



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

June 30, 2008

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Old National Bank
Charter Number: 8846

1 Main Street
Evansville, IN 47708

Office of the Comptroller of the Currency

Midsized Bank Supervision
One Financial Place, Suite 2700
440 South LaSalle Street
Chicago, IL 60605-1073

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated Satisfactory.

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

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

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

The major factors that support this rating include:

- Lending levels are adequate in the Evansville-Henderson, IN-KY MA #21780 and in the states of Illinois and Kentucky. Lending levels are good in the states of Indiana and Ohio.
- The geographic distribution of loans among geographies is good in the Evansville-Henderson, IN-KY MA #21780 and in the state of Illinois. The geographic distribution is adequate in the states of Indiana, Kentucky, and Ohio.
- The distribution of loans among borrowers of different income levels is good in the Evansville-Henderson, IN-KY MA #21780 and in the states of Illinois, Indiana, and Ohio. The distribution of loans is adequate in the state of Kentucky.
- CD lending had a positive impact on the lending test rating for the Evansville-Henderson, IN-KY MA #21780 and for the state of Indiana.
- Investment activity reflects good responsiveness to community credit needs in the Evansville-Henderson, IN-KY MA #21780 and in the states of Illinois, Indiana, and Kentucky. Investment activity reflects adequate responsiveness to community credit needs in the state of Ohio.
- The accessibility of the bank's delivery systems to geographies and individuals of different income levels is excellent in the Evansville-Henderson, IN-KY MA #21780 and in the state of Illinois and Kentucky. The accessibility is adequate in the state of Indiana and Ohio.

Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

Description of Institution

Old National Bank (ONB) is a midsize interstate bank headquartered in Evansville, Indiana. ONB is a wholly owned subsidiary of Old National Bancorp, a \$7.6 billion bank holding company also headquartered in Evansville, Indiana.

ONB's business strategy focuses primarily on providing loans to small and mid-sized commercial and retail banking customers. Loan products offered include one- to four-family residential real estate loans, multifamily residential real estate loans, home equity lines of credit, commercial loans, agricultural loans, and various consumer loans.

As of June 30, 2008, ONB reported total assets of \$7.5 billion and Tier One Capital of \$607 million. Net loans represented 63 percent of total assets and consisted of real estate loans (50 percent), commercial loans (25 percent), consumer loans (15 percent), agricultural loans (2 percent), and other loans (8 percent).

ONB is an interstate bank with 115 branch offices located in Indiana (83), Illinois (15), Kentucky (16), and Ohio (1) in the assessment areas (AAs) being evaluated. In February 2006, ONB opened a branch office in the Lafayette, IN MA #29140 thus creating a new AA. In February 2007, ONB acquired St. Joseph Capital Bank located in the South Bend-Mishawaka, IN MA #43780 and Elkhart-Goshen, IN MA #21140, thus creating two additional AAs. There are no legal, financial, or other factors impeding ONB's ability to help meet the credit needs of the AAs it serves.

At the bank's request, we also considered qualified investments provided by an affiliated 501(c) 3 non-profit entity, Old National Bank Foundation, Inc., which receives its funding from Old National Bancorp.

ONB was rated "Satisfactory" at its last CRA evaluation dated March 14, 2005.

Scope of the Evaluation

Evaluation Period and Products Evaluated

The evaluation period for the Lending Test was January 2, 2005 through June 30, 2008 with the exception of community development (CD) loans. The evaluation period for CD loans, the Investment Test, and the Service Test was March 15, 2005 through June 30, 2008.

We did not consider ONB's performance in the Fort Wayne, IN MA #23060 in our analysis, since the bank did not have a branch office in this MA until May 5, 2008. Additionally, we did not consider ONB's performance in the Clarksville, TN-KY MA #17300 and St. Louis, MO-IL MA #41180 in our analysis, since the bank did not have a physical presence in these MAs for most of the evaluation period. ONB sold their branches in these AAs on October 7, 2005 and March 17, 2006, respectively.

Data Integrity

We tested ONB's publicly filed information on home mortgage loans, small loans to businesses, and small loans to farms for accuracy as part of this CRA evaluation. The loan data was substantially accurate. We also reviewed CD loans, qualified investments, and CD services that were submitted by ONB to verify they met the regulatory definition of CD. We excluded the CD activities from our review that did not meet the definition of CD.

We determined that ONB routinely originated small loans to businesses and small loans to farms without relying on revenue information to make the credit decision. Consequently, the percentage of these loans with known revenues is not sufficient to perform a meaningful analysis regarding the distribution of lending by borrower income.

Selection of Areas for Full-Scope Review

In each state and multistate metropolitan area where the bank has an office, a sample of AAs within that state and multistate metropolitan area was selected for full-scope reviews. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section for details regarding how the areas were selected.

