



## STRATEGIC PLAN

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Comptroller of the Currency  
Administrator of National Banks

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### **PUBLIC DISCLOSURE**

**April 23, 2001**

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**Bank Midwest, National Association  
Charter Number 22015**

**1100 Main Street  
Kansas City, MO 64105**

**Comptroller of the Currency  
ADC Dan L. Gipple-Kansas City South Field Office  
6700 Antioch Road Suite 450  
Merriam, KS 66204**

**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, nor should it 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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# INSTITUTION

***INSTITUTION'S CRA RATING:*** This institution is rated “Satisfactory.”

Bank Midwest, N.A. was evaluated under the Community Reinvestment Act strategic plan option. BMW is rated “satisfactory” because the bank met its performance goals for years two, three, and four of its five-year strategic plan approved by the OCC on March 3, 1997. For years two, three, and four, the bank achieved total points of 87.93, 94.84, and 91.15. The plan indicates a satisfactory score equals 85 to 100 points.

Loan types are scored based upon the point schedule found in the “Strategic Plan Scoring System.” These loan types consist of small business and farm, consumer, home equity, Home Mortgage Disclosure Act (HMDA), and community development loans. Points are awarded for meeting goals based on both the dollar amount and number of loans originated in each assessment area for various categories. Specific categories include total loans, loans made to low- and moderate-income applicants, and loans made in low- and moderate-income tracts.

Investment goals are based on the dollar amount of investment established for each assessment area. A “bonus point” is awarded for loan and investment goals that are exceeded by 5 percent. Points are awarded under the service test based on the accessibility of delivery systems, changes in branch locations, reasonableness of business hours and services, and meeting community development service goals. Bonus points are awarded if services are added that benefit low- and moderate-income areas or households.

To receive points, the bank must meet at least 60 percent of goals. Final scores are determined by multiplying each assessment area score by its percentage share of total deposits. Resulting scores are added together and applied to BMW’s scoring system to determine the overall rating. The percentage allocations for assessment area scores are adjusted annually based on the percentage of deposits, for the respective region, as of December 31 of the preceding year.

## **DESCRIPTION OF INSTITUTION:**

Bank Midwest, N.A. (BMW) is headquartered in Kansas City, Missouri with total assets of \$2.3 billion as of December 31, 2000. BMW is an interstate bank with 66 branch locations throughout the Kansas City metropolitan area, Northern Missouri, and Northeast Kansas. The bank is a subsidiary of a \$3.2 billion multi-bank holding company, Dickinson Financial Corporation, which is also based in Kansas City, Missouri.

During our evaluation period, BMW acquired eighteen branches in assessment areas covered by the plan. Specific information by region is as follows:

<b>Assessment Area</b>	<b># of branches</b>	<b>Branch information</b>
Kansas City Region	11	6 were purchased from other institutions 3 are in Wal-Mart locations 2 are new bank locations
Northeast Region	2	1 is in a Wal-Mart location 1 was purchased from another institution
Northwest Region	2	both were purchased from other institutions
St. Joseph Region	3	1 is a new bank location 1 is in a Wal-Mart location 1 was a branch relocation

In the Kansas City region, the bank added Clay and Cass counties, which are not part of the original strategic plan. However, these counties are part of the Kansas City MSA. In the Northeast region, BMW added Saline County, and DeKalb and Holt counties were added in the Northwest region. These are in non-metropolitan areas of Northeast and Northwest Missouri. In the St. Joseph region, the bank added Atchison County, Kansas, which is a non-metropolitan area. The County is contiguous with the St. Joseph MSA and does not extend substantially beyond the boundary of the State of Missouri.

In November 2000, the bank purchased an institution in Green County, Missouri, which is not part of the strategic plan assessment areas. We did not review the bank's performance in Green County due to the limited time it has been part of the bank.

At the last CRA examination dated April 27, 1998, BMW was rated "Satisfactory."

#### **CONCLUSIONS:**

The information in this section is presented in a manner consistent with the format contained in the bank's approved CRA strategic plan. A copy of the current strategic plan is available upon request from the bank.

