



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act **Performance Evaluation**

UMB National Bank of America
Charter Number: 4945

100 South Santa Fe
Salina, KS 67401

Office of the Comptroller of the Currency

Mid-size Banks - Blue
440 South LaSalle Street 2700
Chicago, IL 60605

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 National Bank of America** with respect to the Lending, Investment, and Service Tests:

Performance Levels	UMB National Bank of America Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	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:

- UMB National Bank of America’s (UMBNBA) responsiveness to community credit needs is very good. A substantial majority of the bank’s loans (79 percent) are within its designated assessment areas. The distribution of loans by borrower income level demonstrates good performance in small business, small farm, and home mortgage lending. The geographic distribution of loans is adequate given there are no low- and only three moderate-income tracts in the full-scope assessment areas. Community Development lending performance had a positive impact to the overall rating.
- UMBNBA’s level of qualified community development investments is very good. Qualified investments are responsive to community development needs within the assessment areas served by the bank. They addressed affordable housing needs and provided needed support to charitable organizations that provide community and social services targeted to low- and moderate-income individuals.
- UMBNBA’s delivery systems are accessible to geographies and individuals of different income levels. Several no- and low-cost products offered by the bank target LMI individuals, including products designed to assist individuals receiving public assistance. Bank personnel provided a good level of community development services by providing their financial expertise and assistance to organizations that primarily benefit low- and moderate-income individuals or promote economic development.

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.

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 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 National Bank of America (UMBNBA) is a \$544 million intrastate financial institution headquartered in Salina, Kansas. UMBNBA is a subsidiary of UMB Financial Corporation (UMBFC), an \$8 billion interstate holding company headquartered in Kansas City, Missouri. UMBFC owns and operates five national bank charters with locations in Missouri, Kansas, Illinois, Oklahoma, Nebraska, Arizona, and Colorado. UMBFC also operates two non-bank subsidiaries that provide Trust and Insurance services. UMBNBA has not participated in any mergers or acquisitions during the evaluation period.

UMBNBA is a full-service bank offering a wide array of loan products. The bank's primary lending focus is agricultural loans, followed by commercial loans. As of June 30, 2006, the loan portfolio totaled \$198 million and was distributed as follows: 30 percent agricultural, including loans secured by farmland; 28 percent commercial and commercial real estate; 20 percent consumer; 20 percent residential real estate; and 2 percent other. Net loans represented 37 percent of the bank's total assets and the loan-to-deposit ratio was 51 percent. Although loan levels appear low in comparison to total assets and deposits, the bank's primary objective is to meet the credit needs of the community. Excess funds are invested in US Treasury securities that can be easily converted to support loan demand.

UMBNBA operates 23 branches in Kansas. Eight branches are full-service offices located in north central Kansas. These offices serve the bank's assessment areas (AAs) of Russell/Great Bend (Barton, Russell, and Stafford Counties); Salina/Abilene (Saline and Dickinson Counties); Concordia (Cloud County); and Manhattan (Riley and Pottawatomie Counties). During the assessment period, the bank sold the branches located in the Concordia AA. However, our analysis includes a review of activity in this AA as it was operational for most of the evaluation period.

The remaining 15 branches are located within an existing affiliate branch facility. These "dual" branches are located in the Kansas City, Wichita, and Topeka Metropolitan Areas (MA). This structure was designed to accommodate state statutes that restrict public funds to banks chartered and headquartered in Kansas. The branches do not originate any loans for UMBNBA and all public funds received by these locations are reported under the main branch in Salina, KS.

UMBNBA has the financial capacity to assist in meeting the credit needs of its assessment areas. There are no legal or financial constraints that impede the bank's CRA efforts. UMBNBA received a "Satisfactory" rating on its last CRA evaluation dated July 22, 2002.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the lending test, excluding community development loans, is January 1, 2002 through December 31, 2005. Products reviewed in the lending test include home mortgage, small business, and small farm. We used 2004 peer lending data, the most recent data available, for home mortgage, small business, and small farms to compare UMBNBA's lending performance to other reporting lenders in each AA.

The evaluation period for the investment and service tests, as well as for community development loans, is July 23, 2002 through June 6, 2006. At the bank's request, we considered qualified investments made, and services provided by affiliates.

We used deposit information, reported to the Federal Deposit Insurance Corporation annually, to determine the bank's deposit market share and market presence within its AAs. The most recent deposit information available was as of June 30, 2005.

Tables included in appendix C of this report detail the bank's lending activity for 2004 and 2005. Tables detailing activity for 2002 and 2003 were omitted from the report. However, a review of the reported activity in 2002 and 2003 was performed and the analysis included in this report.

Data Integrity

To assess the accuracy of the data, we conducted an independent test of data for home mortgage, small business, and small farm loan products. We identified a material error in the small business and small farm data for calendar year 2003 involving the inaccurate reporting of critical information. The bank performed a full review of all affected loans, correcting all identified errors. We tested the loan data and determined it to be substantially accurate. It is used without exception in this evaluation.

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

Selection of Areas for Full-Scope Review

We selected the Russell/Great Bend and Salina/Abilene AAs for full-scope review. These two AAs contain the highest level of deposits and loans and are representative of the markets in which the bank operates. The bank's headquarters is located in the Salina/Abilene AA. We performed limited-scope reviews in the Concordia and Manhattan AAs. We did not identify any significant performance differences in these AAs to warrant expanding our review.

