

PUBLIC DISCLOSURE

January 24, 2005

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

GOLD BANK RSSD# 579252

11301 NALL AVENUE LEAWOOD, KANSAS, 66211

Federal Reserve Bank of Kansas City 925 Grand Boulevard Kansas City, Missouri 64198

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.

TABLE OF CONTENTS

Institu	tion Rating Institution's CRA Rating Table of Performance Test Ratings Summary of Major Factors Supporting Rating	3 3 3
Institu		4
	Description of Institution	5 6
Multis	tate Metropolitan Area	
	Multistate Metropolitan Area RatingScope of Examination	12 12
	Description of Operations Conclusions With Respect to Performance Tests	12 16
State	of Kansas	
	State Rating	22
	Scope of Examination Description of Operations	22 22
	Conclusions With Respect to Performance Tests	25
State	of Missouri	
	State Rating	29 29
	Scope of Examination Description of Operations	29
	Conclusions With Respect to Performance Tests	32
State	of Oklahoma	
	State Rating	36
	Scope of Examination	36 37
	Description of Operations	37
	Metropolitan Area (Full Review)	
	Description of Operations in MSA 5880 (Oklahoma City, OK)	40 43
	Metropolitan Area (Full Review)	
	Description of Operations in MSA 8560 (Tulsa, OK) Conclusions With Respect to Performance Tests	47 50
	NonMetropolitan Statewide Area (Limited Review)	54

LEAWOOD, KANSAS January 24,	2005
Appendices	
CRA Appendix A: Scope of Examination	55
CRA Appendix B: Summary of State and Multistate Metropolitan Area Ratings	57
CRA Appendix C: Glossary	58
CRA Appendix D: CRA Core Tables	

CRA Public Evaluation

GOLD BANK

INSTITUTION RATING

INSTITUTION'S CRA RATING: Gold Bank is rated "Satisfactory"

The following table indicates the performance level of <u>Gold Bank</u> with respect to the lending, investment, and service tests.

PERFORMANCE		GOLD BANK					
LEVELS	PEF	PERFORMANCE TESTS					
	Lending Test*	Investment Test	Service Test				
Outstanding							
High Satisfactory	Х	Х					
Low Satisfactory			Х				
Needs to Improve							
Substantial Noncompliance							

^{*} The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

Major factors supporting the institution's rating include:

- The volume of Home Mortgage Disclosure Act (HMDA), small business and small farm lending reflected good responsiveness to credit needs in the bank's assessment areas.
- The geographic distribution of lending was good.
- The distribution of lending among borrowers of different income levels and businesses of different sizes was good.
- The level of community development lending was adequate.
- The level of qualified community development investment activity was adequate.
- The bank's level of community development services reflected adequate responsiveness.
- The retail delivery systems were generally accessible to geographies and individuals of different income levels.

INSTITUTION

DESCRIPTION OF INSTITUTION

Gold Bank (Gold) is a \$4.2 billion financial institution headquartered in Leawood, Kansas, and wholly owned by Gold Banc Corporation, Inc. (GBCI), a publicly-traded financial holding company. During 2004, Gold Bank, Hennessey, Oklahoma, and Gold Bank, Bradenton, Florida were merged into the Gold operation, making it the sole bank owned by GBCI. The company's structure was also simplified by the divestitures of eleven branches in northeastern Kansas, two branches in eastern Kansas, and three branches in western Oklahoma. All of the divested branches were located in areas that are predominately rural in nature. Under the new structure, Gold operates 39 branches and 43 automated teller machines (ATMs) in Kansas, Missouri, Oklahoma, and Florida. This evaluation will not include a performance review of the eleven branches and ATMs located in Florida due to the relatively short duration of time since their merger, September 1, 2004, and due to requirements of Section 109 of the Interstate Banking and Branching Efficiency Act of 1994.

The bank has no financial or legal impediments that would prevent it from fulfilling its responsibilities under the Community Reinvestment Act (CRA). The bank received a satisfactory rating at the previous CRA evaluation conducted as of October 28, 2002.

The bank's delineated assessment areas comply with the requirements of the CRA and do not arbitrarily exclude low- or moderate-income (LMI) geographies. Under the CRA, a financial institution's performance is evaluated within the context of each state in which it operates, and each state is assigned a separate rating. The Kansas City multistate Metropolitan Statistical Area (MSA) assessment area also receives a separate rating. An overall rating is then assigned for the bank. Therefore, Gold's performance was evaluated and assigned a rating for the Kansas City multistate MSA and each state in which it operates a branch, including Kansas, Missouri, and Oklahoma, as well as for its overall performance. The states in which the bank operates encompass a total of six assessment areas based on 1999 MSA designations:

1. MULTISTATE ASSESSMENT AREA

 MSA 3760 (Kansas City MO-KS MSA), consisting of five of the 11 MSA counties for year 2003 including Johnson and Wyandotte Counties in the State of Kansas, and Clay, Jackson and Platte Counties in the State of Missouri

2. STATE OF KANSAS

 Rural Kansas Assessment Area, consisting of Cherokee and Crawford Counties

3. STATE OF MISSOURI

- MSA 7000 (St. Joseph), consisting of Andrew and Buchanan Counties
- 4. STATE OF OKLAHOMA (Oklahoma operations did not merge with Gold until 2004; accordingly, loans originated during 2003 will not be included in this evaluation)
 - MSA 5880 (Oklahoma City, OK), consisting of four of the six 2003 MSA counties including Canadian, Logan, Oklahoma, and Cleveland Counties
 - MSA 8560 (Tulsa, OK), consisting of the entire 2003 MSA including Creek, Osage, Rogers, Tulsa, and Wagoner Counties
 - Rural Oklahoma Assessment Area, consisting of Kingfisher and Garfield Counties

Gold offers a wide range of credit products within its assessment areas, including commercial and consumer deposit and credit products. The September 30, 2004 Consolidated Report of Condition and Income indicates that the bank is primarily a commercial lender. Commercial loans comprised 86.6 percent of the bank's total loan portfolio, followed by residential real estate at 9.5 percent, agricultural at 2.8 percent, consumer at 1.0 percent, and other loans at 0.1 percent. Please note, however, that a substantial majority of the bank's real estate lending consists of loans sold to investors on the secondary market and are not reflected in the bank's portfolio holdings.

SCOPE OF EXAMINATION

Gold's six assessment areas were reviewed using the Federal Financial Institutions Examination Council's *Interagency CRA Procedures for Large Institutions*. Loan products evaluated included home purchase, refinance, home improvement, small business, small farm, and other loans meeting the definition of community development lending under the CRA and its supplementary guidance. The mortgage loans included in this evaluation were reported under the Home Mortgage Disclosure Act (HMDA); the small business and small farm loans were reported under the CRA. During fourth quarter 2004, examiners verified the integrity of mortgage, business and farm loan data the bank reported in 2003 and year-to-date 2004. The three loan types were found to have acceptable data integrity.

The evaluation period for the HMDA, small business and small farm loans covers the period from January 1, 2003 through September 30, 2004. Service test criteria, community development loans and qualified investments were reviewed from October 28, 2002 through January 24, 2005. Although the bank's record of agricultural and multifamily lending was subject to review as part of this evaluation, business and mortgage lending received the primary focus, as they comprise the majority of the bank's lending portfolio by dollar volume and number of originations since the prior evaluation. The tables in Appendix D detail the level of multifamily and agricultural lending in both LMI and non-LMI areas. Multifamily loans supporting housing in LMI areas were considered for the community development loan portion of the lending test.

The bank's mortgage and small business loan performance was compared to the aggregate of all lenders in its assessment areas that were subject to the reporting requirements of HMDA and CRA. At the time of this evaluation, aggregate data was only available for 2003; accordingly, the tables in Appendix D only contain 2003 bank data and 2003 aggregate data. The 2004 bank data was analyzed and included in the analysis as performance context.

For evaluation of the geographic distribution of loans, geographies were classified on the basis of the Census Bureau's 2000 income data. Performance was rated based on penetration in LMI geographies. For the evaluation of borrower characteristics, borrower income levels were based upon 2003 estimated median family income from the U.S. Department of Housing and Urban Development (HUD). The performance in connection with lending to LMI borrowers was analyzed separately.

Gold's performance in the Kansas City multistate MSA assessment area (Kansas City MSA) received significantly greater weight in determining the bank's overall ratings because of the concentration of deposits, lending and demographics of the area. Of the bank's four rating areas, the Kansas City MSA contains 68.1 percent of the institution's total deposits and 50.1 percent of the mortgage, business and agricultural lending by number of originations.

In order to gain an understanding of community credit needs, interviews were conducted with members of the community during the evaluation, and community contacts within the bank's assessment area from other regulatory agencies were also reviewed. Community contacts included representatives of city government, realty companies, housing authorities, and economic development corporations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Gold's record of meeting the credit needs of the assessment areas through its lending activities is rated satisfactory based on the cumulative performance in all the bank's designated assessment areas. The level of community development lending was also factored into the overall performance rating.

Appendix D tables are comprised of the data used to evaluate the bank's lending test performance in its various assessment areas. Lending activity is depicted in Table 1, geographic distribution in Tables 2-7, and borrower characteristics are noted in Tables 8-12.

Lending Activity: The bank's lending activity demonstrated favorable responsiveness to the retail credit needs in its assessment areas when measured in terms of the dollar amount and number of HMDA-related and small business loans originated in each assessment area. This conclusion was based on excellent lending activity in the Kansas City MSA, and favorable

lending performance in the states of Kansas, Missouri and Oklahoma. The bank also had good lending levels for small farm loans in the Oklahoma City MSA and Rural Oklahoma assessment areas; however, the focus of this evaluation is on the bank's HMDA and commercial lending, as previously mentioned.

As noted in Exhibit 1, the bank originated 5,627 loans during the evaluation period totaling approximately \$688 million. Home mortgage lending dominated the bank's CRA lending activity in terms of originations and dollar volume. The bank clearly surpassed the level of lending that was noted during the prior evaluation, although a portion of the growth can be attributed to recent merger activities.

Exhibit 1 Gold Bank Summary of Lending Activity							
Loan Type	#	%	\$('000s)	%			
HMDA home purchase	978	17.4	125,428	18.2			
HMDA refinancings	1,761	31.3	237,251	34.5			
HMDA home improvement	152	2.7	8,520	1.2			
HMDA multifamily	17	0.3	7,557	1.1			
Total HMDA-related	2,908	51.7	378,756	55.0			
Total small business	1,945	34.6	267,106	38.8			
Total small farm	774	13.7	42,292	6.2			
TOTAL LOANS	5,627	100.0	688,154	100.0			

Assessment Area Concentration: Gold originated a majority of loans in its assessment areas. As detailed in Exhibit 2, 66.4 percent of the number and 72.5 percent of the dollar amount of loans were made in the bank's assessment areas. Lending activity is detailed on Table 1 of Appendix D for each individual state, and only loans made within the bank's assessment areas were considered for the geographic, borrower, and size of business distribution tests.

Exhibit 2 Lending Inside and Outside Gold Bank's Assessment Areas								
		Ins	side			Oı	utside	
	#	%	\$('000s)	%	#	%	\$('000s)	%
HMDA home purchase	705	72.1	90,857	72.4	273	27.9	34,571	27.6
HMDA refinancings	1,060	60.2	145,403	61.3	701	39.8	91,848	38.7
HMDA home	116	76.3	6,423	75.4	36	23.7	2,097	24.6
HMDA multifamily	14	82.4	6,301	83.4	3	17.6	1,256	16.6
Total HMDA-related	1,895	65.2	248,984	65.7	1,013	34.8	129,772	34.3
Total Small Business	1,537	79.0	229,645	86.0	408	21.0	37,461	14.0
Total Small Farm	303 39.1 20,281 48.0 471 60.9 21,980				52.0			
TOTAL LOANS	3,735	66.4	498,910	72.5	1,892	33.6	189,213	27.5

The divestiture of 11 bank branches in northeastern Kansas, two in eastern Kansas, and three in west central Oklahoma during 2004 had an impact on the bank's lending within its assessment area. The assessment areas used in this evaluation did not include the areas related to the divested branches, although the loans originated at each branch location were included in the bank's reported CRA and HMDA data for years 2003 and 2004. This effect was most pronounced within the bank's agricultural lending portfolio, as noted in Exhibit 2, given that the 15 divested branches were located in predominantly rural areas. Accordingly, the bank's record of lending within its current assessment area was actually more favorable than the performance reflected in Exhibit 2.

Geographic and Borrower Distribution: The overall geographic distribution of HMDA-related and small business loans reflected a favorable penetration in LMI geographies across all rated assessment areas. The Kansas City MSA received the greatest weight for the overall performance, based on the volume of lending and portion of the bank's total assets located in that area. However, lending levels were also good in the remainder of the bank's assessment areas. Geographic distribution is discussed in more detail within each assessment area.

The overall distribution of loans among borrowers of different income levels and businesses of different sizes was good based on consistent performance across all rated assessment areas. The bank's distributions may have lagged the demographics in some areas, but was consistently equal to or above the aggregate performance in the majority of assessment areas. A detailed analysis of the borrower income distribution is provided with the analysis of each assessment area.

Community Development Lending: Gold's overall community development lending performance was adequate, and the loans were noncomplex. The bank originated 28 loans totaling \$37.6 million. The majority of the bank's efforts focused on its primary market within the Kansas City MSA, which had 92.9 percent of the number and 98.0 percent of the dollar volume of total community development lending. Details of community development lending are provided in the discussion of each assessment area. Table 1 of the individual state tables

in Appendix D also summarizes the number and dollar volume of community development lending within each area.

Gold's community development lending was generally responsive to assessment area credit needs identified by community contacts. As illustrated in the table at right, the bank was most active in those opportunities that revitalize and stabilize LMI geographies (67.9 percent) and provide affordable housing (28.6 percent). Affordable and quality housing is considered a

Community Development Lending						
Purpose	#	\$('000s)				
Affordable Housing	8	7,331				
Revitalize & Stabilize	19	29,718				
Community Services	1	600				
Economic Development	0	0				
Totals	28	37,649				

need in all of the bank's assessment areas. Gold's community development lending supported these needs by providing affordable housing or revitalizing older housing units in LMI geographies.

The following programs are available throughout the bank's assessment areas and were considered in evaluating the bank's flexible lending practices to address the credit needs of its assessment areas.

- Small Business Administration (SBA) Gold is a Certified/Preferred SBA lender. In 2003, the bank originated 16 SBA loans totaling \$3.4 million, and for 2004, Gold originated 50 loans for \$8.8 million.
- <u>Secondary Market Lending</u> The bank originated 1,373 loans totaling \$184.1 million in 2003 for sale to the secondary market. For 2004, the bank originated 584 loans for \$77.9 million.
 - Federal Housing Administration (FHA) and Veterans Administration (VA) Lending
 Included in the secondary market lending volumes are FHA and VA loans. Gold originated 79 FHA and VA loans totaling \$7.6 million in 2003, and 74 FHA and VA loans totaling \$6.6 million in 2004.
- Farm Service Agency (FSA) During 2004, the bank originated 13 FSA loans totaling \$1.4 million in the state of Oklahoma.