The following tables represent how the bank achieved the total scores for 1998, 1999 and 2000 strategic plan years.

**1998 PERFORMANCE:**

ASSESSMENT AREAS	TOTAL LENDING TEST SCORE	TOTAL INVESTMENT TEST SCORE	TOTAL SERVICE TEST SCORE	TOTAL SCORE	ALLOCATION PERCENTAGE	TOTAL SCORE
KANSAS CITY	51.9	16	15	82.9	44.2%	36.64
NORTHEAST	69.9	13.5	15	98.4	27.41%	26.97
NORTHWEST	67.7	0	15	82.7	19.97%	16.52
ST. JOSEPH	65	16	15	96	8.42%	8.08
<b>TOTAL 1998 SCORE</b>						<b>88.21</b>

**1999 PERFORMANCE:**

ASSESSMENT AREAS	TOTAL LENDING TEST SCORE	TOTAL INVESTMENT TEST SCORE	TOTAL SERVICE TEST SCORE	TOTAL SCORE	ALLOCATION PERCENTAGE	TOTAL SCORE
KANSAS CITY	62.5	16	15	93.5	44.43%	41.54
NORTHEAST	71.1	16	15	102.1	27.05%	27.62
NORTHWEST	55.7	16	15	86.7	19.87%	17.23
ST. JOSEPH	66.7	16	15	97.7	8.65%	8.45
<b>TOTAL 1999 SCORE</b>						<b>94.84</b>

**2000 PERFORMANCE:**

ASSESSMENT AREAS	TOTAL LENDING TEST SCORE	TOTAL INVESTMENT TEST SCORE	TOTAL SERVICE TEST SCORE	TOTAL SCORE	ALLOCATION PERCENTAGE	TOTAL SCORE
KANSAS CITY	53.6	16	16.5	86.1	46.28%	39.85
NORTHEAST	66.7	16	15	97.7	28.72%	28.06
NORTHWEST	67.5	16	15	98.5	17%	16.75
ST. JOSEPH	66.1	0	15	81.1	8%	6.49
<b>TOTAL 2000 SCORE</b>						<b>91.15</b>

**Fair Lending**

An analysis of three years of public comments and consumer complaint information, HMDA, small business, and small farm lending data was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed in January 1998.

# MULTISTATE METROPOLITAN AREA

## ***CRA RATING FOR KANSAS CITY, MISSOURI-KANSAS MSA: SATISFACTORY***

The following table represents the bank's total score for the Kansas City region if the deposit allocation percentages are not considered. An average of the total points for each strategic plan year represents overall performance for the entire evaluation period.

1998	1999	2000	TOTAL	AVERAGE
82.9	93.5	86.1	262.5	87.5

BMW's plan does not address specific goals by assessment area. However, based on points allocated to the Kansas City region, the average score of 87.5 is within the bank's satisfactory rating category.

The following table combines loan goals for plan years two, three, and four. BMW's performance for the three years combined is compared to these goals. All goals are not shown. Instead, key areas of performance are highlighted.

### **PERFORMANCE IN THE KANSAS CITY REGION:**

STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE FOR JACKSON, PLATTE, RAY, CLAY, CASS, LAFAYETTE, CLINTON, JOHNSON, AND WYANDOTTE COUNTIES IN THE KANSAS CITY MSA TO OBTAIN SATISFACTORY RATING		
LOAN PRODUCTS	STRATEGIC PLAN GOAL*	ACTUAL PERFORMANCE
<b>Small business/farm loans</b>	71 loans in low-income tracts	19 loans in low-income tracts
	177 loans in moderate-income tracts.	255 loans in moderate-income tracts
<b>Consumer Secured and Unsecured loans</b>	965 loans to low-income applicants	851 loans to low-income applicants
	799 loans to moderate-income applicants	914 loans to moderate-income applicants
	184 loans in low-income tracts	97 loans in low-income tracts
	1,099 loans in moderate-income tracts	1,072 loans in moderate-income tracts
<b>HMDA loans</b>	174 loans to low-income applicants	189 loans to low-income applicants
	152 loans to moderate-income applicants	291 loans to moderate-income applicants
	36 loans in low-income tracts	34 loans in low-income tracts
	169 loans in moderate-income tracts	350 loans in moderate-income tracts
<b>Community Development loans</b>	\$165 total dollar amount**	\$330 total dollar amount**
<b>Investments</b>	\$107 total dollar amount per year**	\$771, \$174, and \$118 total dollar amount in 1998, 1999, and 2000, respectively**
<b>Services</b>	21 organizations served per year	24, 32, and 30 organizations served in 1998, 1999, and 2000, respectively