For the MAs with "dual" branches, we determined if CRA performance was consistent with the bank's overall performance. Since UMBNBA does not have any CRA activity attributed to these AAs, the bank's performance was inconsistent with the overall bank performance. However, given the business strategy for these locations, this does not impact the bank's overall performance. Additionally, the bank's Kansas City affiliate offers full banking services

in these locations. UMBNBA does not compete for business in these locations. No further analysis of the MAs is contained in the Performance Evaluation.

Ratings

The bank's overall rating is based primarily on those areas that received full-scope reviews. We gave equal weight to performance in both full-scope AAs since the largest volume of the bank's loans are attributed to the Russell/Great Bend AA and the largest volume of deposits are attributed to the Salina/Abilene AA. Collectively these AAs comprise 78 percent and 77 percent of the bank's total deposit and loan volume, respectively.

By product type, we gave the most weight to farm lending in the Russell/Great Bend AA and to small business lending in the Salina/Abilene AA. Home mortgage lending received less weight in the analysis, as the bank is not a significant home mortgage lender. Refer to appendix A of this report for details of the bank's lending activities.

Other

We conducted one community contact during this evaluation. The community contact identified small business and agricultural-related lending as primary credit needs. Refer to the **Market Profiles** section in appendix B of this report for a complete discussion of community contact information.

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 Russell/Great Bend and Salina/Abilene is very good.

Lending Activity

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

Lending levels reflect good responsiveness in relation to area credit needs and the bank's deposit market share. Business and agricultural loans are essential to the local economy and were identified as primary credit needs. Agricultural lending represents the largest volume of loans originated in the Russell/Great Bend AA during the evaluation period. Business lending represents the largest volume of loans originated in the Salina/Abilene AA. Home mortgage lending is not a major focus for the bank. Lending market share data is presented in the analysis; however, it has only limited use. The majority of institutions in the full-scope AAs are not subject to data collection and reporting requirements.

In the Russell/Great Bend AA, the bank originated 2,248 reportable loans during the evaluation period. In this AA, small loans to farms represent the primary loan product by number, followed by small loans to businesses. Lending in this AA represents 44 percent of the bank's reported loans between January 1, 2004 and December 31, 2005. UMBNBA ranked third among 17 financial institutions with 9 percent of the deposit market share as of June 30, 2005. Based on the 2004 Small Business Peer Data, the bank ranked first in market share for small loans to farms, and fifth in market share for small loans to businesses. By number, market share was approximately 41 percent for small loans to farms and 8 percent for small loans to businesses. Home improvement lending activity achieved the strongest market share among home mortgage products ranking fourth among all reporting lenders with 6 percent of the market. The market share for home purchase is 2 percent and for home refinance loans is 1.5 percent. Only 8 of the 17 institutions in the AA are required to collect and report lending data.

In the Salina/Abilene AA, the bank originated 1,913 loans during the evaluation period. Small loans to farms represent the primary loan product by number in this AA, followed closely by small loans to businesses. Lending in this AA represents 33 percent of the bank's reported loans between January 1, 2004 and December 31, 2005. UMBNBA ranked first among 16 financial institutions with 16.5 percent of the deposit market share as of June 30, 2005. Based on the 2004 Small Business Peer Data, UMBNBA ranked third in market share for small loans to farms and sixth in market share for small loans to businesses. Market share was 24 percent and 6 percent, respectively. For home mortgage loan products the bank's strongest market share performance is in home improvement loans ranking sixth among all reporting lenders

with a market share of 3 percent. The market share for refinance loans is 1 percent. The bank did not capture a significant share for home purchase, with less than 1 percent of the market. Only 8 of the 16 institutions in the AA are required to collect and report lending data.

Refer to the ***Scope of Evaluation*** section of this report for a complete description of how we weighted the areas in arriving at the overall Lending Test conclusion.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans is adequate. For small loans to businesses and small loans to farms, the geographic distribution of loans is good. For home mortgage loans, distribution is adequate.

Geographic distribution did not carry substantial weight in the Lending Test analysis. There are no low-income tracts in either of the full-scope AAs. There are two moderate-income tracts in the Russell/Great Bend AA and one moderate-income tract in the Salina/Abilene AA. Conclusions for the geographic distribution are primarily based on performance in the Russell/Great Bend AA.

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 adequate given the limited number of moderate-income tracts and owner-occupied housing units in the AAs; and the limited volume of home mortgage loan originations during the evaluation period.

Home mortgage lending activity is strongest in the Russell/Great Bend AA where in 2004-2005 home improvement lending exceeds area demographics; however home refinance and home purchase lending is significantly lower than demographics. In 2003, the bank originated home improvement loans and refinance loans in the moderate income tracts, though penetration was below area demographics. The bank did not originate any home purchase loans in the moderate-income tracts. In 2002, the bank did not originate any home purchase or home improvement loans in moderate-income tracts, but exceeded area demographics for moderate-income tract for home refinance loans.

Performance is weaker in the Salina/Abilene AA. In 2004-2005 the bank did not make any home purchase or home refinance loans in the moderate income geography, and home improvement lending was significantly below area demographics. In 2003, the bank exceeded area demographics in home purchase lending, but did not originate any home improvement or home refinance loans in the moderate-income tract. Similar performance was noted in 2002. The bank exceeded area demographics for home purchase lending, achieved limited penetration for home improvement loans, did not originate any home refinance loans in moderate-income tracts.