INVESTMENT TEST

The bank's investment test performance is rated high satisfactory. Although the investment levels in the Tulsa MSA, St. Joseph MSA, and Rural Kansas assessment areas were poor, the overall rating is weighted towards the Kansas City MSA, which was considered favorable. In addition, the state of Oklahoma performance was bolstered by the investment activity in the Oklahoma City MSA and Rural Oklahoma assessment areas, although rural Oklahoma only received a limited review as part of this evaluation. The ratings for the states of Kansas and

Missouri reflect only those investments that affect that area. However, investments in the Kansas City Multistate MSA benefit both states.

During the evaluation period, the bank had \$10.7 million qualified community development investments. This was an increase from the last evaluation, when the bank had \$6.5 million in qualified investments and \$1.7 billion in total assets. In the Kansas City, the bank had MSA,

Community Development Qualified Investments						
		ot/Equity	Grants &			
Purpose	Inve	estments	nts Donations			
	#	\$('000s)	#	\$('000s)		
Affordable Housing	7	8,621	4	5		
Revitalize and Stabilize	1	2,070	0	0		
Community Service	0	0	29	36		
Economic Development	0	0	6	69		
Totals	8 10,691 39			110		

investments totaling \$8.0 million and 34 donations in the amount of \$56M. The table to the right details the bank's qualified investments, which are also discussed in other sections of this evaluation.

The bank exhibits adequate responsiveness to community development needs and occasionally uses innovative investments to support community development initiatives. The investments offered by the bank are not complex. While it was noted that the bank does have a significant level of community development investment dollars, the number of qualified community development investments and donations was relatively low. However, opportunities to participate in qualifying investment activities in several of the bank's assessment areas are limited.

SERVICE TEST

Gold's overall performance under the service test is considered low satisfactory based on performance in all of its assessment areas. Gold's offices are generally accessible to all portions of its assessment areas, including LMI geographies. The bank operates 28 full-service branch offices with 3 (10.7 percent) located in LMI geographies. Gold also manages 32 ATMs with 2 (6.3 percent) located in LMI geographies.

The bank has undergone a number of structural changes since the last CRA evaluation. In April 2004, GBCI merged the company's Oklahoma banking operations into the Kansas operation. The merger increased the number of branches by a total of 13, although three of the branches in west central Oklahoma were divested approximately a month after the merger. In addition, eleven branches in northeastern Kansas and two branches in eastern Kansas (south of the Kansas City MSA) were sold during late 2003 and first quarter 2004. Business hours and services do not vary in a way that inconveniences or adversely affects the accessibility of its delivery systems, although branches and ATMs are predominantly located in middle- and upper-income areas.

Gold has an adequate level of community development services in all of its assessment areas. As the table to the right indicates, a majority of the services were targeted to support community services. The majority of qualified community service activity reported by the bank occurred in the Kansas City MSA, where the majority of banking locations and assets are located. The bank's level

Community Development Services				
Purpose	#			
Affordable Housing	4			
Revitalize and Stabilize	1			
Community Services	9			
Economic Development	4			
Totals	18			

of community development services in Missouri, Kansas and Oklahoma was generally consistent with its investment test performance in those areas.

COMPLIANCE WITH ANTIDISCRIMINATION LAWS

An evaluation of Gold's fair lending activities was conducted during the evaluation. No credit practices were identified that violated the substantive provisions of the anti-discrimination laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act. Further, the bank was not engaged in any other illegal credit practices inconsistent with helping to meet community credit needs.

MULTISTATE METROPOLITAN AREA

CRA RATING FOR KANSAS CITY (KC) MO-KS MSA1: "SATISFACTORY"

The lending test is rated: Outstanding

The investment test is rated; <u>High Satisfactory</u>
The service test is rated: Low Satisfactory

Major factors supporting the rating include:

- Excellent responsiveness to assessment area credit needs;
- Excellent geographic distribution of loans in the bank's assessment area;
- Excellent distribution of loans among individuals of different income levels;
- · An adequate level of community development lending;
- A good level of qualified investments;
- An adequate level of community development services; and,
- Generally accessible delivery systems to geographies and individuals of different income levels.

SCOPE OF EXAMINATION

Gold's Kansas City multistate assessment area consisted of five of the 11 MSA counties, including three counties in Missouri and two in Kansas. The lending data that was analyzed included the period from January 1, 2003 to September 30, 2004. For community development lending, investments and services, the evaluation period was from October 28, 2002 to January 24, 2005. The Kansas City MSA has the majority of bank deposits, loans, branches, population, LMI tracts, owner-occupied housing units, and business establishments, when compared to the remainder of the bank's assessment areas. Therefore, the bank's performance in the Kansas City MSA received the greatest weight in its overall CRA performance.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE KANSAS CITY MO-KS MULTISTATE METROPOLITAN ASSESSMENT AREA

The Kansas City MSA contains 50.0 percent of the branches and 68.1 percent of the deposits for all bank assessment areas, excluding the recently merged Florida operation. The area also contains 62.1 percent of the total HMDA-related, business and agricultural lending originated during the evaluation period. According to the FDIC Market Share Report as of June 30, 2004, Gold's market share was 5.9 percent and ranked sixth among 108 financial institutions in the

¹ This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained in the multistate metropolitan area.

five-county assessment area. The bank's ranking in the entire Kansas City MSA was similar; Gold ranked sixth among 154 financial institutions with 5.2 percent of the total market share.

DESCRIPTION OF THE BANK'S ASSESSMENT AREA

A substantial majority of the MSA population resided in the assessment area, and accordingly, the area's population trends and demographic characteristics were comparable to those in the MSA as a whole. In 2000, the assessment area contained 85.7 percent of the total MSA population, 85.2 percent of the MSA families, and 86.8 percent of the MSA housing units.

Labor, Employment and Economic Characteristics

The Kansas City MSA economy was diverse with service, government, and retail industries serving as its primary employment sectors. At year end 2003, service industries comprised 38.2 percent of the MSA employment base, followed by government (14.5 percent), and retail trade (11.3 percent). Among the MSA's largest employers in March 2004 were Sprint Corporation; Community Health Group; DST Services, Inc.; Ford Motor Company; HCA, Inc.; Hallmark Cards, Inc.; Saint Luke's Health Systems; and, UPS.

The MSA has experienced a weak labor market, with a high unemployment rate that exceeded statewide unemployment rates from 2001 to 2003. MSA unemployment grew from 5.7 percent in 2002 to 6.0 percent in 2003, compared to statewide rates of 5.1 percent and 5.7 percent, respectively.

Increasing office vacancy rates were also indicative of a sluggish economy. Office vacancy rates increased annually from 2001 to 2003 and reached 22.8 percent in 2003. The MSA industrial vacancy rate was less affected, although it increased from 10.6 percent in 2002 to 12.7 percent in 2003.

Despite a weak economy, the MSA's number of single-family housing permits grew by 9.2 percent in 2002 and 9.4 percent in 2003. In the first half of 2004, the number of single-family housing permits was 7.0 percent higher than during the same period in 2003. In contrast, the MSA multifamily housing unit market receded in 2002 and 2003. Multifamily housing units decreased by 31.2 percent in 2002 and 17.4 percent in 2003.

The area's concentration of small businesses was slightly higher than the distribution for the entire MSA. Dun and Bradstreet (D&B) data indicated that 81.5 percent of the area's nonfarm businesses had gross annual revenues at or below \$1 million.

Income Characteristics

The area was middle-income overall with a median family income of \$56,314, which was 101.0 percent of the entire MSA median family income of \$55,779. The assessment area concentrations of low-income families and families living below the poverty level were

comparable to the entire MSA. The MSA as a whole had a family income distribution that included 18.3 percent low-, 18.8 percent moderate-, 23.8 percent middle-, and 39.1 percent upper-income. The poverty rate for the entire MSA was 6.1 percent.

Housing Characteristics

The housing characteristics for the assessment area, as displayed in Exhibit 3, were similar to those noted in the entire MSA. The assessment area had a slightly larger stock of multifamily units than in the MSA as a whole. Of the total area housing stock, 17.5 percent was multifamily units, compared to 15.7 percent MSA-wide. Area housing was slightly more costly than in the MSA as a whole and less affordable for area residents, showing a need for affordable housing development. In 2000, the area's median housing value of \$105,842 was 1.4 percent higher than the MSA housing value of \$104,400, which resulted in the area having a .42 affordability ratio. The MSA affordability ratio was .44, indicating greater affordability.

The affordability ratio is calculated by dividing the median household income by the median housing value. This figure represents the amount of single family owner-occupied housing that a dollar of income can purchase for the median household in the geography. Values closer to 1.0 generally indicate greater affordability.

Exhibit 3 summarizes various assessment area economic and demographic characteristics.

Exhibit 3 Kansas City MO-KS MSA Assessment Area Demographics									
Income Categories	Tra Distrib	ution*	Tract Inc	Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%	
Low-income	46	10.2	20,042	5.0	6,180	30.8	73,479	18.4	
Moderate-income	122	27.2	79,300	19.8	10,391	13.1	73,795	18.4	
Middle-income	158	35.2	174,378	43.6	6,834	3.9	92,792	23.2	
Upper-income	111	24.7	126,304	31.6	1,822	1.4	159,958	40.0	
Total Assessment									
Area	449	100.0	400,024	100.0	25,227	6.3	400,024	100.0	
	Housing		•	HOUSING	G TYPES BY	TRACT			
	Units by	Ow	ner-occupie	d	Renta	ı	Vaca	nt	
	Tract	#	%		#	%	#	%	
Low-income	38,965	14,472	3.6	37.1	18,365	47.1	6,128	15.7	
Moderate-income	150,243	70,700	17.6	47.1	65,162	43.4	14,381	9.6	
Middle-income	279,165	179,628	44.6	64.3	86,632	31.0	12,905	4.6	
Upper-income	174,488	137,420	34.2	78.8	30,015	17.2	7,053	4.0	
Total	,	,			,		Í		
Assessment									
Area	642,861	402,220	100.0	62.6	200,174	31.1	40,467	6.3	
	Total Busi	nacaca by		Busine	sses by Tract	& Revei	nue Size		
		nesses by act	Less Th	an or =	Over \$4	Over \$1 Million Revenue Not			
	110	acı	\$1 Mi	illion	Over \$1	WIIIION	Repo	rted	
	#	%	#	%	#	%	#	%	
Low-income	1,735	4.4	1,379	4.3	310	4.9	46	4.9	
Moderate-income	8,246	21.0	6,497	20.2	1,559	24.7	190	20.3	
Middle-income	16,852	42.8	14,165	44.2	2,311	36.5	376	40.2	
Upper-income	11,930	30.3	9,692	30.2	1,931	30.5	307	32.9	
Tract not									
reported	589	1.5	359	1.1	214	3.4	16	1.7	
Total									
Assessment									
Area	39,352	100.0	32,092	100.0	6,325	100.0	935	100.0	
		e of Total B		81.5		16.1		2.4	
*Twelve area tracts (2.7	percent of tota	l tracts) contain	ed no families or	housing uni	ts and were exclu	ded from th	ese calculations.		

Community Contacts

One community contact was conducted as part of this evaluation. The contact discussed the need for bank involvement in affordable housing initiatives. In addition, four recent contacts conducted in conjunction with the CRA evaluation of another non-related financial institution located near Gold's main office were reviewed to ascertain if community credit needs were being met by local financial institutions. Two of the contacts discussed the vibrant competition in Johnson County (Kansas) among the various lenders, but did not specifically note any major credit needs in the area that were not being met. The other two contacts discussed the need

for more affordable housing in the area, as evidenced by the large number of individuals that commute into Johnson County for work, as well as renovation and home improvement loans to revitalize Johnson County's older core areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KANSAS CITY MO-KS MSA AREA

LENDING TEST

Gold's performance with respect to the lending test in the Kansas City MSA is considered outstanding. The Kansas City MSA received a full-scope review, which revealed that lending by borrower, size of business and geographic distribution were highly favorable, and community development lending was adequate. The data used to evaluate the bank's performance in the assessment area appear in the Appendix D tables. Lending activity is depicted in Table 1, geographic distribution in Tables 2-7, and borrower characteristics in Tables 8-12.

Lending Activity: The bank's lending activity indicates an excellent responsiveness to the retail credit needs of the assessment area in relation to the bank's capacity and performance context issues. During the evaluation period, the bank originated 1,878 HMDA-related and business loans within the Kansas City MSA totaling approximately \$319.8 million.

Geographic Distribution: The overall geographic distribution of HMDA-related and small business loans reflected excellent penetration in LMI geographies. Performance context issues, including lending opportunities reflected in the number and percentage of owner-occupied housing units and businesses, as well as aggregate performance, were considered.

Home Purchase Loans

The geographic distribution of home purchase loans across geographies of different income levels reflected noteworthy penetration in LMI geographies. The bank's performance in low-(8.2 percent) and moderate-income (25.1 percent) geographies significantly exceeded the aggregate performance of HMDA lenders in LMI geographies, at 2.1 percent and 13.3 percent, respectively. In 2004, the bank surpassed its 2003 performance levels by originating 11.8 percent and 38.2 percent of its home purchase loans in low- and moderate-income tracts, respectively. Aggregate data was not available for 2004, although the percentage of owner-occupied housing units in low-income tracts (3.5 percent) and moderate-income tracts (17.1 percent) was well below the bank's level of lending.

Refinance Loans

Home refinance lending across geographies of different income levels was reasonable. Gold Bank's performance in low-income tracts (1.8 percent) was slightly above the aggregate

lending figure (1.5 percent). However, the bank's performance in moderate income geographies (8.4 percent) was below the aggregate performance (10.2 percent). Demographic data indicated that 3.6 percent and 17.6 percent of the area's owner-occupied housing units were located in LMI geographies, respectively. Lending for 2004 was similar, with 1.4 percent of the bank's home refinance loans in low-income tracts, compared to demographic data of 3.5 percent. The bank's lending level in moderate-income tracts (15.8 percent) was also lower than the demographic data (17.1 percent).

Home Improvement Loans

During 2003, the bank did not originate any home improvement loans in low-income geographies. However, 36.4 percent of its loans were made in moderate-income tracts, compared to the aggregate lending level of 18.0 percent and the demographic owner-occupied housing distribution of 17.6 percent. Gold improved its home improvement lending during 2004 in low-income tracts (10.0 percent), when compared to the demographics (3.5 percent). However, lending in moderate-income tracts (15.0 percent) was somewhat lower than the demographic level (17.1 percent).