\*\*Dollar amounts in thousands

In the Kansas City region, the bank met a substantial majority of its lending goals for unsecured consumer, HMDA, home equity, and community development loans. Performance in meeting a majority of small business/small farm loan goals is poor. However, the number of loans originated in moderate-income tracts exceeds stated goals in 1999 and 2000. Performance in meeting consumer secured loans goals is adequate. BMW exceeded all investment goals and service goals for the number of organizations served.

The bank's assessment areas are smaller than the boundaries of the multi-state metropolitan area. We reviewed the bank's performance in all assessment areas located in the metropolitan area, which included the following counties: Jackson, Platte, Ray, Clay, Cass, Lafayette, Clinton, Johnson and Wyandotte.

## STATE

### ***CRA RATING FOR MISSOURI: SATISFACTORY***

The major factors that support this rating include:

- Average scores for the Northeast, Northwest, and St. Joseph regions are within the bank's satisfactory rating category.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE IN MISSOURI:**

Performance in the Northeast region is satisfactory. The average total score for years 1998, 1999, and 2000 is 99.4, which is within the bank's satisfactory rating category. The bank met a substantial majority of its lending goals for small business/small farm, unsecured consumer, home equity, and community development loans. Regarding HMDA loans, 1998 and 1999 goals were substantially met and performance in 2000 is adequate. For secured consumer loans, performance in 1999 and 2000 is adequate, however, BMW only met 55 percent of its goal for 1998. BMW exceeded 1999 and 2000 investment goals, while substantially meeting the 1998 investment goal. Service goals for 1998 and 2000 were exceeded regarding the number of organizations served, and the bank met the 2000 goal.

Performance in the Northwest region is satisfactory. The average total score for years 1998, 1999, and 2000 is 89.3, which is within the bank's satisfactory rating category. BMW substantially met all dollar volume goals for small business/small farm loans. The bank exceeded its 1998 goals for unsecured consumer loans to moderate-income applicants by dollar volume. Regarding HMDA loan goals, actual performance exceeded goals in 1998 and 1999. In 2000, BMW exceeded all HMDA loan goals except for the number of loans to moderate-income applicants, which was substantially met. The bank significantly exceeded investment goals in 1999 and 2000. Service goals for the number of organizations served were exceeded in 1998 and met in 1999 and 2000.

Performance in the St. Joseph region is satisfactory. The average total score for 1998, 1999, and 2000 is 91.5, which is within the bank's satisfactory rating category. BMW exceeded its small business/small farm loan goal by dollar amount in 1998 and substantially met dollar volume goals for years 1999 and 2000. For secured consumer loans, goals for loans to moderate-income applicants were exceeded by dollar volume in both 1999 and 2000. This goal was also exceeded by number of loans in 2000. BMW exceeded 1998 goals for unsecured consumer loans by both number and dollar volume for loans to moderate-income applicants. HMDA loan performance is good compared to stated goals.



## ASSESSMENT AREA

The following table represents the bank's total score for the Northeast region if the deposit allocation percentages are not considered. An average of the total points for each strategic plan year represents overall performance for the entire evaluation period.

1998	1999	2000	TOTAL	AVERAGE
98.4	102.1	97.7	298.2	99.4

BMW's plan does not address specific goals by assessment area. However, based on points allocated to the Northeast region, the average score of 99.4 is within the bank's satisfactory rating category.