2005 peer market data indicates UMBNBA's market share performance is strongest in home improvement lending in both AAs. In the Russell/Great Bend AA, the bank ranked fourth in

overall market share and sixth in market share for lending in the moderate-income area. In the Salina/Abilene AA, the bank ranked sixth in overall market share and fifth in market share for lending in moderate-income areas. In both AAs, market shares in the moderate-income areas exceed the bank's overall market shares. UMBNBA did not capture a significant overall market share for home purchase and home refinance loans. The bank did not penetrate the moderate-income geographies in either AA for home purchase loans. For home refinance loans, the bank did not penetrate the moderate-income geography in the Salina/Abilene AA and had only minimal penetration in the moderate-income geographies for the Russell/Great Bend AA.

We did not perform an analysis of multifamily loans. Due to the limited number of originations, an analysis of this product type would not be meaningful.

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 and purchase of small loans to businesses.

The geographic distribution of small loans to businesses is adequate. An analysis of activity for 2004-2005 shows UMBNBA's performance is weak in the Russell/Great Bend AA where the percentage of loans in the moderate-income area is significantly below area demographics. However, performance in the Salina/Abilene AA is good, slightly exceeding area demographics. Similar performance was noted in 2003, with market penetration in Russell/Great Bend significantly below area demographics but penetration in the Salina/Abilene AA far exceeding area demographics. Performance was stronger in 2002, with market penetration significantly exceeding area demographics in both AAs.

2005 Peer Business Data indicates that UMBNBA ranked fifth in overall market share in the Russell/Great Bend AA and sixth in the Salina/Abilene AA. In the Salina/Abilene AA, the bank's market share in moderate-income areas exceeds its overall market share.

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 origination and purchase of small loans to farms.

UMBNBA's geographic distribution of small loans to farms is poor. The distribution of small loans to farms in the Russell/Great Bend AA is poor. In 2004-2005 the bank's performance is significantly below the percentage of farms in the moderate-income tract. UMBNBA ranked second in overall market share in the moderate-income tract of the Russell/Great Bend AA, originating two of the 20 total small loans to farms within the AA. Similar performance was noted in 2003. Performance in 2002 was much stronger as the bank's small loans to farms in moderate income geographies substantially exceeded area demographics.

Performance in the Salina/Abilene AA is adequate, reasonably reflecting area demographics. The bank ranked first in overall market share, originating three loans in the moderate-income geography within the AA. In 2003, the bank's performance reasonably reflected area demographics, however, fell short of area demographics in 2002.

The bank's performance in the geographic distribution of small loans to farms did not significantly impact the overall Lending Performance analysis given the small volume of lending by all institutions. 2004 market share data shows only 20 loans were originated by all institutions in the moderate-income geographies of the Russell/Great Bend AA and only three loans were originated by all institutions in the moderate-income geography of the Salina/Abilene AA.

Lending Gap Analysis

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

Inside/Outside Ratio

For the geographic distribution analysis under the Lending Test, we performed an inside/outside ratio analysis at the bank level. A majority of the bank's loans, 79 percent by number, were within the bank's AAs. By product type, 73 percent of home mortgage loans, and 80 percent of reportable business and farm loans were within the bank's AAs. We viewed this as a positive characteristic in our assessment of lending performance.

Distribution of Loans by Income Level of the Borrower

The distribution of loans by income level is good. For small loans to farms and small loans to businesses, borrower distribution is excellent. The borrower distribution of home mortgage loans is good.

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 by income level is good. Lending opportunities to low- and moderate-income borrowers are limited due to a shortage of affordable housing stock coupled with a household poverty rate in both AAs of approximately 12 percent, which hampers the ability of low-income borrowers to qualify for home mortgage loans.

For home purchase loans, performance in 2004-2005 is excellent in the Russell/Great Bend AA where the bank's pattern of lending to low- and moderate-income borrowers exceeded area demographics. In 2003 the bank exceeded area demographics in lending to moderate-income borrowers and achieved reasonable penetration in lending to low-income borrowers. Performance in 2002 was weaker, as the bank's pattern of lending to both low- and moderate-income borrowers was considerably less than area demographics.

In the Salina/Abilene AA, the bank did not originate any loans to low-income borrowers throughout 2002 through 2005. However, the bank's pattern of lending to moderate-income borrowers exceeded area demographics in 2004-2005. The bank's pattern of lending in 2002 and 2003 was weaker with the bank's performance at approximately one-half of area demographic percentages.

UMBNBA did not capture a significant portion of the market share for home purchase loans. 2005 peer data indicated the bank ranked 13th in overall market share in the Russell/Great Bend AA and 27th in the Salina/Abilene AA. However, in the Russell/Great Bend AA, market share to both low- and moderate-income borrowers exceeds the bank's overall market share. In the Salina/Abilene AA, market share to moderate-income borrowers exceeded overall market share.

The distribution of home improvement loans is excellent in both AAs. Although penetration to low-income borrowers in both AAs is less than demographics, performance is considered adequate given the areas poverty levels. Throughout the evaluation period penetration to moderate-income borrowers is excellent in both AAs, significantly exceeding area demographics. Market share performance is strongest in the Russell/Great Bend AA where the bank ranked fourth overall. In the Salina/Abilene AA, the bank ranked sixth. Market share to low- and moderate-income borrowers in the Russell/Great bend AA was consistent with overall market share. Market share to low- and moderate-income borrowers exceeded the bank's overall market share in the Salina/Abilene AA.

The distribution of home refinance loans is good in both AAs. 2004-2005 data indicates that in the Russell/Great Bend AA, the percentage of loans to moderate-income borrowers exceeds demographics. In the Salina/Abilene AA, the bank's penetration to moderate-income borrowers reasonably reflected area demographics. In both AAs, the bank's pattern of lending to low-income borrowers was significantly below demographics. Although penetration to low-income borrowers is below demographics, performance is considered adequate given the costs associated with home refinance loan products and a 12 percent poverty rate in this AA.