Small Business Loans

The geographic distribution of small business loans was good in LMI geographies. The banks performance in low-income tracts (2.2 percent) was lower than both the aggregate level (2.9 percent) and the demographic location of area businesses by tract income level (4.4 percent). However, the bank's performance in moderate-income tracts (21.6 percent) exceeded the aggregate (16.9 percent) and demographic data (20.9 percent). Lending levels in 2004 were similar. The bank lending levels in low- and moderate-income geographies were at 4.0 percent and 18.7 percent, compared to demographics of 4.4 percent and 19.7 percent, respectively.

Multifamily Loans

During 2003, the bank reported 13 multifamily loans on its HMDA LAR, including 23.1 percent and 38.5 percent in low- and moderate-income tracts, respectively. This lending performance was excellent when compared to the LMI demographics of 7.5 percent and 30.1 percent for multifamily units in each respective income classification. The performance in low-income tracts significantly exceeded the aggregate (13.7 percent), and performance in moderate-income tracts was slightly below the aggregate (40.5 percent).

Distribution by Borrower Income and Revenue Size of the Business: The distribution of loans across borrower income levels reflected noteworthy performance. The number and percentage of LMI families, high cost of housing relative to low incomes, performance context issues, size of business, and aggregate performance in the assessment area were all considered in the analysis.

Home Purchase Loans

Gold's distribution of home purchase lending to low- and moderate-income borrowers displayed reasonable performance. In 2003, the bank's distribution to both low- and moderate-income borrowers (11.1 percent and 19.8 percent, respectively) was below the aggregate (11.3 percent and 22.7 percent, respectively), although well within the range of favorable performance. However, performance was at a lower level in 2004 (7.1 percent and 8.5 percent), when compared to demographics (18.0 percent and 18.2 percent).

Refinance Loans

The bank's lending level for refinance loans reflected good performance. Gold's performance for lending to low-income borrowers (5.7 percent) in 2003 was lower than the aggregate (7.7 percent). However, the bank's lending performance for moderate-income borrowers (20.2 percent) was higher than the aggregate lending level (17.3 percent). In 2004, the bank's refinance lending levels to low- and moderate-income borrowers were 6.5 percent and 13.0 percent, compared to demographics of 18.0 percent and 18.2 percent, respectively.

Home Improvement Loans

The bank's distribution of home improvement loans reflected good performance. The 2003 distribution to low-income borrowers was 9.1 percent compared to 16.7 percent for aggregate lending data. Lending to moderate-income borrowers was 18.2 percent, compared to 18.5 percent for the demographics and 24.7 percent for the aggregate. Lending levels for 2004 were generally consistent with 2003 performance.

Small Business Loans

The overall distribution of lending to businesses of different sizes was excellent. The bank's lending to businesses with gross annual revenues (GAR) of \$1 million or less was 71.8 percent compared to the aggregate of 33.8 percent and demographic data of 81.6 percent. Bank and demographic figures for 2004 were nearly identical.

Although the bank's lending to small businesses was lower than the demographics, its lending level was more than twice the figure noted for aggregate data. The aggregate lending data provides a better comparison because not all businesses have the financial capacity to qualify for traditional bank loans. The aggregate data reflects the market demand for credit from qualified borrowers. Accordingly, the bank is outperforming many of its peers in the assessment area, and originates a substantial majority of its commercial loans to small businesses, as defined by the CRA. These loans are further stratified by loan size. Over 77 percent of the 2003 loans to small businesses were in amounts of \$250,000 or less, which are amounts typically needed by smaller businesses.

Community Development Loans: Gold's lending performance in this category is adequate. The bank provided \$36.9 million in funding for 26 community development loans in the MSA assessment area. As noted in the table at right, the majority of loans were targeted to activities that revitalized or stabilized LMI geographies. Examples of the bank's community development loans included:

Community Development Lending						
Purpose	#	\$('000s)				
Affordable Housing	8	7,331				
Revitalize and Stabilize	17	28,971				
Community Services	1	600				
Economic Development	0	0				
Totals	26	\$36,902				

- \$4.1 million to construct a 54-unit senior housing center to be rented primarily to LMI individuals. The center is located in a moderate-income tract within the city of Kansas City, Missouri's urban core strategy area that is targeted for redevelopment and stabilization.
- \$1.1 million to construct an 18-unit senior citizen apartment building and community room. The project has been qualified for Federal and State of Missouri low-income housing tax credits.

In addition, the bank issued a \$5.4 million commitment letter to fund the pre-development costs of a project located in an area targeted by the city of Kansas City, Missouri as a revitalization zone. The bank also offers a first-time homebuyer program with up to 97 percent loan-tovalue, no private mortgage insurance required, and a waiver of underwriting and processing fees for borrowers with limited income and a good credit history.

INVESTMENT TEST

Gold has a favorable level of qualified community development investments and grants in the Kansas City MSA, while most of the investments were non-complex. The bank exhibits adequate responsiveness to community development needs, as noted by its donation and grant activity. Gold provided 39 qualifying investments totaling \$8.1 million dollars during the review period.

The table at right details the bank's investment activity within the Kansas City MSA. Although the number of investments is not high, several were comprised of collateralized mortgage obligations (CMOs) that provided funds for housing that targeted a significant number of low- and moderate-income Furthermore, 34 of the borrowers. qualifying investments consisted of grant and donation activity, with 26 donations to organizations that primarily provided

Community Development Qualified Investments						
	De	bt/Equity	Grants &			
Purpose	Inv	estments	Donations			
	#	\$('000s)	#	\$('000s)		
Affordable Housing	5	8,040	3	3		
Revitalize and Stabilize	0	0	0	0		
Community Services	0	0	26	34		
Economic Development	0	0	5	19		
Totals	5	8,040	34	56		

community services to LMI individuals and families. Examples of the bank's investment activity included:

- \$4.6 million multifamily housing revenue bonds issued by a local municipality for the purpose of constructing or rehabilitating multifamily housing projects located in Missouri and targeting 50 percent to low-income and 40 percent to moderate-income purchasers.
- \$1.3 million CMO with 11 underlying mortgage loans on single family residences. Ten loans were to LMI borrowers.

Gold purchased a block of 17 loans totaling \$739M from a not-for-profit lender, in order to provide the lender with capital to fund additional loans. The loans are generally to minority borrowers with derogatory credit history and limited means to offer the total down payment amount required for conventional financing. If borrowers under the lender's program are able to establish a suitable payment history of 24 months or more, they may apply to traditional lenders for conventional loan products to refinance the original debt. Although this purchase of loans by Gold would not be considered a debt or equity instrument traditionally associated with the requirement to qualify as a community development investment under the CRA, it generally has the same effect as a CMO equity instrument targeted towards affordable housing for LMI individuals.

SERVICE TEST

Performance under the service test was adequate based on the accessibility of delivery systems, the impact of branch openings and closings, and the level of community development services.

Retail Services: Gold has 14 banking offices and 18 ATMs in the Kansas City MSA. Five of the offices are in middle-income tracts and nine are in upper-income tracts. In addition to the ATMs located at most of the branch offices, the bank has three cash-only ATMs in the assessment area. Since the prior evaluation, the bank opened one branch and closed one branch. Both of the branches were located in middle-income areas. Bank offices are fairly accessible to all portions of the assessment area. In addition, the wide array of services offered by the bank do not vary in a way that inconveniences certain portions of the assessment area or LMI individuals. Business hours are also adequate.

Community Development Services					
Purpose	#				
Affordable Housing	4				
Revitalize and Stabilize	1				
Community Services	7				
Economic Development	3				
Totals	15				

Community Development Services: Gold provides an adequate level of community development services in the Kansas City MSA. As indicated in the table at left, the bank provided a total of 15 services in the area that were diversified across community development purposes. Examples of community development

services include:

- A bank officer serves on the board and offers financial expertise to an organization that provides a range of services to low and very low-income persons in primarily the Hispanic community.
- A bank officer serves on the advisory board and is chairman of the finance and development committees of a community development corporation (CDC) whose mission is to provide quality, stable, and affordable housing through real estate development, new construction and rehabilitation. The CDC also provides housing development, economic development, and neighborhood organizing services to the neighborhoods it serves.
- A bank officer serves on the board of directors and as a representative on a
 development and neighborhood revitalization committee that aids resident-led,
 community-based development organizations that transform distressed communities
 and neighborhoods into healthy ones. By providing capital, technical expertise, training
 and information, the organization supports the development of local leadership and the
 creation of affordable housing, commercial, industrial and community facilities,
 businesses and jobs.

To better serve its customers, the bank's loan officers are available to make onsite visits to a borrowers' place of business to facilitate the processing of a loan transaction.

STATE OF KANSAS

CRA RATING FOR KANSAS²: "SATISFACTORY"
The lending test is rated: High Satisfactory
The investment test is rated: Needs to Improve
The service test is rated: Low Satisfactory

Major factors supporting the rating include:

- Good responsiveness to assessment area credit needs;
- Favorable geographic distribution of loans in the bank's assessment area;
- Reasonable distribution of loans among individuals of different income levels and businesses of different sizes;
- A poor level of qualified community development investments;
- An adequate level of qualified community development services; and,
- Generally accessible delivery systems to geographies of different income levels.

SCOPE OF EXAMINATION

For the state of Kansas rating, a full-scope analysis was conducted of Gold's only assessment area in the state. Accordingly, the statewide performance will be discussed concurrently with the bank's performance in the rural Kansas assessment area. The scope of the evaluation for the state of Kansas was generally consistent with the overall scope of the evaluation for the entire institution, including an evaluation under the lending, investment and service tests. The lending data included the period from January 1, 2003 to September 30, 2004. The bank originated 13 percent of its agricultural loans in the assessment area, so the analysis includes a brief discussion of the small farm lending performance. For community development investments, the evaluation period was from October 28, 2002 to January 24, 2005. The bank did not report any qualified community development loans or services under the CRA during the evaluation period for the state.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN KANSAS

The bank has designated Crawford and Cherokee Counties as the assessment area for its rural Kansas operations. Although the assessment area includes two counties, all banking operations are located in Pittsburg, Kansas, and consist of two branches with ATMs and two

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

cash dispensing ATMs at off-site locations. On June 30, 2004, only 5.1 percent of the bank's \$2.4 billion in deposits was in the rural Kansas assessment area. Accordingly, this area had a minor impact on the overall CRA rating. However, the bank ranks second in market share in its two-county assessment area, with 14.3 percent of the deposits held by 21 financial institutions. Since the prior evaluation, 9.5 percent of the number and 6.3 percent of the dollar amount of Gold's reported mortgage, business and agricultural loans were originated to borrowers in the rural Kansas assessment area. The lending percentages, however, were diluted by the April 2004 merger of the Oklahoma branches and inclusion of Oklahoma's lending data for all of 2004 in this evaluation.

DESCRIPTION OF THE BANK'S ASSESSMENT AREA

Labor, Employment and Economic Characteristics

Manufacturing, government and service industries were vital to the area economy, although ties to agriculture remained strong. Among the area's largest employers were Pittsburg State University, Mount Carmel Medical Center, Care Calls (hospital and family services), Superior Industries International (aluminum foundries), Wal-Mart, Millers Professional Imaging (photo finishing laboratories), Premdor Entry Systems (metal door sashes), and Ace Electric (engine electrical equipment). D&B data indicated that 11.3 percent of the area industries were related to agriculture. The primary farm commodities produced in the assessment area were cattle, soybeans, wheat, hay, corn, and sorghum.

The area economy was sluggish, although it stabilized somewhat in 2003 and the first half of 2004. In 2002, Crawford County's unemployment rate dropped to 4.7 percent, which was below the statewide rate of 5.1 percent. However, the county's unemployment rate increased to 4.9 percent in 2003 but remained below the 2003 statewide rate of 5.4 percent.

Income Characteristics

In 2000, the area was a middle-income area overall, with a median family income (\$39,262) that was 93.2 percent that of statewide rural Kansas as a whole (\$42,114). Nonetheless, it contained high concentrations of LMI families and families living at or below the poverty level. The area had the following income distribution in 2000: 21.1 percent low-income, 20.4 percent moderate-income, 24.2 percent middle-income, and 34.3 percent upper-income. In addition, 10.2 percent of the families in the assessment area lived in poverty.

Housing Characteristics

Exhibit 4 displays the area's general housing characteristics. The area contained a large stock of modestly-priced, single family housing units in 2000. Of the total area housing stock, 37.0 percent was valued at under \$40,000, and the area's median housing value was \$52,210. In statewide rural areas, 36.2 percent of the housing units were valued at under \$40,000 and

the median housing value was \$61,176. Owner-occupied housing affordability in the area was identical to the statewide rural area ratio of .56.

The area's median gross rent (\$433) was higher than in rural Kansas as a whole (\$416), and 36.8 percent of area renters paid more than 30 percent of their incomes for rent, compared to 28.2 percent in statewide rural areas. One of Kansas' five state universities is located in Pittsburg, and the rental cost disparity may reflect the area's large student population.

	Rural	Kansas A	Exhik Assessme		Demograp	hics		
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,335	21.1
Moderate-income	4	23.5	3,628	23.0	545	15.0	3,221	20.4
Middle-income	12	70.6	10,864	68.7	936	8.6	3,826	24.2
Upper-income	1	5.9	1,312	8.3	129	9.8	5,422	34.3
Total Assessment Area	17	100.0	15,804	100.0	1,610	10.2	15,804	100.0
A33C33IIICIII AICU	Housing	HOUSING TYPES BY TRACT				13,004	100.0	
	Units by	Owner-occupied			Rental		Vacant	
	Tract	#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	6,700	3,445	20.6	51.4	2,492	37.2	763	11.4
Middle-income	18,006	12,023	71.8	66.8	4,050	22.5	1,933	10.7
Upper-income	2,546	1,266	7.6	49.7	1,103	43.3	177	7.0
Total	,	,			,			
Assessment Area	27,252	16,734	100.0	61.4	7,645	28.1	2,873	10.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	544	31.7	466	31.6	58	31.2	20	35.7
Middle-income	1,021	59.4	881	59.7	106	57.0	34	60.7
Upper-income	153	8.9	129	8.7	22	11.8	2	3.6
Total								
Assessment Area	1,718	100.0	1,476	100.0	186	100.0	56	100.0
	Percentage	e of Total Bu	usinesses:	85.9		10.8		3.3

Community Contacts

Two community contacts conducted in conjunction with the public evaluations of two nonrelated financial institutions were reviewed to ascertain any unmet credit needs in the area. The contacts indicated that the area's credit needs were generally being met by a number of financial institutions, although one contact discussed opportunities in the future for additional home improvement lending as the area housing stock continues to age.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

The overall rating for Gold's performance within the state of Kansas is high satisfactory. The bank's lending activity demonstrated a good responsiveness to retail credit needs of the assessment area. The geographic, borrower, and size of business distributions were favorable, although the bank did not originate any qualified community development loans in the rural Kansas assessment area. The data used to evaluate the bank's performance appear in the Appendix D tables. Lending activity is depicted in Table 1, geographic distribution in Tables 2-7, and borrower distribution in Tables 8-12.