Ratings

The bank's overall rating is a blend of the multistate metropolitan area rating(s) and state ratings. We placed the most weight on the state of Indiana followed by the Evansville-Henderson, IN-KY MA #21780 because these areas have the largest percentage of ONB's deposits, branches, and loans originated and purchased during the evaluation period. The state of Kentucky and state of Illinois were weighted the same because they have approximately the same percentage of ONB's deposits, branches, and loans originated and purchased during the evaluation period. We placed the least weight on the state of Ohio because this area has the smallest percentage of ONB's deposits, branches, and loans originated and purchased during the evaluation period.

The multistate metropolitan area rating(s) and state ratings are based primarily on those areas that received full-scope reviews. Refer to the “Scope” section under each State and Multistate Metropolitan Area Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Fair Lending or Other Illegal Credit Practices Review

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

Multistate Metropolitan Area Rating

Evansville-Henderson, IN-KY MA #21780

CRA rating for the Evansville-Henderson, IN-KY MA #21780¹: **Outstanding**

The lending test is rated: **Outstanding**

The investment test is rated: **High Satisfactory**

The service test is rated: **Outstanding**

The major factors that support this rating include:

- Lending levels are adequate.
- The geographic distribution of loans among geographies is good.
- The distribution of loans among borrowers of different income levels is good.
- Excellent CD lending had a positive impact on the lending test rating.
- Investment activity reflects a good level of responsiveness to identified community needs.
- ONB's service delivery systems are readily accessible to geographies and individuals of different income levels. The bank provides a relatively high level of CD services.

Description of Institution's Operations in Evansville-Henderson, IN-KY MA #21780

The Evansville-Henderson, IN-KY MA #21780 represents 29 percent (\$1.6 billion) of ONB's total deposits. During the evaluation period, ONB originated and purchased 29 percent, 24 percent, and 7 percent of total home mortgage loans, small loans to businesses, and small loans to farms, respectively, within this AA. ONB has 18 branch offices and 39 automatic teller machines (ATMs) in this AA. ONB is the largest bank in this AA, which is comprised of both metropolitan and rural areas. ONB's primary competition includes Fifth Third Bank, Integra Bank, N.A., and Bank of Evansville.

Refer to the market profile for the Evansville-Henderson, IN-KY MA #21780 in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

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

Scope of Evaluation in Evansville-Henderson, IN-KY MA #21780

We determined the community's needs by contacting representatives from a housing organization and three social services organizations. We also reviewed the Department of Housing and Urban Development (HUD) Consolidated Housing and CD Plan for the city of Evansville. HUD Consolidated Housing and CD Plans are comprehensive planning documents that identify community needs. See the Market Profile for the Evansville-Henderson, IN-KY MA #21780 in appendix C for further information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Evansville-Henderson, IN-KY MA #21780 is rated "Outstanding".

Lending Activity

Refer to Table 1 Lending Volume in the "Multistate Metropolitan Area(s)" section of appendix D for the facts and data used to evaluate the bank's lending activity.

ONB's lending activity is adequate in the Evansville-Henderson, IN-KY MA #21780. During this evaluation period, 59 percent, 38 percent, and 3 percent of the loans originated and purchased in this AA were home mortgage loans, small loans to businesses, and small loans to farms, respectively. Among home mortgage loans, 40 percent, 21 percent, and 39 percent were home purchase, home improvement, and home mortgage refinance loans, respectively. Multifamily loans represented less than 1 percent of total loans in this AA.

ONB's lending activity is adequate given its deposit market share considering the large number of lending competitors operating in this AA. ONB ranks first in terms of deposits among depository institutions, with a 29 percent market share. According to 2007 aggregate HMDA data, ONB is the third largest, largest, and largest originator and purchaser of home purchase, home improvement, and home mortgage refinance loans with an 8 percent, 29 percent, and 10 percent market share, respectively. ONB's lending levels are excellent for home improvement loans. While ONB's market share of home purchase and home mortgage refinance loans is lower than its deposit market share, we considered the performance adequate given the large number of mortgage lenders originating loans within the AA, many of which do not have a deposit taking facility within the AA. ONB ranks fifth and first among all lenders for small loans to businesses and small loans to farms, respectively based on 2007 Aggregate CRA data with a 10 percent and 35 percent market share, respectively. ONB's lending levels are adequate and excellent for small loans to businesses and small loans to farms, respectively. While ONB's market share of small loans to businesses is lower than its deposit market share, we considered their performance adequate given the top six lenders, excluding ONB, do not have a deposit taking facility within the AA.

Distribution of Loans by Income Level of the Geography

The geographic distribution of ONB's home mortgage loans, small loans to businesses, and small loans to farms in the Evansville-Henderson, IN-KY MA #21780 is good. The number of multifamily loans originated and purchased in this AA and the number of farms located in low-income geographies are not significant enough to perform a meaningful analysis. Dunn and Bradstreet data indicates there are only three farms located in low-income geographies.