Similar performance was noted in 2003 and 2002. Market penetration for lending to moderate-income borrowers in both AAs was substantially similar to area demographics. Performance in the Russell/Great Bend AA in 2003 significantly exceeded demographics. Penetration to low-income borrowers was not reflective of area demographics.

UMBNBA ranked 17th and 24th in overall home refinance lending in the Russell/Great Bend AA and Salina/Abilene AA, respectively. Market share for lending to low- and moderate-income borrowers was higher than the bank's overall market share in the Russell/Great Bend AA. Market share for lending to moderate-income borrowers in the Salina/Abilene AA was consistent with overall market share. The bank did not achieve market share to low-income borrowers in the Salina/Abilene AA.

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 and purchase of small loans to businesses.

UMBNBA's distribution of loans to businesses of different sizes is excellent in both AAs. The percentage of loans to business with revenues of \$1 million or less is significantly higher than area demographics within both AAs. In 2004-2005 approximately 95 percent of the bank's loans in the Russell/Great Bend AA and 76 percent of the bank's loans in the Salina/Abilene AA were originated to businesses with annual revenues less than \$1 million. Substantially all of the small loans to businesses were in amounts of less than \$100,000. The average loan size in the Russell/Great Bend AA and Salina/Abilene AA was \$31,000 and \$89,000, respectively. In both 2003 and 2002, loans originated in amounts less than \$100,000 in the Russell/Great Bend and Salina/Abilene AAs were 100 percent and 76 percent, respectively.

UMBNBA ranked fifth in overall market share in the Russell/Great Bend AA and sixth in overall market share in the Salina/Abilene AA. In both AAs, the bank's market share of loans to businesses with revenues \$1 million or less significantly exceeded its overall market share.

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 farms.

The distribution of loans to farms of different sizes is excellent in both AAs. In the Russell/Great Bend AA, performance in 2004-2005 exceeds area demographics. Further, the bank originated 90 percent of the small loans to farms in amounts of \$100,000 or less, with an average loan size of \$41,000. Over the same time frame in the Salina/Abilene AA, the percentage of small loans to farms with revenues of \$1 million or less is slightly higher than the percentage of farms with revenues of \$1 million or less. UMBNBA originated 77 percent of its loans in amounts of \$100,000 or less, with an average loan size of \$77,000. Performance in both AAs in 2003 and 2002 was substantially similar with the percentage of small loans to farms reflective of area demographics and the vast majority of loans originated in amounts of \$100,000 or less.

UMBNBA ranked first in overall market share the Russell/Great Bend AA and third in overall market share in the Salina/Abilene AA. In both AAs, the bank's market share of loans to farms with revenues of \$1 million or less exceeds its overall market share.

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 multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Community development lending had a positive impact on the Lending Test conclusions for both AAs. Although the loans were not complex or innovative they did promote activities that had a positive impact on the AA.

- UMBNBA originated a \$6.5 million loan for land acquisition and construction of a commercial building through a 501c corporation. Upon completion, the business that

will occupy the building will create more than 50 permanent jobs, the majority of which will benefit low- and moderate-income individuals.

- The bank originated or renewed three loans totaling \$1.89 million to a non-profit organization to construct new homes to serve as affordable group homes for low- and moderate-income individuals with disabilities.
- The bank, in participation with other community lenders, originated a loan for \$287,000 to refinance an affordable housing complex primarily occupied by senior citizens and handicapped individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in both the Concordia AA and the Manhattan AA is not inconsistent with the bank's overall "high satisfactory" Lending Test rating.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

The bank's performance under the investment test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Salina/Abilene AA is strong and in the Russell/Great Bend AA 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 NBA's level of qualified investments demonstrates strong responsiveness given the limited opportunities in both full-scope AAs. This assessment of limited opportunities is based upon community contact comments and research done to develop performance context information. Qualified investments for all AAs totaled \$1.85 million in current investments, \$1 million in prior period investments, and \$950,000 in unfunded commitments. None of the bank's investments were considered innovative or complex.

Current period investments primarily consist of \$1 million invested in the Kansas Equity Fund IV and \$617,000 invested in the Federal Home Loan Mortgage Corp. (FHLMC) Pool of loans located in the bank's AAs. This represents a shift in the bank's investment philosophy. At the prior examination, investments were predominantly concentrated in one general obligation bond used to finance infrastructure in the Great-Bend AA. Additionally, the bank made one large investment in a mental health facility located in a limited scope AA. Under the new philosophy the bank is targeting affordable housing activities, which has been identified as a primary need within the communities the bank serves. Through participation in the Kansas Equity Fund IV, the funds invested by the bank are leveraged by the recipient through the use of low income housing tax credit programs. This allows the bank to support more projects than it could through direct financing of affordable housing projects.

Total current investments also include \$102,000 in donations to charitable organizations.