Lending Activity: The bank's lending activity in Kansas is good. During the evaluation period, the bank originated 168 HMDA-related, 148 business and 39 farm loans. The majority of the weight for the lending test in the area will be placed on the bank's home mortgage and business lending. The bank's record of agricultural lending in this market, while considered, did not carry significant weight in the overall performance.

Geographic Distribution: The overall distribution of HMDA-related, business and farm lending reflected a good distribution within geographies of all income levels, although there were no low-income tracts in the area. Performance context issues were considered, including lending opportunities reflected in the number and percentage of owner-occupied units, number and percentage of small businesses and farms, and aggregate lending performance.

Home Purchase Loans

The geographic distribution of home purchase loans was excellent based on performance in the area's moderate-income tracts. During 2003, the bank originated 30.4 percent of its loans in moderate-income tracts, compared to the aggregate of 26.6 percent, and the demographics of 20.6 percent. The bank's 2004 performance was also strong, with 23.5 percent of its home purchase loans originated in moderate-income tracts, compared to 12.5 percent of the owner-occupied housing units located in those areas.

Refinance Loans

Gold's performance for mortgage refinance loans during 2003 was weak. The bank originated 5.0 percent of its refinance loans in moderate-income tracts, compared to the aggregate of 17.9 percent and the demographics of 20.6 percent. Performance in 2004 improved; however, it was still low. The bank originated 8.6 percent of its loans in moderate-income tracts, compared to the demographic dispersion of 12.5 percent.

Home Improvement Loans

Lending for 2003 home improvement loans in moderate-income tracts was adequate (14.3 percent), compared to the aggregate of 20.9 percent and the demographics of 20.6 percent. The bank's performance in 2004 improved with 15.8 percent of the bank loans in moderate-income tracts, compared to the demographics of 12.5 percent.

Small Business Loans

The geographic distribution of small business loans was adequate in moderate-income tracts. For 2003, the bank's penetration of loans to moderate-income tracts was 18.8 percent, which was below the aggregate of 26.7 percent and the demographics of 31.7 percent. In 2004, performance was improved. The bank made 29.8 percent of its loans in moderate-income tracts, compared to the demographics of 23.9 percent.

Small Farm Loans

The bank did not originate any farm loans in moderate-income tracts, although the percentage of farms located in these tracts was low for 2003 (1.4 percent) and 2004 (0.9 percent).

Distribution by Borrower Income and Revenue Size of Business and Farm: The distribution of loans by borrower income levels and by size of businesses and farms reflected good performance. The number and percentage of LMI families, high cost of housing relative to low incomes, performance context issues, size of business or farm, and aggregate performance in the assessment area were considered in the analysis.

Home Purchase Loans

The bank's level of 2003 home purchase loans to low-income borrowers was considered good. The analysis reflected that 17.4 percent of bank loans were made to low-income borrowers, compared to the aggregate of 9.0 percent and the demographics of 21.1 percent. During 2004, the bank's lending level (17.7 percent) and the area demographics (20.7 percent) were similar to the 2003 data. Gold's record of lending to moderate-income borrowers was 17.4 percent, compared to the aggregate of 21.9 percent and the demographics of 20.4 percent for 2003. Performance in 2004 improved, as the bank originated 23.5 percent of its home purchase loans in moderate-income tracts, compared to the demographics of 20.2 percent.

Refinance Loans

The distribution of lending by borrower income level for refinance loans was adequate for both years evaluated. During 2003, the bank originated 3.3 percent of its refinance loans to low-income borrowers, compared to the aggregate of 5.7 percent and the demographics of 21.1 percent. Lending performance to moderate-income borrowers was improved when reviewing the aggregate data. Gold made 11.7 percent of its refinance loans to moderate-

income borrowers, compared to the aggregate of 11.6 percent and the demographics of 20.4 percent.

During 2004, the bank originated 2.9 percent of its refinance loans to low-income borrowers, while the demographic data was substantially higher, at 20.7 percent. The 2004 distribution of lending to moderate-income borrowers (17.1 percent) was lower than the demographics (20.2 percent), but considered reasonable.

Home Improvement Loans

Gold's lending dispersion by borrower income level for home improvement loans was good. The aggregate lending levels for 2003 to both low- and moderate-income borrowers were identical, at 14.6 percent. The bank's lending to low-income borrowers was 21.4 percent, compared to the demographics of 21.1 percent. The performance for moderate-income borrowers was lower (14.3 percent), when compared to the demographics (20.4 percent).

Lending in 2004 indicated that 26.3 percent of the bank's home improvement loans were to low-income borrowers, compared to the demographics (20.7 percent). However, lending to moderate-income borrowers (10.5 percent) lagged behind the demographics (20.2 percent).

Small Business Loans

The overall distribution of loans to businesses of different sizes in 2003 was excellent. Loans to businesses with GAR of \$1 million or less (90.6 percent) exceeded the demographics (85.9 percent) and the aggregate (42.5 percent). These loans are further stratified by loan size. Over 78 percent of the 2003 loans to small businesses were in amounts of \$100,000 or less, which are amounts typically needed by smaller businesses.

Although aggregate data was not available for 2004, 83.3 percent of the bank's loans were to small businesses, compared to the demographics of 85.9 percent.

Small Farm Loans

All of Gold's loans to small farms during 2003 were to farms with GAR of \$1 million or less. This exceeds the aggregate performance (97.1 percent) as well as demographic data (97.3 percent) by a small margin. During 2004, the bank's lending to small farms equaled 55.0 percent, compared to the demographics of 97.3 percent.

Community Development Loans: Gold did not report any community development loans in the rural Kansas assessment area, although opportunities for community development lending in predominantly nonmetropolitan areas may be somewhat limited.

INVESTMENT TEST

In the rural Kansas assessment area, the bank had a poor level of qualified investment activity and grants. No reported qualifying debt or equity investments and only two qualified donations in the amount of \$1,000 were made by the bank during the evaluation period.

SERVICE TEST

Performance under the service test was adequate based primarily on the accessibility of delivery systems and the impact of branch closings.

Retail Services: Gold operates two banking offices in the area. One of the bank's offices is located in a moderate-income tract, and the other is in an upper-income tract. As previously mentioned, Gold divested eleven branches in northeast Kansas and two in eastern Kansas. The bank's offices and ATMs are accessible to all portions of the assessment area, and the wide array of services offered does not vary in a way that inconveniences certain portions of the assessment area or LMI individuals. Business hours are also adequate.

Community Development Services: The bank did not report any community development services for the area, although opportunities are limited due to the rural demographics of the assessment area.

STATE OF MISSOURI

CRA RATING FOR MISSOURI': "SATISFACTORY"

The lending test is rated: <u>High Satisfactory</u>
The investment test is rated: <u>Needs to Improve</u>
The service test is rated: <u>Low Satisfactory</u>

Major factors supporting the rating include:

- Favorable responsiveness to assessment area credit needs;
- Good geographic distribution of loans in the bank's assessment area;
- Reasonable distribution of loans among individuals of different income levels and businesses of different sizes;
- A poor level of qualified community development investments;
- An adequate level of qualified community development services; and,
- Generally accessible delivery systems to geographies of different income levels.

SCOPE OF EXAMINATION

For the state of Missouri rating, a full-scope analysis was conducted of Gold's only assessment area in the state. Accordingly, the statewide performance is discussed concurrently with the bank's performance in the rural Missouri assessment area. The scope of the evaluation for the state of Missouri was generally consistent with the overall scope of the evaluation for the entire institution, including an evaluation under the lending, investment and service tests. The lending data included the period from January 1, 2003 to September 30, 2004. For community development investments, the evaluation period was from October 28, 2002 to January 24, 2005.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MISSOURI

The bank has designated the St. Joseph MSA as the assessment area for its Missouri operations. Although the assessment area includes two counties, all banking operations are located in St. Joseph, Missouri, and consist of two branches with ATMs. On June 30, 2004, only 4.5 percent of the bank's \$2.4 billion in deposits was in the St. Joseph MSA assessment area. Accordingly, this area had a minor impact on the overall CRA rating. The bank's market share in the two county MSA ranks sixth (7.4 percent) out of 13 financial institutions in

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

the market. Since the prior evaluation, 13.1 percent of the number and 9.1 percent of the dollar amount of Gold's reported mortgage, business and agricultural loans were originated to borrowers in the St. Joseph MSA. The lending percentages, however, were diluted by the April 2004 merger of the Oklahoma branches and inclusion of Oklahoma's lending data for all of year 2004 as part of this evaluation.

DESCRIPTION OF THE BANK'S ASSESSMENT AREA

Labor, Employment and Economic Characteristics

The area's employment base relied heavily on service, government, and manufacturing industries. Among its largest employers were Heartland Health, Wal-Mart Stores, Wire Rope Corporation (fabricated wire products), American Family Insurance, Systems & Services Technologies, Altec Industries, and several smaller manufacturers and food producers. The MSA had a higher concentration of small nonfarm businesses than statewide. In 2003, 85.6 percent of area nonfarm businesses had gross revenues at or below \$1 million, compared to 84.3 percent statewide.

A continued weak manufacturing industry plagued the area economy and resulted in high unemployment and negative labor force growth. In 2002 and 2003, the unemployment rate held steady at 5.8 percent, which was higher than the statewide unemployment rates of 5.5 percent in 2002 and 5.6 percent in 2003. Area labor force growth was 0.2 percent in 2002 and -0.8 percent in 2003.

After two years of decreasing housing permit volume, the MSA's number of housing permits grew by 5.2 percent in 2002 and 37.0 percent in 2003. Housing permit growth affected both single- and multifamily units and indicated that housing credit demand had strengthened. Housing permit growth continued into the first half of 2004, with the number of MSA housing permits increasing by 35.6 percent from the second quarter of 2003 to the second quarter of 2004.

Income Characteristics

In 2000, the area's median family income (\$43,152) was 93.7 percent of the state as a whole (\$46,044), making it a middle-income area, overall. However, it contained smaller concentrations of low- and moderate-income families and had a lower family poverty rate than statewide. Families in the state as a whole had the following income distribution: 19.1 percent low-income, 18.8 percent moderate-income, 23.2 percent middle-income, and 38.9 percent upper-income. Statewide, 8.6 percent of families lived in poverty.

Housing Characteristics

Exhibit 5 displays the area's general housing characteristics. Area housing stock had large concentrations of older and single-family units, indicating a need for home improvement and

rehabilitation loans. In 2000, 75.0 percent of housing stock was single-family units and the median age of housing stock was 42 years with 40.9 percent of units built before 1950. Statewide, 71.5 percent of housing stock was single-family units; the median age of housing stock was 30 years; and, 23.6 percent of housing units were built before 1950. Owner occupancy was also slightly higher in the area than statewide, where 63.2 percent of housing stock was owner occupied.

Area housing was less expensive than statewide and was affordable for residents. In 2000, the area's housing affordability rate was .47 compared to a .43 affordability rate statewide. The statewide median housing value (\$86,900) was 15.7 percent higher than in the assessment area (\$75,100). Only 12.5 percent of area housing stock was valued at \$150,000 or higher, compared to 19.6 percent statewide.

The area's low vacancy rate indicated high housing demand. In 2000, 7.9 percent of area housing stock was vacant compared to a 10.1 percent vacancy rate statewide.

Exhibit 5 St. Joseph MSA Assessment Area Demographics											
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income				
	#	%	#	%	#	%	#	%			
Low-income	0	0.0	0	0.0	0	0.0	4,958	18.6			
Moderate-income	5	16.7	3,032	11.3	553	18.2	4,884	18.3			
Middle-income	20	66.6	18,410	68.9	1,424	7.7	6,398	23.9			
Upper-income	5	16.7	5,277	19.8	209	4.0	10,479	39.2			
Total											
Assessment Area	30	100.0	26,719	100.0	2,186	8.2	26,719	100.0			
	Housing			HOUSING	TYPES BY	TRACT					
	Units by	Ow	Owner-occupied		Rental		Vacant				
	Tract	#	%		#	%	#	%			
Low-income	0	0	0.0	0.0	0	0.0	0	0.0			
Moderate-income	6,459	2,528	9.2	39.1	2,872	44.5	1,059	16.4			
Middle-income	29,290	19,605	70.8	66.9	7,752	26.5	1,933	6.6			
Upper-income	7,487	5,540	20.0	74.0	1,533	20.5	414	5.5			
Total											
Assessment Area	43,236	27,673	100.0	64.0	12,157	28.1	3,406	7.9			
	Total Businesses by Tract		Businesses by Tract & Revenue Size								
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported				
	#	%	#	%	#	%	#	%			
Low-income	0	0.0	0	0.0	0	0.0	0	0.0			
Moderate-income	534	20.8	464	21.1	58	18.9	12	19.1			
Middle-income	1,605	62.5	1,366	62.1	200	65.1	39	61.9			
Upper-income	430	16.7	369	16.8	49	16.0	12	19.0			
Total				_							
Assessment Area	2,569	100.0	2,199	100.0	307	100.0	63	100.0			
Percentage of Total Businesses: 85.6 12.0											

Community Contacts

One community contact was conducted in the assessment area as part of the evaluation. The contact indicated that additional affordable housing programs would benefit the community, in addition to the traditional government guaranteed programs such as FHA and VA loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI

LENDING TEST

The overall rating for Gold's performance within the state of Missouri is high satisfactory. The bank's lending activity demonstrated a good responsiveness to retail credit needs of the assessment area. The geographic and borrower or size of business distributions were favorable, although the bank did not originate any qualified community development loans in the St. Joseph MSA. The data used to evaluate the bank's performance appear in the Appendix D tables. Lending activity is depicted in Table 1, geographic distribution in Tables 2-7, and borrower distribution in Tables 8-12.

Lending Activity: The bank's lending activity in Missouri was good. During the evaluation period for data reported under HMDA and the CRA, the bank originated 367 HMDA-related, 121 business and 5 farm loans. The majority of the weight for the lending test in the area will be placed on the bank's home mortgage and business lending. The bank's record of agricultural lending in this market, while considered, comprised only a minor portion of the weight in the performance, and accordingly, will not be discussed in detail.

Geographic Distribution: The overall distribution of HMDA-related and business lending reflected good penetration within geographies of all income levels, although there were no low-income tracts in this area. Performance context issues were considered, including lending opportunities reflected in the number and percentage of owner-occupied units, number and percentage of small businesses, and aggregate lending performance.

Home Purchase Loans

The geographic distribution of home purchase loans was good based on performance in the area's moderate-income tracts. During 2003, the bank originated 7.4 percent of its loans in moderate-income tracts, compared to the aggregate of 9.8 percent, and the demographics of 9.1 percent. The bank's 2004 performance was also good, with 8.2 percent of its home purchase loans originated in moderate-income tracts, compared to the demographics of 9.1 percent.

Refinance Loans

Gold's performance for mortgage refinance loans during 2003 was good. The bank originated 6.0 percent of its refinance loans in moderate-income tracts, compared to the aggregate of

7.0 percent and the demographics of 9.1 percent. Performance in 2004 was poor, as the bank did not originate any refinance loans in moderate-income tracts.