The following table combines loan goals for plan years two, three, and four. BMW's performance for the three years combined is compared to these goals. All goals are not shown. Instead, key areas of performance are highlighted.

### PERFORMANCE IN THE NORTHEAST REGION:

<b>STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE            FOR ADAIR, CARROLL, LINN, LIVINGSTON, MACON, PUTNAM, RANDOLPH, SCHUYLER, SHELBY, SULLIVAN,            AND SALINE COUNTIES IN MISSOURI            TO OBTAIN SATISFACTORY RATING</b>		
<b>LOAN PRODUCTS</b>	<b>STRATEGIC PLAN GOAL*</b>	<b>ACTUAL PERFORMANCE</b>
<b>Small business/farm loans</b>	41 loans in moderate-income tracts.	85 loans in moderate-income tracts
<b>Consumer Secured and Unsecured loans</b>	843 loans to low-income applicants 708 loans to moderate-income applicants 180 loans in moderate-income tracts	490 loans to low-income applicants 578 loans to moderate-income applicants 180 loans in moderate-income tracts
<b>HMDA loans</b>	93 loans to low-income applicants 204 loans to moderate-income applicants 71 loans in moderate-income tracts	115 loans to low-income applicants 227 loans to moderate-income applicants 95 loans in moderate-income tracts
<b>Community Development loans</b>	\$136 total dollar amount**	\$607 total dollar amount**
<b>Investments</b>	\$71 total dollar amount for each year**	\$69, \$92, and \$117 total dollar amount for years 1998, 1999, and 2000**
<b>Services</b>	8 organizations served per year	10, 9, and 8 organizations served in 1998, 1999, and 2000, respectively

\*\*Dollar amounts in thousands

There are no low-income tracts in the Northeast region

## ASSESSMENT AREA

The following table represents the bank's total score for the Northwest region if the deposit allocation percentages are not considered. An average of the total points for each strategic plan year represents overall performance for the entire evaluation period.

<b>1998</b>	<b>1999</b>	<b>2000</b>	<b>TOTAL</b>	<b>AVERAGE</b>
82.7	86.7	98.5	267.9	89.3

BMW's plan does not address specific goals by assessment area. However, based on points allocated to the Northwest region, the average score of 89.3 is within the bank's satisfactory rating category.

The following table combines loan goals for plan years two, three, and four. BMW's performance for the three years combined is compared to these goals. All goals are not shown. Instead, key areas of performance are highlighted.

**PERFORMANCE IN THE NORTHWEST REGION:**

<b>STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE FOR ATCHISON, GENTRY, HARRISON, NODAWAY, DEKALB, DAVIES, HOLT, CALDWELL, AND WORTH COUNTIES IN MISSOURI TO OBTAIN SATISFACTORY RATING</b>		
<b>LOAN PRODUCTS</b>	<b>STRATEGIC PLAN GOAL *</b>	<b>ACTUAL PERFORMANCE</b>
<b>Small business/farm loans</b>	\$125,811 total dollar amount** 5,309 loans	\$116,924 total dollar amount** 4,027 loans
<b>Consumer Secured and Unsecured loans</b>	744 loans to low-income applicants 709 loans to moderate-income applicants	393 loans to low-income applicants 497 loans to moderate-income applicants
<b>HMDA loans</b>	60 loans to low-income applicants 162 loans to moderate-income applicants	111 loans to low-income applicants 174 loans to moderate-income applicants
<b>Community Development loans</b>	\$132 total dollar amount**	\$2,047 total dollar amount**
<b>Investments</b>	\$67 total dollar amount for each year**	\$9, \$115, and \$184 total dollar amount for years 1998, 1999, and 2000**
<b>Services</b>	8 organizations served per year	10, 8, and 8 organizations served in 1998, 1999, and 2000, respectively

\*\*Dollar amounts in thousands

There are no low- or moderate-income tracts in the Northwest region

## ASSESSMENT AREA

The following table represents the bank's total score for the St. Joseph region if the deposit allocation percentages are not considered. An average of the total points for each strategic plan year represents overall performance for the entire evaluation period.