In the Salina/Abilene AA, the bank made 24 qualified investments (including donations) totaling \$895,000 during the current evaluation period. The bank also has two investments with an outstanding balance of \$174,000 from the prior period evaluation. In the Russell/Great Bend AA, the bank has 14 qualified investments totaling \$354,000. There were no prior period investments. A discussion of the full-scope AAs qualified investments is as follows:

- Investments in the Salina/Abilene AA primarily consist of \$563,000 invested in the Kansas Equity Fund IV. Other investments include \$230,000 in mortgage backed securities and \$102,000 in the KDFFA Beginning Farmer's Loan Program. The level and type of investments show strong responsiveness to community development needs.
- Investments in the Russell/Great Bend AA include \$222,000 invested in the Kansas Equity Fund IV, \$900,000 in a school bond, and \$42,000 in mortgage backed securities. These investments support affordable housing, demonstrating responsiveness to community development needs.
- UMBNBA contributed \$71,000 to 21 charitable organizations in the Salina/Abilene AA and \$8,000 to 11 charitable organizations in the Russell/Great Bend AA. These organizations assist with small business development, economic revitalization efforts, financial literacy programs, and community and social services targeted to low- and moderate-income individuals.
- Unfunded commitments to the Kansas Equity Fund VI allocated to the Salina/Abilene and Russell/Great Bend AAs are \$535,000 and \$210,000, respectively. This demonstrates an ongoing commitment to support affordable housing needs within the communities served by the bank. At the last examination, the bank did not report any unfunded commitments.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in both the Concordia AA and Manhattan AA is not inconsistent with the bank's overall "High Satisfactory" Investment Test rating. In the Concordia AA qualified investments totaled \$1.1 million, including prior period investments of \$848,000 in a mental health facility. The current period investments include \$133,000 invested in Kansas Development Beginning Farmer Loan Program and \$98,000 in the Kansas Equity Fund IV. In the Manhattan AA qualified investment total \$594,000. This total consists of \$346,000 invested in the FHLMC Pool and \$229,000 invested in the Kansas Equity Fund IV. These activities are discussed above with the full-scope review conclusions.

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 "High Satisfactory." Based on full-scope reviews, the bank's performance in the Russell/Great Bend and Salina/Abilene AAs is very good.

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.

UMBNBA's delivery systems are accessible to geographies and individuals of different income levels throughout the AA. UMBNBA operates three offices in the Russell/Great Bend AA. All offices are located in middle-income tracts. There are no low-, two moderate-, and ten upper-income tracts in this AA. Two offices were sold to another financial institution during the evaluation period, one each in a moderate- and upper-income tract. Fourteen percent of the AA population resides in the moderate-income tracts and 86 percent reside in the middle-income tracts. Approximately 18 percent of low- and moderate-income families reside in the moderate-income geographies.

The bank operates three offices in the Salina/Abilene AA. Two offices are located in middle-income tracts and one operates in an upper-income tract. There are no low-, one moderate-, thirteen middle-, and four upper-income tracts in the AA. The bank has not opened or closed any offices in the AA during the evaluation period. Approximately 4 percent of the AA's population resides in the moderate-income tract, 73 percent reside in middle-income tracts, and 23 percent reside in upper-income tracts. Geographic distribution of low- and moderate-income families in the AA shows 7 percent in moderate-, 81 percent in middle-, and 12 percent in upper-income tracts.

Business hours and services offered are reasonable and do not vary in a way that inconveniences the population. Offices in the Russell/Great Bend AA are open five days a week with extended lobby hours on Friday. One Great Bend office also provides drive-up services. All offices in the AA are willing to make special arrangements to meet with customers in the evening or by appointment.

In the Salina/Abilene AA, all offices are open five days a week with additional Saturday hours at one Salina office. Drive-up service is available six days a week at all three locations. All offices in the AA are willing to make special arrangements to meet with customers in the evening or by appointment.

Deposit services and loan product information can be obtained at each branch and through the bank's internet site. Product and service availability does not vary among the bank's AAs. UMBNBA offers one free, no minimum balance checking account available to all customers. Additionally, the bank offers a low-cost account to customers receiving periodic payments from

the Federal government. Although account holders do not have check writing privileges with this account, unlimited withdrawals are permitted in person or through the Ultra ATM card. The bank also offers three other types of free checking account products with varying minimum balance requirements. One product is focused on customers with investments; another is a money market sweep account; and, the third is available to all customers. Fees charged are the same in the different markets and AAs.

The locations of bank ATMs in both AAs are reasonably accessible to individuals of different income levels. UMBNBA operates two ATMs in the Russell/Great Bend AA located at branch offices in middle-income tracts. Both ATMs have 24-hour access and accept deposits.

Three ATMs are operated in the Salina/Abilene AA; two branches have 24-hour ATMS that accept deposits. The bank operates an additional ATM that has 24-hour access but does not accept deposits. One ATM is located in the moderate-income tract and two are located in middle-income tracts. A deposit taking ATM is located in the moderate-income tract.

Other alternative delivery systems include a 24-hour telephone service, Internet banking, and access to funds under the Temporary Aid to Needy Families (TANF) program. The telephone banking service allows customers to access account balances, review checks cleared and loan information, and transfer funds between accounts. The Internet banking service offers similar features. In addition, the Internet banking service accepts online loan applications and processes bill payment requests. Funds provided through the TANF program are accessed through an ATM card issued by the State. The State issues these cards to recipients who have not arranged for direct deposit of their funds. UMBNBA has accepted the card since 1997.

The telephone service and Internet banking, as alternate delivery systems, did not influence service test performance. The bank could not demonstrate the impact of these systems in low- and moderate-income geographies or the use of these systems by low- and moderate-income individuals.