Home Improvement Loans

The bank's home improvement lending in moderate-income tracts in 2003 was good. Gold originated 33.3 percent of its home improvement loans in moderate-income tracts, compared to the aggregate of 12.6 percent and the demographics of 9.1 percent. The bank's performance in 2004 declined, however, as no home improvement loans were originated in moderate-income tracts.

Small Business Loans

The geographic distribution of small business loans was favorable in moderate-income tracts. For 2003, the bank's penetration of loans in moderate-income tracts was 15.3 percent, which was above the aggregate of 14.8 percent and lower than the demographics of 20.8 percent. In 2004, performance was somewhat lower as the bank made 12.9 percent of its loans in moderate-income tracts, compared to the demographics of 20.8 percent.

Distribution by Borrower Income and Revenue Size of Business: The distribution of loans by borrower income levels and by size of business reflected good performance. The number and percentage of LMI families, high cost of housing relative to low incomes, performance context issues, size of business, and aggregate performance in the assessment area were considered in the analysis.

Home Purchase Loans

The bank's level of 2003 home purchase loans to low-income borrowers was considered good. Lending data reflected that 16.2 percent of bank loans were made to low-income borrowers, compared to the aggregate of 13.8 percent and the demographics of 18.6 percent. Lending to moderate-income borrowers during 2003 was excellent. The bank originated 26.5 percent of its home purchase loans to moderate-income borrowers, exceeding the aggregate (21.3 percent) and the demographics (18.3 percent). During 2004, the bank's lending to low-income borrowers (20.4 percent) compared to the demographics (18.1 percent) was good. The distribution to moderate-income borrowers for 2004 was also similar. The bank made 26.5 percent of the loans in this category to moderate-income borrowers, compared to the demographics of 18.0 percent.

Refinance Loans

The distribution of lending by borrower income level for refinance loans was favorable for 2003, when the bank originated 8.5 percent of its refinance loans to low-income borrowers, compared to the aggregate of 7.2 percent and the demographics of 18.6 percent. Gold made 19.5 percent of its refinance loans to moderate-income borrowers, compared to the aggregate of 16.0 percent and the demographics of 18.3 percent.

During 2004, the bank originated 8.1 percent of its refinance loans to low-income borrowers, and 5.4 percent to moderate-income borrowers, which were lower than the demographics at 18.1 percent and 18.0 percent, respectively.

Home Improvement Loans

Gold's lending dispersion by borrower income level for home improvement loans was good. The bank's lending to low-income borrowers was 33.3 percent, compared to the demographics of 18.6 percent and aggregate of 12.6 percent. The bank did not, however, originate any home improvement loans to moderate-income borrowers during 2003.

Lending in 2004 indicated improved performance. Bank lending to low-income borrowers was 16.7 percent compared to the demographics of 18.1 percent. Lending to moderate-income borrowers (33.3 percent) was even more favorable when compared to the demographic figure (18.0 percent).

Small Business Loans

The distribution of loans to businesses of different sizes in 2003 was strong. Loans to businesses with GAR of \$1 million or less (86.4 percent) exceeded the demographics (85.6 percent) and the aggregate (50.2 percent). These loans are further stratified by loan size. Over 81.0 percent of the 2003 loans to small businesses were in amounts of \$100,000 or less, which are typically amounts required by smaller business entities.

Although aggregate data was not available for 2004, 83.9 percent of the bank's loans were to small businesses, compared to the demographics of 85.6 percent.

Community Development Loans: Gold had one community development loan for \$41,000 in the St. Joseph MSA that was for affordable housing. It is important to note that opportunities for community development lending in metropolitan areas that are not highly populated are limited.

INVESTMENT TEST

Gold had a poor level of community development investment, donation, and grant activity in the St. Joseph MSA. No reported qualifying debt or equity investments and only two qualified donations in the amount of \$2,000 were made by the bank during the evaluation period.

SERVICE TEST

Performance under the service test was adequate based primarily on the accessibility of delivery systems and services offered.

Retail Services: Both of the bank's offices are located in upper-income tracts. The bank's offices and ATMs are accessible to all portions of the assessment area, and the wide array of services offered does not vary in a way that inconveniences certain portions of the assessment area or LMI individuals. Business hours are also adequate.

Community Development Services: The bank reported one community development service for the area that was for economic development purposes, which exhibited a poor responsiveness to community development needs. Opportunities for community development service activity in the area should be prevalent.

STATE OF OKLAHOMA

CRA RATING FOR OKLAHOMA: "SATISFACTORY"

The lending test is rated: <u>High Satisfactory</u>
The investment test is rated: <u>Low Satisfactory</u>
The service test is rated: <u>Low Satisfactory</u>

Major factors supporting the rating include:

- Good responsiveness to assessment area credit needs;
- Good geographic distribution of loans in the bank's assessment area;
- Reasonable distribution of loans among individuals of different income levels and businesses of different sizes;
- An adequate level of qualified community development investments;
- An adequate level of qualified community development services; and,
- Generally accessible delivery systems to geographies of different income levels.

SCOPE OF EXAMINATION

The Oklahoma branches were merged into Gold during April 2004. Accordingly, the evaluation of the bank's CRA performance in the state of Oklahoma and the individual assessment areas will only include the bank's 2004 lending data. Because aggregate data was not available for 2004, comparisons will primarily be made to area demographic data. For the state of Oklahoma rating, a full-scope analysis was conducted for two of the three assessment areas as follows:

- 1. MSA 5880 (Oklahoma City, Oklahoma) consisting of Canadian, Cleveland, Logan and Oklahoma Counties, or four of the six MSA counties for 2003.
- 2. MSA 8560 (Tulsa, Oklahoma) consisting of Creek, Osage, Rogers, Tulsa and Wagoner Counties.

A limited review was conducted for the bank's rural Oklahoma assessment area, which consisted of Garfield and Kingfisher Counties. Garfield County was formerly classified as an MSA (Enid, Oklahoma), until the reconfiguration of the nation's MSAs as part of the outcome of the 2000 census data compilation. The changes to the MSAs were released to the public in July 2003 by the Census Bureau.

The scope of the evaluation for Oklahoma was generally consistent with the overall scope of the analysis for the institution, including an evaluation under the lending, investment, and service tests. The lending data evaluated included the period from January 1, 2004 to September 30, 2004. For community development loans, investments, and services, the evaluation period was January 1, 2004 through January 24, 2005.

Conclusions regarding the bank's CRA performance in the state of Oklahoma were predominantly based on analyses of the Oklahoma City and Tulsa MSA assessment areas. Together, these areas had a majority of the bank's deposits, branches, HMDA-related, small business and small farm loans, population, LMI tracts, owner-occupied housing units and business establishments. Therefore, a limited review was conducted in the bank's rural assessment area that consisted of Garfield and Kingfisher Counties.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN OKLAHOMA

The bank operates 35.7 percent of its branches, which held approximately 22.4 percent of all bank deposits, within its Oklahoma markets. Oklahoma had approximately 27.2 percent of the total HMDA-related, small business and small farm lending originated during the evaluation period, by number of loans. According to the FDIC Market Share Report as of June 30, 2004, Gold's deposit market share was 1.9 percent, and the bank ranked tenth among 115 financial institutions operating in the three assessment areas. The bank operates 10 full-service locations in Oklahoma and faces strong competition from several local and regional financial institutions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TEST IN OKLAHOMA

Gold's CRA performance in the Oklahoma assessment areas was weighted according to deposit and lending market share, which was the largest when compared to the states of Kansas and Missouri, but second to the Kansas City MSA.

LENDING TEST

Gold's performance with respect to the lending test in the state is rated high satisfactory. The full-scope reviews of the Oklahoma City and Tulsa MSAs revealed that the geographic, borrower and size of business distributions were noteworthy. The limited review of the rural Oklahoma assessment area concluded that the lending test in this area was not as strong as that noted in the MSA areas, although it was still considered adequate. A more in-depth discussion of performance in each assessment area is contained in other sections that follow in this report.

The data used to evaluate the bank's performance is not in the Appendix D tables due to the 2004 evaluation period used and lack of aggregate data. However, lending activity is depicted in the discussion of each assessment area.

Lending Activity: Overall, Gold's lending performance in the state is considered favorable. The bank's lending activity reflected a favorable responsiveness to retail credit needs of the assessment area in relation to the bank's capacity and performance context issues. The bank originated 1,018 HMDA-related, small business and small farm loans during the evaluation period and within its assessment area totaling approximately \$107 million.

Geographic and Borrower Distribution: The overall distribution of HMDA, small business, and small farm loans reflected good penetration in LMI geographies. Overall, the bank's lending performance was good in both MSA assessment areas and was notably strong for mortgage refinance and home improvement loans. Business lending by income level of geography was also good. In addition, the bank originated 108 farm loans in the Oklahoma City MSA during 2004, and the tract distribution was considered reasonable.

The bank's distribution of home mortgage loans among borrowers of different income levels and small business and farms with GAR of \$1 million or less was adequate, although not as favorable as the geographic distribution. This conclusion was based on the performance in all areas, although in several instances the bank's performance was less than the demographics. As previously mentioned, 2004 aggregate lending data was not available to use as a comparative benchmark for the bank's lending performance.

Community Development Lending: The bank's community development lending in the state of Oklahoma during the evaluation period was poor, although the bank's performance under the lending test was still considered satisfactory. Details of community development lending are further explained in the discussion of each assessment area.

INVESTMENT TEST

Gold's performance under the investment test in the state of Oklahoma is rated low satisfactory. The bank's level of qualified investments exhibited an adequate responsiveness to community development needs. Investment activity in the Tulsa MSA was poor, although it was sufficient in the Oklahoma City MSA. The strongest investment test performance in Oklahoma was noted in the rural assessment area, which received a limited-scope review. The above-average performance in the rural assessment area was considered in the investment test performance for the entire state. A more in-depth discussion of performance in each individual assessment area is contained in other sections of this report that follow.

At this examination, three qualified investments and one donation totaled approximately \$2.7 million in the state of Oklahoma. Two investments were directed towards affordable housing; the other was to revitalize and stabilize a community. The primary purpose of the sole donation was for community services.

The bank did not offer highly complex investments. A majority of the dollar amount of investment activity in the state of Oklahoma was for a local school bond in which a majority of students were enrolled in the free and reduced lunch program. The bank exhibited adequate responsiveness to community development needs.

SERVICE TEST

Gold's performance under the service test for the state is rated low satisfactory, based on similar performance in the two Oklahoma MSA assessment areas. This conclusion was based on the accessibility of delivery systems, the affect of branch closings, and the level of community development services. Two of the bank's ten offices (20 percent) in the state are located in LMI areas. All banking offices are readily accessible to all portions of the assessment areas. The wide array of services offered and business hours do not vary in a way that inconveniences certain portions of the assessment areas or LMI individuals. A more in-depth discussion of performance in each assessment area is contained in other sections of this report.

The bank reported two community development services in the state, and both were directed towards community services. One service benefited the Oklahoma MSA and the other benefited the rural Oklahoma assessment area. There were no community development services reported in the Tulsa MSA.

METROPOLITAN AREA

(Full Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 5880 (OKLAHOMA CITY, OKLAHOMA)

The bank designated four of the six Oklahoma City MSA counties as an assessment area that includes Canadian, Cleveland, Logan and Oklahoma Counties. Gold operates three branch offices with ATMs in the area, comprising 30 percent of the bank's offices in the state and 10.7 percent of all Gold offices that were reviewed as part of this evaluation. The MSA offices held \$178 million in deposits, or 33.6 percent of the bank's total branch deposits in the state, as of June 30, 2004. According to the FDIC Market Share Report of the same date, the bank's deposit market share for the Oklahoma City MSA was 1.3 percent and ranked 15 among 62 financial institutions in the assessment area.

DESCRIPTION OF THE ASSESSMENT AREA

Labor, Employment and Economic Characteristics

Services, government and retail industries were vital to the area economy. At year-end 2003, service industries comprised 39.9 percent of the MSA employment base, followed by government industries (20.3 percent) and retail trade (11.4 percent). Among its largest employers were Tinker Air Force Base, University of Oklahoma, Wal-Mart Stores, Integris Health, University of Oklahoma Health Center, and Braum's Ice Cream Stores.

The assessment area had generally the same concentration of small nonfarm businesses as MSA-wide. D&B data revealed that 84.5 percent of area nonfarm businesses had GAR at or below \$1 million, compared to 84.7 percent for the entire Oklahoma City MSA.

MSA unemployment rates increased annually from 2.4 percent in 2000 to 5.1 percent in 2004 but remained below statewide unemployment rates. In 2003, the statewide unemployment rate was 5.7 percent. Nonetheless, there were indications that area unemployment was decreasing. The MSA unemployment rate decreased quarterly from the second quarter of 2003 to the second quarter of 2004.

Income Characteristics

In 2000, the area's median family income (\$45,688) was 101.4 percent that of the MSA as a whole (\$45,059), making it a middle-income area overall. It had somewhat smaller concentrations of low- and moderate-income families and families living in poverty than MSA-wide. Families in the MSA as a whole had the following income distribution: 20.1 percent low-income; 18.2 percent moderate-income; 21.6 percent middle-income; and 40.1 percent upper-income. In addition, 10.0 percent of MSA-wide families lived in poverty.

Housing Characteristics

Exhibit 6 displays the area's general housing characteristics. Area housing stock was comparable to that in the MSA as a whole. However, it had slightly higher concentrations of multifamily and rental units. In 2000, 16.3 percent of area housing units were multifamily units compared to 15.3 percent MSA-wide and 10.5 percent statewide. MSA-wide and statewide, 32.2 percent and 28.0 percent, respectively, of housing stock was rental units.

The median age of assessment area housing stock was the same as MSA-wide and statewide (28 years). However, the area had a smaller stock of older housing units. In 2000, 14.5 percent of area housing stock was built before 1950 compared to 14.9 percent MSA-wide and 18.0 percent statewide.

Area housing was more expensive than in the MSA as a whole and statewide. In 2000, the median area housing value was \$78,191, compared to \$76,900 for the entire MSA and \$67,700 statewide. Of total area housing units, 13.3 percent were valued over \$149,000 compared to 12.8 percent for the MSA as a whole and 10.7 percent statewide. Because of its larger stock of expensive units, the area had a somewhat lower housing affordability ratio (.46) than MSA-wide (.47) and statewide, where an affordability ratio of .49 was noted.

Rental housing was also less affordable for area residents than for residents MSA-wide and statewide. The area's median gross rent was \$490, and 15.0 percent of rental units cost over \$700 in 2000. MSA-wide, the median gross rent was \$487, and 14.4 percent of units cost over \$700; statewide, the median gross rent was \$456, and 11.6 percent of units cost over \$700.