1998	1999	2000	TOTAL	AVERAGE
96	97.7	80.7	274.4	91.5

BMW's plan does not address specific goals by assessment area. However, based on points allocated to the St. Joseph region, the average score of 91.5 is within the bank's satisfactory rating category.

The following table combines loan goals for plan years two, three, and four. BMW's performance for the three years combined is compared to these goals. All goals are not shown. Instead, key areas of performance are highlighted.

### PERFORMANCE IN THE ST. JOSEPH REGION:

STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE FOR ANDREW AND BUCHANAN COUNTIES IN MISSOURI, AND ATCHISON COUNTY IN KANSAS TO OBTAIN SATISFACTORY RATING		
LOAN PRODUCTS	STRATEGIC PLAN GOAL *	ACTUAL PERFORMANCE
<b>Small business/farm loans</b>	6 loans in low-income tracts.	2 loans in low-income tracts
	6 loans in moderate-income tracts	8 loans in moderate-income tracts
<b>Consumer Secured and Unsecured loans</b>	152 loans to low-income applicants	127 loans to low-income applicants
	152 loans to moderate-income applicants	179 loans to moderate-income applicants
	6 loans in low-income tracts	14 loans in low-income tracts
	9 loans in moderate-income tracts	105 loans in moderate-income tracts
<b>HMDA loans</b>	37 loans to low-income applicants	77 loans to low-income applicants
	109 loans to moderate-income applicants	131 loans to moderate-income applicants
	17 loans in low-income tracts	11 loans in low-income tracts
	43 loans in moderate-income tracts	39 loans in moderate-income tracts
<b>Community Development loans</b>	\$83 total dollar amount**	\$135 total dollar amount**
<b>Investments</b>	\$60 total dollar amount for each year**	\$64, \$67, and \$5 total dollar amount for years 1998, 1999, and 2000**
<b>Services</b>	3 organizations served per year	6, 9, and 7 organizations served in 1998, 1999, and 2000, respectively

\*\*Dollar amounts in thousands

## SCOPE OF EXAMINATION

<b>SCOPE OF EXAMINATION</b> Evaluated the bank's performance in all assessment areas covered under the strategic plan for years 2, 3 and 4.			
<b>TIME PERIOD REVIEWED</b>		March 1, 1998 to February 28, 2001	
<b>FINANCIAL INSTITUTION</b>		Bank Midwest, National Association	<b>PRODUCTS REVIEWED</b> Small Business, small farm, consumer secured and unsecured, home equity, community development, and home mortgage loans.
<b>FINANCIAL INSTITUTION/ AFFILIATE</b>	<b>AFFILIATE RELATIONSHIP</b>		<b>PRODUCTS REVIEWED</b>
No affiliate performance was included in analyzing the bank's CRA performance.			
<b>LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION</b>			
<b>ASSESSMENT AREA</b>	<b>TYPE OF EXAMINATION</b>	<b>BRANCHES VISITED</b>	<b>OTHER INFORMATION</b>
Kansas City Region	Strategic Plan	One	Part of Kansas City, Missouri-Kansas MSA
Northeast Region	Strategic Plan	None	Non-metropolitan Area. Information reviewed from the Kansas City main bank.
Northwest Region	Strategic Plan	None	Non-metropolitan Area. Information reviewed from the Kansas City main bank.
St. Joseph Region	Strategic Plan	None	St. Joseph MSA and Atchison County, Kansas (non-metropolitan area). Information reviewed from the Kansas City main bank.
Green County, Missouri	None	None	Part of Springfield MSA. Bank was purchased in November 2000. Part of BMW for only a limited amount of time. Not part of the current strategic plan.

## APPENDIX B

**SUMMARY OF STATE AND MULTISTATE METROPOLITAN AREA RATINGS**

<b>State or Multistate Metropolitan area Name</b>	<b>State Rating</b>
Kansas City, Missouri-Kansas MSA	Satisfactory
Missouri	Satisfactory