Community Development Services

UMBNBA provided a relatively high level of community development services in the Russell/Great Bend and Salina/Abilene AAs. Bank officers and staff participate in a variety of organizations that primarily benefit low- and moderate-income individuals or distressed and underserved geographies, and help to promote economic development. In the Salina/Abilene AA 11 officers provided their financial expertise to 15 different community development organizations. In the Russell/Great Bend AA, five officers provided expertise to four organizations. Officer activities included involvement with economic development corporations that finance small business activities, financial education seminars, housing authorities, at-risk youth services, and charitable organizations serving low- and moderate-income individuals and families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in both the Concordia AA and Manhattan AA is not inconsistent with the bank's overall "High Satisfactory" Service Test performance.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/2002 to 12/31/2005) Investment and Service Tests and CD Loans: (07/23/2002 to 06/19/2006)	
Financial Institution	Products Reviewed	
UMB National Bank of America (UMBNA) Salina, Kansas	<ul style="list-style-type: none"> • Home Mortgage, Small Business, Small Farm, and Community Development Loans; • Qualified Investments • Retail and Community Development Services 	
Affiliate(s)	Affiliate Relationship	Products Reviewed
UMB Financial Corporation (UMBFC) UMB Bank, n.a. (UMB)	Holding Company Subsidiary of UMBFC	<ul style="list-style-type: none"> • Qualified Investments • Qualified Investments and Community Development Services
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Russell/Great Bend Salina/Abilene Concordia Manhattan	Full-Scope Full-Scope Limited-Scope Limited-Scope	

Appendix B: Market Profiles for Full-Scope Areas

Russell/Great Bend Assessment Area

Demographic Information for Full Scope Area: UMB Russell 2004/5						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	12	0.00	16.67	83.33	0.00	0.00
Population by Geography	40,364	0.00	13.87	86.13	0.00	0.00
Owner-Occupied Housing by Geography	12,181	0.00	14.22	85.78	0.00	0.00
Business by Geography	3,898	0.00	9.18	90.82	0.00	0.00
Farms by Geography	623	0.00	3.69	96.31	0.00	0.00
Family Distribution by Income Level	10,930	20.35	21.33	25.21	33.12	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	4,555	0.00	17.76	82.24	0.00	0.00
Median Family Income HUD Adjusted Median Family Income for 2005 Households Below Poverty Level		41,637 47,550 13%	Median Housing Value Unemployment Rate		60,009 2.25%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2005 HUD updated MFI

The Russell/Great Bend AA is located in the center of Kansas and is comprised of Barton, Russell, and Stafford counties. There are no low- and two moderate-income tracts in the AA. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

UMB NBA currently operates three bank offices and two ATMs in the AA. One office is located in Great Bend, and one each in the cities of Hudson and Luray. During the assessment period the bank sold two branches, both located in Great Bend, to another financial institution. One of the branches sold was located in a moderate-income census tract. In this AA, the primary business focus is agricultural lending. The bank's deposit base in this AA is 22 percent. Lending in the AA represents 44 percent of the bank's reported loans. The bank ranked third in deposit market share, as of June 30, 2005, with 9 percent of the area deposits. A total of 16 other financial institutions operate 34 banking offices in the AA. Primary competitors include Farmers Bank and Trust N.A., Sunflower Bank N.A., American State Bank and Trust, and Bank of America.

Economic conditions in the AA are stable. The economy is dependent on agriculture and many of the area industries are agricultural related. Major employers are local school districts, health care facilities, and local government. The unemployment rate of 2.25 percent is lower than the state rate of 5.5 percent and national rate of 6.9 percent.

Salina/Abilene Assessment Area

Demographic Information for Full Scope Area: UMB Salina 2004/5						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	18	0.00	5.56	72.22	22.22	0.00
Population by Geography	72,941	0.00	3.41	73.41	23.18	0.00
Owner-Occupied Housing by Geography	20,711	0.00	2.59	70.90	26.51	0.00
Business by Geography	5,688	0.00	5.85	73.80	20.34	0.00
Farms by Geography	535	0.00	1.12	78.50	20.37	0.00
Family Distribution by Income Level	19,797	14.44	17.77	26.01	41.78	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	6,376	0.00	7.12	80.52	12.36	0.00
Median Family Income HUD Adjusted Median Family Income for 2005 Households Below Poverty Level		41,637 47,550 9%	Median Housing Value Unemployment Rate		60,009 2.25%	

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

Source: 2000 US Census and 2005 HUD updated MFI

The Salina/Abilene AA is located in north central Kansas and consists of Saline and Dickinson counties. There are no low- and only one moderate-income tract in this AA. The moderate-income tract is located in the City of Salina. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

UMB NBA operates three bank offices and three ATMs in the AA. Two offices are located in Salina, and the third is located in Abilene. In this AA, the primary business focus is commercial lending. The bank's deposit base in this AA is 56 percent. Lending in the AA represents 33 percent of the bank's reported loans. The bank ranked first in deposit market share, as of June 30, 2005, with 16 percent of the area deposits. A total of 15 other financial institutions operate 36 banking offices in the AA. Primary competitors include Capital Federal Savings Bank, Sunflower Bank N.A., and Security Savings Bank.

Economic conditions in the AA are stable. The area unemployment rate of 2.25 percent is lower than the state rate of 5.5 percent and national rate of 6.9 percent. Salina is a regional center for agriculture, commerce, and health services. Major employers in the Salina area are Tony's Pizza, Great Plains Manufacturing, Exide Battery, Phillips Lighting, and Raytheon Aircraft. In Abilene, the major employer is Russell Stover Candies. The primary industry in Abilene is tourism. Abilene is home to the Dwight D. Eisenhower Presidential Library and Museum.

We performed one community contact in this AA. The contact stated the primary credit need in this AA is affordable housing. Agricultural-related financing is also needed as the area remains strongly connected to the farming industry.

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.