	Oklahoma	City MSA	A A:		ibit 6 ent Area	a Demograp	ohics fo	r 2004			
Income Categories	Tra Distrib			Families Tract Inc		Families < I Level as Families by	% of	Families by Family Income			
	#	%		#	%	#	%	#	%		
Low-income	23	7.4		7,462	2.9	2,751	36.9	50,945	19.6		
Moderate-	91	29.3	29.3		24.5	12,063	18.9	46,151	17.8		
income											
Middle-income	111	35.7	9	8,409	37.9	7,922	8.1	55,720	21.5		
Upper-income	81	26.0	8	39,940	34.7	2,976	3.3	106,750	41.1		
Tract not											
Reported	5	1.6		0	0.0	0	0.0	0	0.0		
Total											
Assessment											
Area	311	100.0	25	59,566	100.0	25,712	9.9	259,566	100.0		
	Housing				Hous	ng Types by	Tract	, , , , , , , , , , , , , , , , , , , ,			
	Units by	Ov	vner	-Occupie	d	Renta	al	Vaca	ant		
	Tract	#		%		#	%	#	%		
Low-income	15,804	4,856	;	1.9	30.7	8,198	51.9	2,750	17.4		
Moderate-											
income	121,217	51,706	;	20.8	42.7	54,838	45.2	14,673	12.1		
Middle-income	162,698	97,242		39.1	59.8	51,849	31.9	13,607	8.4		
Upper-income	127,820	94,953	;	38.2	74.3	26,081	20.4	6,786	5.3		
Tract not											
Reported	200	0		0.0	0.0	170	85.0	30	15.0		
Total											
Assessment											
Area	427,739	248,757	,	100.0	58.2	141,136	33.0	37,846	8.8		
	Total Day	olinoonaa bi			Busi	nesses by Tra	ct & Rev	enue Size			
		sinesses b ract	У		han or = ⁄lillion	Over \$1	Million	Revenu Repo			
	#	%		#	%	#	%	#	%		
Low-income	1,448	5.5		1,093	4.9	310	9.2	45	6.3		
Moderate- income	6,476	24.5		5,388	24.2	943	28.0	145	20.4		
Middle-income	9,968	37.8		8,490	38.1	1,167	34.6	311	43.7		
Upper-income	7,725	29.3		6,762	30.3		23.3	177	24.9		
Tract not	, -			,							
reported	766	2.9		568	2.5	165	4.9	33	4.7		
Total Assessment											
Area	26,383	100.0		22,301	100.0	3,371	100.0	711	100.0		
		e of Total E			84.5		12.8		2.7		

Community Contacts

Two community contacts conducted in conjunction with the public evaluations of two unrelated financial institutions were reviewed to determine if unmet credit needs exist in the assessment area. One contact discussed the need for more involvement in Section 8 Home Ownership

Program loans. The other contact indicated a need for additional small business and affordable housing loans, as well as educational programs for home ownership and small business development.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 5880 (OKLAHOMA CITY, OKLAHOMA)

LENDING TEST

The bank's performance with respect to the lending test in the Oklahoma City MSA was favorable.

Lending Activity: Gold's responsiveness to the Oklahoma City MSA's retail credit needs was good. Lending activity in the area represented 39.9 percent of the total HMDA-related, small business, and small farm originations for the state of Oklahoma.

Geographic Distribution: The geographic distribution of HMDA-related and small business loans reflected good penetration. Performance context issues, including lending opportunities reflected in the number and percentage of owner-occupied units, businesses, and farms, were considered.

Geographic Distribution – Oklahoma City MSA Assessment Area										
	Total #	Low-Income	Tracts	Moderate-Income Tracts						
Product	of Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans					
Home Purchase	19	1.9	0.0	20.8	5.3					
Refinance	60	1.9	8.3	20.8	33.3					
Home Improvement	17	1.9	5.9	20.8	17.7					
Product	Total # of Loans	% of Businesses or Farms	% Bank Loans	% of Businesses or Farms	% Bank Loans					
Small Business	202	5.5	5.0	24.5	19.3					
Small Farm	108	2.0	0.0	10.0	6.5					

Home Purchase Loans

The geographic distribution of home purchase loans across geographies of different income levels reflected poor penetration in LMI tracts. During 2004, the bank did not report any home purchase loans originated in the area's low-income tracts, and only 5.3 percent were made in moderate-income tracts, compared to the demographics of 20.8 percent. While considered unfavorable, the bank's performance within the refinance and home improvement categories carried the majority of the weight based on the number of originations combined with the high level of performance.

Refinance Loans

Refinance lending across geographies of different income levels reflected excellent penetration in LMI geographies. Gold's performance in low-income geographies (8.3 percent) was favorable and surpassed the demographics (1.9 percent). The bank's performance in moderate-income geographies (33.3 percent) was also excellent, when compared to the area demographics (20.8 percent).

Home Improvement Loans

The distribution of home improvement lending across geographies of different income levels reflected excellent penetration. The bank's performance in low-income tracts (5.9 percent) exceeded the demographics (1.9 percent) by a considerable margin. Performance in moderate-income tracts (17.7 percent) was lower than the demographics (20.8 percent), but still favorable when considering the bank operates three branches in the four counties that comprise the Oklahoma City MSA assessment area.

Small Business Loans

The geographic distribution of small business loans was good in LMI geographies. Gold's performance was favorable in low-income geographies (5.0 percent) and just slightly below the demographics (5.5 percent). Performance in moderate-income geographies (19.3 percent) was below the demographics (24.5 percent), but still good when considering the bank's market share and branch distribution within the assessment area.

Small Farm Loans

During 2004, the bank originated 108 farm loans in the area, which ranked second to the 150 agricultural loans that Gold made in the rural Oklahoma assessment area. The bank did not originate any small farm loans in low-income tracts, although the demographics indicated that only 2.0 percent of the area's farms were located in those areas. Performance in the moderate-income tracts was fair at 6.5 percent, compared to the demographics of 10.0 percent.

Distribution by Borrower Income and Revenue Size of the Business and Farm: The distribution of loans across borrower income levels reflected adequate performance. The number and percentage of LMI families, high cost of housing relative to low incomes, performance context issues, and size of businesses and farms in the assessment area were considered in the analysis.

Borrower Dist	ribution	- Oklahoma	City MS	A Asses	smen	Borrower Distribution – Oklahoma City MSA Assessment Area											
	Total #	Low-Inco Borrowe		Moderate-Income Borrowers													
Product	of Loans	% of Families	% Bank Loans	% of Famili		% Bank Loans											
Home Purchase	19	19.6	5.3	17.8	}	21.1											
Refinance	60	19.6	1.7	17.8	1	1.7											
Home Improvement	17	19.6	0.0	17.8		5.9											
Product	Total #	Businesses/ with Revenue Million or	es of \$1			Bus	al Amount usiness or ze										
	Loans	% of Businesses or Farms	% Bank Loans	\$100M or less	>\$100 to \$250		>\$250M to \$500M										
Small Business	202	84.5	59.4	137	42		23										
Small Farm	108	94.4	82.4	92	12		4										

Home Purchase Loans

Gold's distribution of home purchase loans to LMI borrowers exhibited adequate performance. The bank's distribution to low-income borrowers (5.3 percent) was significantly below the demographics (19.6 percent). However, the bank's performance in lending to moderate-income borrowers (21.1 percent) exceeded the demographics (17.8 percent).

Refinance Loans

The bank's level of refinance loans to LMI borrowers in the area will not receive major consideration, as 29 of the 60 refinance loans originated during 2004 did not have reported incomes. Gold's performance of lending to LMI borrowers of 1.7 percent to both low- and moderate-income borrowers was well below the demographics of 19.6 percent and 17.8 percent, respectively. The percentages increase to 3.2 percent for both income levels when factoring out the number of loans with unreported incomes.

Home Improvement Loans

The bank's distribution of home improvement loans will not be heavily weighted in the overall analysis. Similar to refinance loans originated in the Oklahoma City MSA assessment area, 4 of the 17 home improvement loans did not have income figures reported. Of the 13 loans with reported incomes, the bank did not originate any to low-income borrowers and only 5.9 percent to moderate-income borrowers, compared to the demographics of 17.8 percent.

Small Business Loans

The overall distribution of loans to businesses of different sizes was good. The bank's performance (59.4 percent) was less than the percentage of businesses with GAR of \$1 million or less (84.5 percent). However, there were no aggregate lending figures to compare the bank's level of lending to its peers. The aggregate lending data provides a better comparison because not all businesses have the financial capability to qualify for traditional bank loans. The aggregate data reflects the market demand for credit from qualified borrowers. Furthermore, 67.8 percent of the bank's loans were in amounts of \$100,000 or less, which are amounts typically needed by smaller business entities.

Small Farm Loans

Gold's level of lending to farms of different sizes was fair at 82.4 percent, compared to the demographics of 94.4 percent. In addition, 85.2 percent of farm loans were in amounts of \$100,000 or less, which are amounts typically needed by small farms.

Community Development Lending: Gold did not report any community development loans in the Oklahoma City MSA.

INVESTMENT TEST

Gold's investment test performance is considered adequate. In the Oklahoma City MSA, the bank reported one qualifying investment totaling \$504,000. The investment was a collateralized mortgage obligation (CMO) for three home loans to low-income borrowers and three to moderate-income borrowers. The bank also made one donation totaling \$51,000 to a council on economic education.

SERVICE TEST

Performance under the service test was adequate based on the accessibility of delivery systems and the impact of branch closings.

Retail Services: Gold operates three banking offices and one cash dispending ATM in this Oklahoma City MSA. One of the offices is located in a moderate-income tract, and the remaining two branches are in middle-income tracts. Banking offices are relatively accessible to all portions of the assessment area and the wide array of services offered do not vary in a way that inconveniences certain portions of the assessment area or LMI individuals. Business hours are also adequate.

Community Development Services: Gold did not report any qualifying community development services in the area.

METROPOLITAN AREA

(Full Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 8560 (TULSA, OKLAHOMA)

The bank designated the Tulsa MSA as its assessment area, which included Creek, Osage, Rogers, Tulsa and Wagoner Counties. These five counties comprised the entire MSA in 2003. When the nation's MSAs were reconfigured as part of the year 2000 census, Okmulgee and Pawnee Counties were added to the original five MSA counties effective January 1, 2004, although the bank did not add these two counties to its assessment area.

Gold operates three branch offices in the Tulsa MSA, comprising 30 percent of the bank's offices in the state and 10.7 percent of all Gold offices that were reviewed as part of this evaluation. One of the offices is located in a moderate-income tract and does not have an automated teller machine (ATM). The other two offices, equipped with ATMs, are located in upper-income tracts. The offices held \$180 million in deposits, or 33.8 percent of the bank's total branch deposits in the state, as of June 30, 2004. According to the FDIC Market Share Report of the same date, the bank's deposit market share for the Tulsa MSA was 1.4 percent, and the bank ranked 16 among 61 financial institutions in the area.

DESCRIPTION OF THE ASSESSMENT AREA

Labor, Employment and Economic Characteristics

Service, retail and manufacturing industries were the MSA's primary employment sectors. In 2003, service industries comprised 39.6 percent of the MSA employment base, followed by manufacturing industries (12.0 percent) and retail trade (11.3 percent). Among the MSA's largest employers were the following: AEP Public Service Company; American Airlines (maintenance, reservations); Boeing Corp.; Blue Cross and Blue Shield Association; several health and medical service companies, including St. John Medical Center, Saint Francis Hospital and Hillcrest Healthcare System; MCI; The Williams Companies (natural gas transmission); and Kwikset Corporation (hardware manufacturers). Financial activities grew by 6.0 percent from the second quarter of 2003 to the second quarter of 2004 and were the MSA's fastest growing employment sector over that period.

The MSA economy contracted in 2002 and 2003 as payroll employment decreased and unemployment burgeoned. Total payroll employment decreased by 2.2 percent in 2002 and 4.0 percent in 2003. The unemployment rate increased from 3.4 percent in 2001 to 4.9 percent in 2002 and 6.5 percent in 2003. MSA unemployment was higher than statewide, where unemployment was 4.5 percent in 2002 and 5.7 percent in 2003. Another significant economic factor was the area's decreasing labor force. In 2003, the labor force decreased by 1.4 percent compared to 0.1 percent labor force growth statewide. The labor force has decreased quarterly over the past two years.

The MSA housing market also suffered, though there were signs of a recovery. MSA housing permit growth was 7.6 percent in 2002 and -4.8 percent in 2003; however, all of the 2003 decrease was in multifamily permits. Single-family housing permits increased by 5.0 percent in 2003. During the first two quarters of 2004, the MSA's number of single-family housing permits grew substantially. From the second quarter of 2003 to the second quarter of 2004, the number of MSA single-family housing unit permits increased by 18.2 percent.

The MSA's concentration of small nonfarm businesses was slightly lower than statewide. In 2003, 83.3 percent of area nonfarm businesses had GAR at or below \$1 million, compared to the statewide distribution of 85.5 percent.

Income Characteristics

Overall, the area was middle income and in 2000, its median family income (\$46,479) was 114.2 percent that of the statewide median family income (\$40,709). The area contained smaller concentrations of low- and moderate-income families and families living in poverty than statewide. Exhibit 7 displays the area's family income distribution. Statewide, families had the following income distribution: 20.1 percent low-income; 18.2 percent moderate-income; 21.7 percent middle-income; and, 40.0 percent upper-income. In addition, 11.2 percent of families in the state lived in poverty.

Housing Characteristics

Area housing stock had higher concentrations of multifamily units than statewide. Of total area housing stock, 15.7 percent was multifamily units, compared to 10.5 percent statewide.

Area housing stock was also younger than statewide, which could be an indication of recent housing development or the area's smaller concentration of mobile homes. In 2000, the median age of area housing stock was 27 years, and 15.0 percent of housing stock was built before 1950. Statewide, the median age of housing stock was 28 years, and 18.0 percent of housing stock was built before 1950. Of area housing stock, 7.8 percent was mobile homes compared to 10.7 percent mobile homes statewide. Mobile homes usually have shorter use cycles than traditional housing stock.

Area housing demand was high, and affordable housing development was in demand. In 2000, area housing unit vacancy was substantially lower than the statewide vacancy rate (11.4 percent), and the median value of area housing stock (\$81,900) was 21.0 percent higher than in the state as a whole (\$67,700). As a result, despite its higher income levels, the area's housing affordability ratio of .46 was lower than the .49 ratio for the entire state.

