, and local governments. The University of Colorado and Denver Public Schools also provide significant employment opportunities. Affordable housing is identified as a primary credit need in the AA. Adequate opportunities exist to participate in CD activities.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 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 description.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2 description.
- 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 description.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8 description.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

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

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

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

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: COLORADO				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010						
Assessment Area	% of Rated Area Loans (#) in MA/AA [*]	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans ^{**}		Total Reported Loans		% of Rated Area Deposits in MA/AA ^{**}
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Denver MA AA	84.00	112	35,418	1,827	342,754	1	50	82	248,155	2,022	626,377	69.32
Limited Review:												
Colorado Springs MA AA	16.00	27	3,161	337	55,606	4	800	17	82,150	385	141,717	30.68

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

** The evaluation period for Community Development Loans is from February 06, 2007 to August 01, 2011.

*** Deposit Data as of June 30, 2010. 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 2010		Geography: COLORADO					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31,					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mid	High		
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Denver MA AA	12	75.00	1.98	16.67	22.72	25.00	41.92	16.67	33.38	41.67	0.00	0.00	0.02	0.00	0.00	
Limited Review:																
Colorado Springs MA AA	4	25.00	0.12	0.00	19.55	50.00	49.48	50.00	30.85	0.00	0.02	0.00	0.04	0.02	0.00	

* Based on 2009 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT 31, 2010		Geography: COLORADO						Evaluation Period: JANUARY 1, 2007 TO DECEMBER							
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	Upper
Full Review:															
Denver MA AA	9	75.00	1.98	22.22	22.72	22.22	41.92	0.00	33.38	55.56	0.03	0.00	0.00	0.00	0.08
Limited Review:															
Colorado Springs MA AA	3	25.00	0.12	0.00	19.55	0.00	49.48	100.00	30.85	0.00	0.20	0.00	0.00	0.43	0.00

* Based on 2009 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2010		Geography: COLORADO						Evaluation Period: JANUARY 1, 2007 TO							
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	Med	Mid	Upper
Full Review:															
Denver MA AA	78	79.59	1.98	6.41	22.72	33.33	41.92	32.05	33.38	28.21	0.02	0.10	0.05	0.03	0.01
Limited Review:															
Colorado Springs MA AA	20	20.41	0.12	0.00	19.55	20.00	49.48	70.00	30.85	10.00	0.03	0.00	0.03	0.04	0.01

* Based on 2009 Peer Mortgage Data (USPR)

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

*** Percentage of 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 2010		Geography: COLORADO					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31,					Market Share (%) by Geography				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Medium	Mid	Upper	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Denver MA AA	13	100.00	8.62	23.08	41.07	46.15	41.50	30.77	8.81	0.00	3.45	8.33	3.70	2.50	0.00	
Limited Review:																
Colorado Springs MA AA	0	0.00	0.76	0.00	43.58	0.00	44.09	0.00	11.57	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2009 Peer Mortgage Data (USPR)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2010		Geography: COLORADO								Evaluation Period: JANUARY 1, 2007 TO					
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 Business es ***	% BANK Loans	% of Business es ***	% BANK Loans	% of Business es ***	% BANK Loans	% of Business es ***	% BANK Loans	Overall	Lo w	Mo d	Mid	Upp
Full Review:															
Denver MA AA	1,804	84.26	3.51	7.93	22.43	31.93	36.30	40.91	36.88	19.24	0.57	1.59	0.68	0.78	0.26
Limited Review:															
Colorado Springs MA AA	337	15.74	4.14	0.59	22.10	35.61	41.29	43.92	32.47	19.88	0.71	0.17	1.23	0.73	0.51

* Based on 2009 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2010).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS 31, 2010		Geography: COLORADO						Evaluation Period: JANUARY 1, 2007 TO DECEMBER							
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Denver MA AA	1	20.00	1.76	0.00	18.75	0.00	39.53	0.00	39.58	100.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Colorado Springs MA AA	4	80.00	1.84	0.00	16.55	100.00	53.24	0.00	28.36	0.00	3.64	0.00	40.00	0.00	0.00

* Based on 2009 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2010).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 2010		Geography: COLORADO						Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31,							
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 ¹	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Up p
Full Review:															
Denver MA AA	12	75.00	18.42	0.00	18.91	0.00	23.66	0.00	39.00	100.00	0.00	0.00	0.00	0.00	0.01
Limited Review:															
Colorado Springs MA AA	4	25.00	17.17	0.00	18.97	0.00	24.84	0.00	39.03	100.00	0.01	0.00	0.00	0.00	0.05

* Based on 2009 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 25.0% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 2010		Geography: COLORADO								Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31,					
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 ²	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Up p
Full Review:															
Denver MA AA	9	75.00	18.42	0.00	18.91	20.00	23.66	20.00	39.00	60.00	0.04	0.00	0.00	0.00	0.08
Limited Review:															
Colorado Springs MA AA	3	25.00	17.17	0.00	18.97	0.00	24.84	66.67	39.03	33.33	0.21	0.00	0.00	0.41	0.24

* Based on 2009 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 33.3% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE 31, 2010		Geography: COLORADO						Evaluation Period: JANUARY 1, 2007 TO DECEMBER							
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 ³	% BANK Loans ^{****}	% Families [*] **	% BANK Loans ^{****}	% Families [*] **	% BANK Loans ^{***} *	Overall	Low	Mod	Mid	Up
Full Review:															
Denver MA AA	78	79.59	18.42	12.82	18.91	15.38	23.66	7.69	39.00	64.10	0.01	0.00	0.01	0.00	0.02
Limited Review:															
Colorado Springs MA AA	20	20.41	17.17	6.25	18.97	12.50	24.84	12.50	39.03	68.75	0.02	0.06	0.02	0.02	0.02

^{*} Based on 2009 Peer Mortgage Data (USPR)

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

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

^{****} As a percentage of loans with borrower income information available. No information was available for 43.9% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2010		Geography: COLORADO			Evaluation Period: JANUARY 1, 2007 TO				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Denver MA AA	1,827	84.43	79.74	28.30	62.23	12.59	25.18	0.57	0.40
Limited Review:									
Colorado Springs MA AA	337	15.57	81.53	45.10	58.16	26.41	15.43	0.71	1.45

* Based on 2009 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2010).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 4.25% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: COLORADO			Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Denver MA AA	1	20.00	94.67	100.00	100.00	0.00	0.00	0.00	0.00
Limited Review:									
Colorado Springs MA AA	4	80.00	95.35	100.00	75.00	0.00	25.00	3.64	4.88

* Based on 2009 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2010).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS 2011		Geography: COLORADO				Evaluation Period: FEBRUARY 6, 2007 TO AUGUST 1,			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Denver MA AA	0	0	144	3,405	144	3,405	0.00	0	0
Limited Review:									
Colorado Springs MA AA	0	0	26	1,287	26	1,287	0.00	0	0
Statewide with potential to benefit the AA	0	0	3	15	3	15		0	0
Statewide, no potential benefit to AA	0	0	1	3	1	3		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: COLORADO				Evaluation Period: FEBRUARY 6, 2007 TO AUGUST 1, 2011					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Denver MA AA	0.00	8	57.14	12.50	25.00	25.00	37.50	2	0	0	1	1	0	4.75	28.69	39.19	27.25
Limited Review:																	
Colorado Springs MA AA	0.00	6	24.86	16.67	16.67	33.33	33.33	1	1	0	0	0	0	0.34	26.24	47.96	25.46