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. When such loans exist, insert a line item with the appropriate caption in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column with the appropriate caption, such as: “Statewide/Regional,” “Statewide/Regional with potential benefit to one or more AAs” or “Out of Assessment Area.” “Out of Assessment Area” is used ONLY if the bank has otherwise adequately met the CD lending needs of its assessment area.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm.

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

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

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of the Assessment Area" is used ONLY if the bank has otherwise adequately met the qualified investment needs of its assessment area.

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

Institution ID: 4945

Table 1. Lending Volume

LENDING VOLUME		Geography: KANSAS				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005						
MA/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:												
Russell/Great Bend	43.55	81	2,636	241	7,654	562	25,187	4	11,000	888	46,477	22.16
Salina/Abilene	33.35	115	7,962	251	40,277	311	28,533	13	22,559	690	99,331	56.28
Limited Review:												
Concordia	9.26	27	694	52	4,520	109	3,737	3	25,515	191	34,466	9.81
Manhattan	13.84	62	4,359	158	7,362	61	3,474	0	0	281	15,195	11.75

* Loan Data as of December 31, 2005. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 23, 2002 to June 19, 2006.

*** Deposit Data as of June 30, 2005. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: 4945

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: KANSAS				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***						
Full Review:																
Russell/Great Bend	27	32.53	0.00	0.00	14.22	0.00	85.78	100.00	0.00	0.00	2.69	0.00	0.00	3.15	0.00	
Salina/Abilene	27	32.53	0.00	0.00	2.59	0.00	70.90	66.67	26.51	33.33	1.14	0.00	0.00	1.25	0.94	
Limited Review:																
Concordia	10	12.05	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	9.09	0.00	0.00	9.09	0.00	
Manhattan	19	22.89	0.00	0.00	2.74	0.00	50.63	78.95	46.63	21.05	0.53	0.00	0.00	0.88	0.17	

* Based on 2004 Peer Mortgage Data (Western)

** 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)

Institution ID: 4945

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: KANSAS						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% Bank Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Russell/Great Bend	15	23.08	0.00	0.00	14.22	20.00	85.78	80.00	0.00	0.00	8.77	0.00	15.38	7.92	0.00
Salina/Abilene	29	44.62	0.00	0.00	2.59	10.34	70.90	68.97	26.51	20.69	2.78	0.00	9.52	2.17	3.48
Limited Review:															
Concordia	9	13.85	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	25.00	0.00	0.00	25.00	0.00
Manhattan	12	18.46	0.00	0.00	2.74	8.33	50.63	66.67	46.63	25.00	5.30	0.00	16.67	7.94	1.59

* Based on 2004 Peer Mortgage Data (Western)

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

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

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

Institution ID: 4945

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: KANSAS								Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% Owner Occ Units****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Russell/Great Bend	39	28.68	0.00	0.00	14.22	5.13	85.78	94.87	0.00	0.00	3.26	0.00	2.60	3.37	0.00
Salina/Abilene	58	42.65	0.00	0.00	2.59	0.00	70.90	91.38	26.51	8.62	2.09	0.00	0.00	2.63	0.81
Limited Review:															
Concordia	8	5.88	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	3.09	0.00	0.00	3.09	0.00
Manhattan	31	22.79	0.00	0.00	2.74	12.90	50.63	58.06	46.63	29.03	1.37	0.00	5.56	1.60	0.84

* Based on 2004 Peer Mortgage Data (Western)

** 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)

Institution ID: 4945

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: KANSAS				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005					Market Share (%) by Geography				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% of MF Units****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Russell/Great Bend	0	0.00	0.00	0.00	2.52	0.00	97.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Salina/Abilene	1	100.00	0.00	0.00	1.05	0.00	66.42	0.00	32.53	100.00	20.00	0.00	0.00	0.00	33.33	
Limited Review:																
Concordia	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Manhattan	0	0.00	0.00	0.00	13.90	0.00	60.81	0.00	25.29	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2004 Peer Mortgage Data (Western)

** 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.

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Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: KANSAS				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005				
MA/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 ^{***}	% BANK Loans	% of Business ^{***}	% BANK Loans	% of Business ^{***}	% BANK Loans	% of Business ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Russell/Great Bend	241	34.63	0.00	0.00	9.18	1.24	90.82	98.76	0.00	0.00	8.13	0.00	2.17	9.31	0.00					
Salina/Abilene	245	35.20	0.00	0.00	5.85	6.53	73.80	73.47	20.34	20.00	6.25	0.00	8.82	6.04	7.16					
Limited Review:																				
Concordia	52	7.47	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	13.49	0.00	0.00	14.08	0.00					
Manhattan	158	22.70	0.00	0.00	17.14	12.66	46.24	49.37	36.62	37.97	3.90	0.00	4.14	3.65	4.37					

* Based on 2004 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 (2004).

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Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: KANSAS		Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005			
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography						
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp		
Full Review:																	
Russell/Great Bend	560	54.00	0.00	0.00	3.69	0.36	96.31	99.64	0.00	0.00	41.41	0.00	10.00	42.47	0.00		
Salina/Abilene	308	29.70	0.00	0.00	1.12	1.30	78.50	82.47	20.37	16.23	23.79	0.00	100.00	22.05	33.33		
Limited Review:																	
Concordia	109	10.51	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	70.10	0.00	0.00	70.10	0.00		
Manhattan	60	5.79	0.00	0.00	5.04	1.67	46.52	36.67	48.44	61.67	19.57	0.00	0.00	12.05	31.48		

* Based on 2004 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 (2004).