	Tulsa N	/ISA Asse		thibit 7 Area De	emographic	s for 20	04					
Income Categories	Distribu	Tract Distribution		ies by ncome	Level Families	< Povert as % of by Tract	Family	ilies by / Income				
	#	% #		%	#	%	#	%				
Low-income	7	2.8	3,612	1.7	1,483	41.		19.2				
Moderate-income	57	22.8	43,165	19.9	7,563	17.5	39,069	18.0				
Middle-income	107	42.8	102,560	47.3	7,702	7.5	46,817	21.6				
Upper-income	79	31.6	67,361	31.1	2,025	3.0	89,154	41.2				
Total												
Assessment	250	100.0	216,698	100.0	18,773	8.7	7 216,698	100.0				
Area												
	Housing HOUSING TYPES BY TRACT											
	Units by	Owr	er-Occupi	ied	Renta	ı	Vaca	ant				
	Tract	#	%		#	%	#	%				
Low-income	7,013	2,093	1.0	29.8	3,968	56.6	952	13.6				
Moderate-income	76,192	37,144	17.6	48.8	31,131	40.9	7,917	10.4				
Middle-income	160,909	101,779	48.2	63.3	47,260	29.4	11,870	7.4				
Upper-income	97,301	70,101	33.2	72.0	22,056	22.7	5,144	5.3				
Total	044 445	044 447	400.0	64.0	404.445	20.0	05.000	7.0				
Assessment	341,415	211,117	100.0	61.8	104,415	30.6	25,883	7.6				
Area							0:					
	Total Busir	esses by	Less Th		sinesses by T	ract & Re	venue Size					
	Tra	ct	\$1 Mi		Over \$1 M	illion	Revenue No	t Reported				
	#	%	#	%	#	%	#	%				
Low-income	318	1.4	257	1.4	57	1.9	4	0.6				
Moderate-income	5,478	24.5	4,372	23.4	967	31.2	139	21.7				
Middle-income	9,575	42.8	8,132	43.6	1,140	36.8	303	47.4				
Upper-income	7,017	31.3	5,891	31.6	932	30.1	194	30.3				
Total												
Assessment	22,388	100.0	18,652	100.0	3,096	100.0	640	100.0				
Area	•				•							
	Percentage o	f Total Bus	inesses:	83.3		13.8		2.9				

Community Contacts

Two community contacts were conducted in the Tulsa MSA during the public evaluation of an unrelated financial institution. The contacts indicated a need for affordable housing directed towards low- and moderate-income borrowers and a high demand for public housing and Section 8 housing. Opportunities for small business development lending were also identified.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 8560 (TULSA, OKLAHOMA)

LENDING TEST

Gold Bank's performance with respect to the lending test in the Tulsa MSA was good.

Lending Activity: The bank's responsiveness to the retail credit needs in the Tulsa MSA was good. Lending activity in the MSA represented 25.2 percent of the total HMDA-related and small business loan originations in the state.

Geographic Distribution: The geographic distribution of HMDA-related and small business loans reflected favorable penetration in LMI geographies. Performance context issues, including lending opportunities reflected in the number and percentage of owner-occupied units and businesses, were considered. As previously mentioned, only 2004 lending data was considered as part of the evaluation. Accordingly, aggregate lending data was not available to make comparisons of the bank's performance in relation to its peers.

Geographic Distribution – Tulsa MSA Assessment Area										
Product	Total # of	Low-Income	Tracts	Moderate-Income Tracts						
	Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans					
Home Purchase	43	1.0	2.3	17.6	39.5					
Refinance	57	1.0	1.8	17.6	47.4					
Home Improvement	6	1.0	0.0	17.6	50.0					
Product	Total # of Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans					
Small Business	171	1.4	0.6	24.5	15.8					

Home Purchase Loans

The distribution of home purchase loans across geographies of different income levels reflected excellent penetration in LMI geographies. The bank's performance in low-income geographies (2.3 percent) was significantly above the demographics (1.0 percent). Moderate-income performance was also exceptional. The bank made 39.5 percent of its loans in moderate-income tracts, compared to the demographics of 17.6 percent.

Refinance Loans

Refinance lending across geographies of different income levels reflected excellent penetration in LMI geographies. The bank's performance in low-income geographies was noteworthy (1.8 percent) and above the demographics (1.0 percent). The bank's performance in moderate-income geographies (47.4 percent) nearly tripled the demographics (17.6 percent).

Home Improvement Loans

The distribution of home improvement lending across geographies of different income levels reflected good penetration in moderate-income tracts. The bank did not originate any home improvement loans in low-income geographies, but the demographics (1.0 percent) were also low. The bank's performance in moderate-income geographies was excellent (50.0 percent), far exceeding the demographics (17.6 percent).

Small Business Loans

The geographic distribution of small business loans was adequate in LMI geographies. Gold's performance in low-income geographies (0.6 percent) was lower than the demographics (1.4 percent). The bank's performance in the moderate-income tracts (15.8 percent) was also lower than the demographics (24.5 percent).

Distribution by Borrower Income and Revenue Size of the Business: The distribution of loans across borrower income levels reflected adequate performance. The number and percentage of LMI families, high cost of housing relative to low incomes, performance context issues and size of businesses in the assessment area were considered in the analysis.

Borrower/Size of Business Distribution – Tulsa MSA Assessment Area											
	Total #	Low-Inco Borrowe		Moderate-Income Borrowers							
Product	of Loans	% of Families	% Bank Loans	% of Famili		% Bank Loans					
Home Purchase	43	19.2	0.0	18.0	1	4.7					
Refinance	57	19.2	1.8	18.0)	1.8					
Home Improvement	6	19.2	16.7	18.0)	16.7					
Product	Total #	Businesses/ with Revenue Million or	es of \$1	Loans by Original Amount Regardless of Business Size							
Troduct	Loans	% of Businesses	% Bank Loans	\$100M or less	>\$100M to \$250M	>\$250M to \$500M					
Small Business	171	83.3	59.1	98	29	44					

Home Purchase Loans

Although Gold was active in LMI geographies, as discussed in the previous section, it did not originate any home purchase loans to low-income borrowers even though the percentage of low-income families in the Tulsa MSA was 19.2 percent. The distribution to moderate-income borrowers (4.7 percent) was significantly below the demographics (18.0 percent).

Refinance Loans

The bank's level of refinance loans to LMI borrowers in the area was also low. Lending to LMI borrowers was 1.8 percent for both classifications, compared to the demographics of 19.2 percent and 18.0 percent to low- and moderate-income borrowers, respectively. Although the performance is considered weak, it should be noted that income figures were not available for 29.8 percent of the borrowers that received refinance loans from the bank, which dilutes the distribution for all of the income categories.

Home Improvement Loans

The bank's distribution of home improvement loans to low-income borrowers (16.7 percent) was below the demographics (19.2 percent). The distribution was identical for moderate-income borrowers (16.7 percent), although the demographics were 18.0 percent. While lending to both income categories was lower than the demographics, the performance is still considered good.

Small Business Loans

The overall distribution of loans to businesses of different sizes was adequate. The bank's performance (59.1 percent) was less than the percentage of businesses with GAR of \$1 million or less (83.3 percent). However, there were no aggregate lending figures available to compare with the bank's level of lending. As stated throughout this evaluation, the aggregate lending data provides a better comparison because not all businesses have the financial capability to qualify for traditional bank loans. The aggregate data reflects the market demand for credit from qualified borrowers. Furthermore, 57.3 percent of the bank's loans were in amounts of \$100,000 or less, which are amounts typically needed by smaller business entities.

Community Development Lending: The bank's lending in this category was weak. One community development loan for \$706,000 to purchase and rehabilitate two 21-unit apartment complexes was reported by the bank.

INVESTMENT TEST

The bank's performance under the investment test was poor. Gold had one investment that was part of a CMO in the amount of \$77,000 in the Tulsa MSA. There were no qualifying donations or grants in the Tulsa MSA reported by the bank.

SERVICE TEST

Performance under the service test was adequate based on the accessibility of delivery systems and the impact of branch closings. The bank reported one qualified community development service in the assessment area.

Retail Services: Gold operates three banking offices in the Tulsa MSA. One of the offices is located in a moderate-income geography and does not have an ATM on the premises. The remaining two branches are in upper-income tracts and both have ATMs. Banking offices are relatively accessible to all portions of the assessment area and the wide array of services offered do not vary in a way that inconveniences certain portions of the assessment area or LMI individuals. Business hours are also adequate.

Community Development Services: As previously mentioned, the bank reported one community development service in the area that qualified under the CRA. Bank officers from one of the Tulsa branch locations taught the course "Get Smart about Credit" to seven area high school classes, one of which had 86 percent of its students enrolled in the free and reduced lunch program.

NONMETROPOLITAN AREAS

(Limited Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE OKLAHOMA RURAL ASSESSMENT AREA

The bank's rural Oklahoma assessment area consists of Kingfisher and Garfield Counties, although Garfield County was formerly part of the Enid, Oklahoma MSA. Effective June 2003, metropolitan statistical areas in the United States were substantially redefined using the results of the 2000 census. The Enid Oklahoma MSA (Garfield County) was reclassified as a nonmetropolitan area as part of the redefinition effort. Kingfisher and Garfield Counties are contiguous and located north of the Oklahoma City MSA in the state's northwestern quadrant.

The bank operates four branches with ATMs and two cash dispensing ATMs in its rural Oklahoma assessment area. All of the branches and ATMs are located in middle- and upper-income tracts.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE RURAL OKLAHOMA ASSESSMENTA AREA

As of June 30, 2004, 7.3 percent of the bank's deposits were in the rural Oklahoma assessment area. Performance in the rural Oklahoma assessment area was compared with the overall state rating, which was based on the full-scope assessment area performance of the Oklahoma City and Tulsa Oklahoma MSAs. The ratings are as follows:

Assessment Area	Lending Test	Investment Test	Service Test		
Rural Oklahoma	Below	Above	Consistent		

CRA APPENDIX A

SCOPE OF EXAMINATION

SCOPE OF EXAMINATION - GOLD BANK

TIME PERIOD REVIEWED

- January 1, 2003 to December 31, 2003 Analysis and Performance Context for Kansas City MO-KS MSA, St. Joseph MSA and Rural Kansas Assessment Area
- January 1, 2004 to September 30, 2004 Analysis and Performance Context for Kansas City MO-KS MSA, St. Joseph MSA and Rural Kansas Assessment Area
- January 1, 2004 to September 30, 2004 Analysis and Performance Context for Oklahoma City MSA, Tulsa MSA and Rural Oklahoma Assessment Area

FINANCIAL INSTITUTION

Gold Bank Leawood, Kansas

(Parent Holding Company is Gold Banc Corporation, Inc. - GBCI)

PRODUCTS REVIEWED

- Home Purchase
- Home Improvement
- Refinancings
- Small Business
- Small Farm
- Community Development

AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED
Gold Banc Capital Trust V	Sub of GBCI	None
Gold Banc Trust IV	Sub of GBCI	None
Gold Banc Trust III	Sub of GBCI	None
Gold Reinsurance Company, LTD.	Sub of GBCI	None
Gold Financial Services, Inc.	Sub of GBCI	None
Gold Trust Co	Sub of Gold Fin Serv, Inc.	None
Gold Merchant Banc, Inc.	Sub of Gold Fin Serv, Inc.	None
Gold Investment Advisors, Inc.	Sub of Gold Fin Serv, Inc.	None
Gold Capital Management, Inc.	Sub of Gold Fin Serv, Inc.	None
Gold Insurance Agency, Inc.	Sub of Gold Fin Serv, Inc.	None
Regional Holding Company, Inc.	Sub of GBCI	None
Realty Escrow Services, Inc.	Sub of Region Hldg Co., Inc.	None
GBC Kansas, Inc.	Sub of GBCI	None
Gold Bank	Sub of GBC Kansas, Inc.	None
Central Oklahoma Leasing	Sub of Gold Bank	None
Authority, Inc.		
Gold IHC I, LLC	Sub of Gold Bank	None
Gold RE Holdings, LLC	Sub of Gold IHC I, LLC	None

(Appendix A continued on next page)

LIST OF ASSESSME	NT AREAS AND TY	PE OF EXAMINATION	
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED ⁵	OTHER INFO
MUTISTATE MSA			
MSA 3760 (Kansas City, MO-KS) • Five of the 11 MSA Counties	Full Review	11301 Nall, Leawood, KS 8840 State Line, Leawood, KS 800 W. 47 th Street Kansas City, MO	
KANSAS			
Rural Kansas Assessment Area Crawford and Cherokee Counties	Full Review	None	
MISSOURI			
MSA 7000 (St. Joseph, MO)	Full Review	None	
<u>OKLAHOMA</u>			
MSA 5880 (Oklahoma City, OK) • Four of the six MSA Counties	Full Review	None	
MSA 8560 (Tulsa, OK)	Full Review	None	
Rural Oklahoma Assessment Area Garfield and Kingfisher Counties	Limited Review	None	

⁵. There is a statutory requirement that the written evaluation of a multistate institution's performance must list the individual branches examined in each state.

CRA APPENDIX B

SUMMARY OF STATE AND MULTISTATE MSA RATINGS

State or Multistate Metropolitan Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Kansas City	Outstanding	High	Low	
MO-KS	Outstanding	Satisfactory	Satisfactory	Satisfactory
	High	Needs to	Low	
Kansas	Satisfactory	Improve	Satisfactory	Satisfactory
	High	Needs to	Low	
Missouri	Satisfactory	Improve	Satisfactory	Satisfactory
	High	Low	Low	
Oklahoma	Satisfactory	Satisfactory	Satisfactory	Satisfactory

CRA APPENDIX C

GLOSSARY

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 metropolitan area/assessment area.

Census tract: 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 statistical 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 lowor 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 moderateincome geographies.

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 nonrelatives 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 (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity and responsiveness).

Geography: A census tract or a block numbering area delineated by the U.S. 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 data such as race, gender and income of applications, amount of loan requested, and disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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

Limited review: Performance under the lending, investment and service tests is analyzed using only quantitative factors (for example, 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 metropolitan area/assessment area.

Metropolitan area ("MA"): Any primary metropolitan statistical area ("PMSA"), metropolitan statistical area ("MSA"), or consolidated metropolitan statistical area ("CMSA"), as defined by the Office of Management and Budget, with a population of 250 thousand or more, and any other area designated as such by the appropriate federal financial supervisory agency.

Middle-income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120percent, 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 multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

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

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

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.

CRA APPENDIX D

CRA CORE TABLES

Institution Gold Bank

Table 1. Lending Volume

LENDING VOLUME	State Kans	as			Evaluation	JANUARY 01, 2003 TO DECEMBER 31, 2003						
	% of Rated Area Loans (#) in	Home Mortgage		Loans to Small Businesses		Loans to Small Farms		Community Development Loans *		Total Reported Loans		% of Rated Area Deposits in
MA/Assessment Area	MSA/AA***	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	MSA/AA**
Full-Review:												
Kansas City MO-KS MSA	68.40	707	117,079	412	71,836	0	0	26	36,902	1,119	188,915	92.06
Rural Kansas	11.00	97	7,175	64	7,063	19	1,030	0	0	180	15,268	3.00
St. Joseph MSA	20.60	275	25,766	59	4,441	3	7	1	41	337	30,214	4.94
Limited-Review:										•		

Note: During the evaluation period, Gold Bank also originated one community development loan in the state of Oklahoma totaling \$706,000.

^(*) The evaluation period for Community Development Loans is JANUARY 01, 2003 TO JANUARY 24, 2005.

^(**) Deposit data as of 2003. Rated area refers to either the state or multi-state MSA rating area.