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Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: KANSAS				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005					Market Share				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families	% BANK Loans**	% Families	% BANK Loans****	% Families	% BANK Loans****	% Families	% BANK Loans****						
Full Review:																
Russell/Great Bend	27	32.53	20.35	22.22	21.33	25.93	25.21	18.52	33.12	33.33	3.58	2.08	3.75	1.19	6.32	
Salina/Abilene	27	32.53	14.44	0.00	17.77	18.52	26.01	14.81	41.78	66.67	1.51	0.00	1.44	0.69	2.65	
Limited Review:																
Concordia	10	12.05	17.76	20.00	23.13	40.00	25.27	0.00	33.84	40.00	10.94	14.29	17.39	0.00	14.29	
Manhattan	19	22.89	16.61	5.26	17.26	15.79	22.72	52.63	43.41	26.32	0.73	2.33	0.72	1.24	0.37	

* Based on 2004 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

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

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

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Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: KANSAS						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families	% BANK Loans	% Families	% BANK Loans	% Families	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Russell/Great Bend	15	23.08	20.35	13.33	21.33	33.33	25.21	26.67	33.12	26.67	9.26	18.18	8.33	11.11	6.52
Salina/Abilene	29	44.62	14.44	6.90	17.77	24.14	26.01	37.93	41.78	31.03	6.76	5.88	11.43	8.62	4.12
Limited Review:															
Concordia	9	13.85	17.76	33.33	23.13	33.33	25.27	22.22	33.84	11.11	27.27	50.00	33.33	50.00	10.00
Manhattan	12	18.46	16.61	8.33	17.26	25.00	22.72	33.33	43.41	33.33	5.88	0.00	18.75	7.69	2.78

^{*} Based on 2004 Peer Mortgage Data (Western)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

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

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

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Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: KANSAS						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Russell/Great Bend	39	28.68	20.35	12.82	21.33	28.21	25.21	15.38	33.12	43.59	4.25	6.98	8.64	0.77	4.11
Salina/Abilene	58	42.65	14.44	1.72	17.77	15.52	26.01	25.86	41.78	56.90	2.69	0.00	2.86	2.31	3.29
Limited Review:															
Concordia	8	5.88	17.76	0.00	23.13	50.00	25.27	37.50	33.84	12.50	3.80	0.00	18.18	3.70	0.00
Manhattan	31	22.79	16.61	6.45	17.26	32.26	22.72	16.13	43.41	45.16	1.96	2.33	2.40	1.26	2.09

* Based on 2004 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

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

**** 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.

Institution ID: 4945

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: KANSAS			Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Russell/Great Bend	241	34.63	59.52	95.02	94.61	4.56	0.83	8.13	14.81	
Salina/Abilene	245	35.20	56.66	75.51	76.33	11.84	11.84	6.25	12.69	
Limited Review:										
Concordia	52	7.47	51.90	94.23	84.62	3.85	11.54	13.49	27.00	
Manhattan	158	22.70	58.32	86.71	92.41	2.53	5.06	3.90	7.63	

* Based on 2004 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 - 2004).

**** 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 3.88% of small loans to businesses originated and purchased by the bank.

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Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: KANSAS			Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Russell/Great Bend	560	54.00	94.86	98.75	90.36	8.39	1.25	41.41	45.44
Saline/Abilane	308	29.70	93.27	94.81	77.27	16.56	6.17	23.79	26.20
Limited Review:									
Concordia	109	10.51	95.70	100.00	92.66	7.34	0.00	70.10	70.83
Manhattan	60	5.79	91.85	88.33	93.33	5.00	1.67	19.57	20.16

* Based on 2004 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 - 2004).

**** 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 1.93% of small loans to farms originated and purchased by the bank.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: KANSAS				Evaluation Period: JULY 23, 2002 TO JULY 19, 2006			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Russell/Great Bend	0	0	14	362	14	362	12.19	1	535
Salina/Abilene	2	174	24	966	26	1,140	38.38	1	211
Limited Review:									
Concordia	3	848	6	138	9	986	33.20	1	93
Manhattan	0	0	7	482	7	482	16.23	1	112

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS TO JULY 19, 2006								Geography: KANSAS				Evaluation Period: JULY 23, 2002					
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:																	
Russell/Great Bend	22.16	3	37.50	0.00	0.00	100.00	0.00	0	2	0	-1	-1	0	0.00	13.87	86.13	0.00
Salina/Abilene	56.28	3	37.50	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0.00	3.41	73.41	23.18
Limited Review:																	
Concordia	9.81	0	0.00	0.00	0.00	0.00	0.00	0	3	0	0	- 3	0	0.00	0.00	100.00	0.00
Manhattan	11.75	2	25.00	0.00	50.00	50.00	0.00	1	1	0	0	+1	-1	0.00	15.31	51.48	33.21

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Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System				Geography: KANSAS				Evaluation Period: JULY 23, 2002 TO JULY 19, 2006									
MA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Russell/Great Bend	22.16	3	37.50	0	0	100.00	0	1	14.28	0	0	100.00	0	0.00	13.87	86.13	0.00
Salina/Abilene	56.28	3	37.50	0	0	66.67	33.33	3	42.86	0	0	66.67	33.33	0.00	3.41	73.41	23.18
Limited Review:																	
Concordia	9.81	0	0.00	0	0	0	0	0	0.00	0	0	0	0	0.00	0.00	100.00	0.00
Manhattan	11.75	2	25.00	0	50.00	50.00	0	3	42.86	0	33.33	66.67	0	0.00	15.31	51.48	33.21