^(***) Loan data as of 2003. Rated area refers to either the state or multi-state MSA ratings area.

Table 2. Geographic Distribution of Home Purchase

Geographic Distribution: HOME PURCHASE State Kansas Evaluation JANUARY 01, 2003 TO DECEMBER 31, 2003														
	Total Home Low-Income Moderate-Incor Purchase Loans Geographies Geographies			Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*						
MA/Assessment Area	#	% of Total**	% Owner Occ	% BANK Loans	% Owner Occ	% BANK Loans	% Owner Occ	% BANK Loans	% Owner Occ	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:														
Kansas City MO-KS MSA	243	72.75	3.60	8.23	17.58	25.10	44.66	34.98	34.17	31.69	2.14	13.26	41.89	42.71
Rural Kansas	23	6.89	0.00	0.00	20.59	30.43	71.85	60.87	7.57	8.70	0.00	26.55	63.98	8.70
St. Joseph MSA	68	20.36	0.00	0.00	9.14	7.35	70.85	80.88	20.02	11.76	0.00	9.75	69.08	21.04
Limited-Review:														

^(*) Based on 2003 Aggregate HMDA Data only.

^(**) Home purchase loans originated and purchased in the MSA/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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000

Table 3. Geographic Distribution of Home Improvement

Geographic Distribution: HOME	IMPROVEME	NT S	State Kansas		Evaluation	on J	IANUARY 01	, 2003 TO	DECEMBER	31, 2003				
		# /0 0:				Income phies	Middle-In Geogran		Upper-In Geograp				DA Lendi Income*	
MA/Assessment Area	#	% of Total**	% Owner Occ	% BANK Loans	% Owner Occ	% BANK Loans	% Owner Occ	% BANK Loans	% Owner Occ	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:														
Kansas City MO-KS MSA	11	35.48	3.60	0.00	17.58	36.36	44.66	36.36	34.17	27.27	4.44	18.02	46.65	30.85
Rural Kansas	14	45.16	0.00	0.00	20.59	14.29	71.85	71.43	7.57	14.29	0.00	20.91	72.73	6.36
St. Joseph MSA	6	19.35	0.00	0.00	9.14	33.33	70.85	50.00	20.02	16.67	0.00	12.55	64.58	22.51
Limited-Review:														

^(*) Based on 2003 Aggregate HMDA Data only.

^(**) Home improvement loans originated and purchased in the MSA/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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000

Table 4. Geographic Distribution of Home Mortgage Refinance

Geographic Distribution: HOME	MORTGAGE		State K	ansas		Evaluation	on JAN	NUARY 01	, 2003 TO DE	CEMBER	R 31, 20	03		
	Total Ho Mortgage Re Loans	finance	Low-Ind Geograp		Moderate- Geograp		Middle-In Geogran		Upper-In Geograp			gate HMI by Tract		
MA/Assessment Area	#	% of Total**	% Owner Occ	% BANK Loans	% Owner Occ	% BANK Loans	% Owner Occ	% BANK Loans	% Owner Occ	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:		-												
Kansas City MO-KS MSA	440	62.86	3.60	1.82	17.58	8.41	44.66	35.91	34.17	53.86	1.47	10.17	41.38	46.97
Rural Kansas	60	8.57	0.00	0.00	20.59	5.00	71.85	71.67	7.57	23.33	0.00	17.91	67.49	14.12
St. Joseph MSA	200	28.57	0.00	0.00	9.14	6.00	70.85	62.00	20.02	32.00	0.00	6.99	66.75	26.19
Limited-Review:														

^(*) Based on 2003 Aggregate HMDA Data only.

^(**) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

^(***) Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000

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Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTII	FAMILY Sta	te Kans	as		Evaluatio	on J	ANUARY 01	, 2003 TO	DECEMBER	31, 2003				
	Total Multif	, i	Low-Inc Geograp		Moderate-l Geograp		Middle-In Geogran		Upper-In Geograp		Aggreg	gate HMI by Tract	OA Lendi Income*	ng (%)
MA/Assessment Area	#	% of Total**	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:														
Kansas City MO-KS MSA	13	92.86	7.46	23.08	30.10	38.46	43.78	30.77	18.66	7.69	13.69	40.48	32.14	12.50
Rural Kansas	0	0.00	0.00	0.00	45.38	0.00	33.95	0.00	20.67	0.00	0.00	0.00	75.00	25.00
St. Joseph MSA	1	7.14	0.00	0.00	28.41	0.00	54.06	100.00	17.53	0.00	0.00	36.36	54.55	9.09
Limited-Review:														

^(*) Based on 2003 Aggregate HMDA Data only.

^(**) Multifamily loans originated and purchased in the MSA/AA as a percentage of all home multifamily loans originated and purchased in the rated area.

^(***) Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

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Table 6. Geographic Distribution of Loans to Small Businesses

Geographic Distribution: SMALI	LOANS TO		State I	Kansas	E	valuation	JANUA	ARY 01, 2	003 TO DECE	EMBER 3	1, 2003			
	Total Small B Loans		Low-Inc Geograp		Moderate-l Geograp		Middle-In Geograp		Upper-In Geograp		Aggreg	ate Lend Inco	ling (%) l ome*	by Tract
MA/Assessment Area	#	% of Total**	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:		-												
Kansas City MO-KS MSA	412	77.01	4.41	2.18	20.95	21.60	42.82	28.88	30.32	45.15	2.87	16.87	39.35	36.47
Rural Kansas	64	11.96	0.00	0.00	31.66	18.75	59.43	65.63	8.91	15.63	0.00	26.65	58.73	8.88
St. Joseph MSA	59	11.03	0.00	0.00	20.79	15.25	62.48	50.85	16.74	33.90	0.00	14.80	59.33	22.58
Limited-Review:													-	

^(*) Based on 2003 Aggregate Small Business Data only.

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

^(***) Source of DATA-DUN & BRADSTREET.

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Table 7. Geographic Distribution of Loans to Small Farms

Geographic Distribution: SMALI	L LOANS TO		State Kans	as	Eval	uation	JANUAR'	Y 01, 2003	TO DECEM	BER 31, 2	2003			
	Total Sm Farm Loa		Low-Ind Geogra		Moderate- Geograp		Middle-In Geograf		Upper-In Geogra		Aggreg	ate Lend Inco	ling (%) t ome*	y Tract
MA/Assessment Area	Tota			% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:	•													
Kansas City MO-KS MSA	0	0.00	0.21	0.00	5.54	0.00	58.52	0.00	35.32	0.00	1.23	7.41	46.30	43.21
Rural Kansas	19	86.36	0.00	0.00	1.37	0.00	95.43	94.74	3.20	5.26	0.00	0.96	94.26	3.83
St. Joseph MSA	3	13.64	0.00	0.00	0.38	0.00	77.01	100.00	22.61	0.00	0.00	0.41	75.93	23.46
Limited-Review:														

^(*) Based on 2003 Aggregate Small Farm Data only.

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

^(***) Source of DATA-DUN & BRADSTREET.

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Table 8. Borrower Distribution of Home Purchase Loans

Borrwer Distribution: HOME PU	RCHASE	S	State Kansas		E	valuation	JANU	ARY 01, 2	2003 TO DEC	EMBER 3	1, 2003			
	Total Ho Purchase I		Low-Inc Borrow		Moderate-l Borrow		Middle-In Borrow		Upper-In Borrow		Aggreg	jate Lend	ling Data	a (%) **
MA/Assessment Area	#	% of Total*	% of Families***	% BANK Loans*	% of Families***	% BANK Loans*	% of Families***	% BANK Loans*	% of Families***	% BANK Loans*	Low	Mod	Mid	Upp
Full-Review:														
Kansas City MO-KS MSA	243	72.75	18.37	11.11	18.45	19.75	23.20	19.34	39.99	45.68	11.26	22.70	23.72	24.90
Rural Kansas	23	6.89	21.10	17.39	20.38	17.39	24.21	26.09	34.31	39.13	9.01	21.89	24.69	33.07
St. Joseph MSA	68	20.36	18.56	16.18	18.28	26.47	23.95	33.82	39.22	23.53	13.81	21.32	22.67	27.57
Limited-Review:														

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

^(**) Based on 2003 Aggregate HMDA Data only.

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

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Table 9. Borrower Distribution of Home Improvement

Borrwer Distribution: HOME IM	PROVEMENT	S	tate Kansas		E	valuation	JANU	ARY 01, 2	2003 TO DEC	EMBER 3	1, 2003			
	Total Ho Improvement		Low-Inc Borrow		Moderate-I Borrow		Middle-In Borrow		Upper-In- Borrow		Aggreg	jate Lend	ding Data	а (%) **
MA/Assessment Area	#	% of Total*	% of Families***	% BANK Loans*	% of Families***	% BANK Loans*	% of Families***	% BANK Loans*	% of Families***	% BANK Loans*	Low	Mod	Mid	Upp
Full-Review:	-													
Kansas City MO-KS MSA	11	35.48	18.37	9.09	18.45	18.18	23.20	36.36	39.99	36.36	16.70	24.72	27.13	26.49
Rural Kansas	14	45.16	21.10	21.43	20.38	14.29	24.21	28.57	34.31	35.71	14.55	14.55	26.36	41.82
St. Joseph MSA	6	19.35	18.56	33.33	18.28	0.00	23.95	33.33	39.22	33.33	12.55	26.94	24.35	32.10
Limited-Review:														

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

^(**) Based on 2003 Aggregate HMDA Data only.

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

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Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrwer Distribution: HOME MC	ORTGAGE RE	FINANCI	E State K	Cansas	E	valuation	JANU	ARY 01, 2	2003 TO DEC	EMBER 3	1, 2003			
	Total Ho Mortgage Re Loans	finance	Low-Inc Borrow		Moderate- Borrow		Middle-In Borrow		Upper-In Borrow		Aggreg	jate Lenc	ling Data	ı (%) **
MA/Assessment Area	#	% of Total*	% of Families***	% BANK Loans*	% of Families***	% BANK Loans*	% of Families***	% BANK Loans*		% BANK Loans***	Low	Mod	Mid	Upp
Full-Review:		-												
Kansas City MO-KS MSA	440	62.86	18.37	5.68	18.45	20.23	23.20	20.68	39.99	52.05	7.70	17.32	21.96	30.61
Rural Kansas	60	8.57	21.10	3.33	20.38	11.67	24.21	25.00	34.31	60.00	5.72	11.64	23.00	41.32
St. Joseph MSA	200	28.57	18.56	8.50	18.28	19.50	23.95	22.00	39.22	44.50	7.22	16.02	22.42	28.50
Limited-Review:														

^(*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

^(**) Based on 2003 Aggregate HMDA Data only.

^(***) Percentage of Families is based on 2000 Census Information.

Table 11. Borrower Distribution of Loans to Small Businesses

Borrwer Distribution: SMALL LO	DANS TO BUSINE	SSES	State Kans	as	Evaluation	JANUARY 01, 200	3 TO DECEMBER 3	1, 2003	
	Total Smal to Busine			ses with of \$1 million		Loans by Original A Regardless of Busine		Aggrega	te Data***
MA/Assessment Area	#	% 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:									
Kansas City MO-KS MSA	412	77.01	81.55	71.84	228	91	93	42,063	14,233
Rural Kansas	64	11.96	85.91	90.63	50	5	9	1,306	555
St. Joseph MSA	59	11.03	85.60	86.44	48	5	6	2,879	1,446
Limited-Review:									

^(*) Businesses with revenue of \$1 million or less as a percentage of all businesses. DATA-DUN & BRADSTREET 2003

^(**) Small loans to businesses with revenue of \$1 million or less as a percentage of all loans reported as small loans to businesses.

^(***) Based on 2003 Aggregate Small Business Data only.

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

Table 12. Borrower Distribution of Loans to Small Farms

Borrwer Distribution: SMALL LC	DANS TO FARMS		State Kans	as	Evaluation	JANUARY 01, 200	3 TO DECEMBER 3	1, 2003	
	Total Small Loans			Revenues of n or less		Loans by Original A Regardless of Farr		Aggrega	ite Data***
MA/Assessment Area	#	% of Total****	% of Farm*	% BANK Loans**	\$100,000 or Less	>\$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less
Full-Review:									
Kansas City MO-KS MSA	0	0.00	96.30	0.00	0	0	0	324	289
Rural Kansas	19	86.36	97.26	100.00	16	3	0	209	203
St. Joseph MSA	3	13.64	99.62	100.00	3	0	0	486	476
Limited-Review:									

^(*) Farms with revenue of \$1 million or less as a percentage of all businesses. DATA-DUN & BRADSTREET 2003

^(**) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

^(***) Based on 2003 Aggregate Small Farm Data only.

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

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Table 13. Qualified Investments

QUALIFIED INVESTMENTS		State	Kansas	Evaluation	JANUARY 0	1, 2003 TO JAN	UARY 24,	2005	
	Prior Period	Investments*	Current Perio	od Investments	Tota	al Investments		Unfunded Co	ommitments**
MA/Assessment Area	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Review:	-								
Kansas City MO-KS MSA	1	4,600	38	3,496	39	8,096	74.96	0	0
Oklahoma City MSA	0	0	2	555	2	555	05.14	0	0
Rural Kansas	0	0	2	1	2	1	0.01	0	0
St. Joseph	0	0	2	2	2	2	0.02	0	0
Tulsa MSA	0	0	1	77	1	77	0.71	0	0
Limited-Review:									
Rural Oklahoma	0	0	1	2,070	1	2,070	19.16	0	0

^(*) A Prior Period Investment means investments made in a previous evaluation period that are outstanding as of the examination date.

^(**) A Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

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Table 14. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH	DELIVERY SYS	STEM AND BR	ANCH			State	e Kans	as	Evalua	ition	JAN	IUARY	01, 200)4 TO .	JANUAI	RY 24, 2	2005
	Deposits		Bran	ches					Branch O	penings	/ Closin	gs			Popu	lation	
	% of Rated Area	# of	BANK Branches E					# of	# of		hange i ranches					ulation ograph	
MA/Assessment Area	Deposits in MSA/AA							Branch Closings	Branch Opening	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Review:							•	•	•						•		
Kansas City MO-KS MSA	0.00	14	50.00	0	0	5	9	1	1	0	0	0	0	5.60	20.88	42.24	
Oklahoma City MSA	0.00	3	10.71	0	1	1	1	0	0	0	0	0	0	3.88	27.04	37.35	
Rural Kansas	0.00	2	7.14	0	1	0	1	13	0	0	-1	-12	0	0.00	15.54	73.48	
St. Joseph	0.00	2	7.14	0	0	0	2	0	0	0	0	0	0	0.00	12.94	54.09	
Tulsa MSA	0.00	3	10.71	0	1	0	2	0	0	0	0	0	0	1.91	21.68	46.52	
Limited-Review:																	
Rural Oklahoma	0.00	4	14.29	0	0	2	2	3	0	0	-1	-2	0	0.00	8.28	57.13	