In the AA, we placed the most weight on the distribution of small loans to businesses, then home purchase loans, and then home mortgage refinance loans because they represented the largest percentage of loans originated and purchased within the AA.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the "Multistate Metropolitan Area(s)" section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

The geographic distribution of home purchase loans is adequate. The portion of home purchase loans in low-income geographies was significantly lower than the portion of owner-occupied housing units within those geographies. However, the bank's market share of loans in low-income geographies was somewhat lower than the bank's overall market share. The portion of home purchase loans in moderate-income geographies was somewhat lower than the portion of owner-occupied housing units within those geographies. However, the bank's market share of loans in moderate-income geographies was near the bank's overall market share.

Home Improvement Loans

The geographic distribution of home improvement loans is good. The portion of home improvement loans in low-income geographies was somewhat lower than the portion of owner-occupied housing units within those geographies. However, the bank's market share of loans in low-income geographies exceeded the bank's overall market share. The portion of home improvement loans in moderate-income geographies exceeded the portion of owner-occupied housing units within those geographies. The bank's market share of loans in moderate-income geographies equaled the bank's overall market share.

Home Mortgage Refinance Loans

The geographic distribution of home mortgage refinance loans is good. The portion of home mortgage refinance loans in low-income geographies was somewhat lower than the portion of owner-occupied housing units within those geographies. However, the bank's market share of loans in low-income geographies exceeded the bank's overall market share. The portion of home mortgage refinance loans in moderate-income geographies was near the portion of owner-occupied housing units within those geographies. The

bank's market share of loans in moderate-income geographies was near the bank's overall market share.

Small Loans to Businesses

Refer to Table 6 in the "Multistate Metropolitan Area(s)" section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The geographic distribution of small loans to businesses is good. The portion of small loans to businesses in low-income geographies was lower than the portion of businesses within those geographies. However, the bank's market share of loans in low-income geographies exceeded the bank's overall market share. The portion of small loans to businesses in moderate-income geographies was near the portion of businesses within those geographies. The bank's market share of loans in moderate-income geographies exceeded the bank's overall market share.

Small Loans to Farms

Refer to Table 7 in the Multistate Metropolitan Area(s) section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to farms.

The geographic distribution of small loans to farms is good. The portion of small loans to farms in moderate-income geographies was near the portion of farms within those geographies. However, the bank's market share of loans in moderate-income geographies exceeded the bank's overall market share.

We reviewed summary reports detailing ONB's lending activity over the evaluation period for home mortgage loans, small loans to businesses, and small loans to farms to identify gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in lending.

Lending Gap Analysis

We reviewed summary reports detailing ONB's lending activity over the evaluation period for home mortgage loans, small loans to businesses, and small loans to farms to identify gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in lending.

Inside/Outside Ratio

The inside/outside ratio analysis was conducted at the bank level. A substantial majority (90 percent) of home mortgage loans originated and purchased by ONB during the evaluation period was within the bank's AAs in Kentucky, Illinois, Indiana, and Ohio. ONB originated and purchased 89 percent, 88 percent, 91 percent, and 85 percent of home purchase, home mortgage refinance, home improvement, and multifamily loans, respectively, within all of its AAs. The bank originated and purchased 88 percent and 86 percent of small loans to businesses and small loans to farms, respectively, within all of its

AAs. Ninety-six percent of CD loans were originated and purchased within the bank's AAs. We gave positive consideration to this record of lending within the AAs when drawing conclusions relative to the overall geographic distribution of lending by income level of geography.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of home mortgage loans and small loans to businesses reflects good dispersion among borrowers of different income levels in the Evansville-Henderson, IN-KY MA #21780.

In December 2006, ONB management made a business decision to underwrite small loans to businesses and small loans to farms without revenue information. A majority of the small loans to farm loans did not have revenue information. Consequently, a meaningful analysis couldn't be performed. In evaluating the bank's performance of small loans to businesses, we took into consideration that 24 percent of these loans in this AA did not have revenue information.

In the AA, we placed the most weight on the distribution of small business loans, home purchase loans, and then home mortgage refinance loans because they represented the largest percentage of loans originated and purchased within the AA.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the "Multistate Metropolitan Area(s)" section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In evaluating the borrower distribution of home mortgage loans, we considered the percentage of families (7 percent) who live below the poverty level and the barriers that this may have on home ownership.

Home Purchase Loans

ONB does a good job of addressing the low- and moderate-income borrower credit needs for home purchase loans. The portion of home purchase loans to low-income borrowers was lower than the portion of AA families who are low-income. However, the bank's market share of loans to low-income borrowers was near the bank's overall market share. The portion of home purchase loans to moderate-income borrowers exceeded the portion of AA families who are moderate-income. The bank's market share of loans to moderate-income borrowers was near the bank's overall market share.

Home Improvement Loans

ONB does a good job of addressing the low- and moderate-income borrower credit needs for home improvement loans. The portion of home improvement loans to low-income borrowers was somewhat lower than the portion of AA families who are low-income. However, the bank's market share of loans to low-income borrowers was near the bank's

overall market share. The portion of home improvement loans to moderate-income borrowers exceeded the portion of AA families who are moderate-income. The bank's market share of loans to moderate-income borrowers exceeded the bank's overall market share.

Home Mortgage Refinance Loans

ONB does a good job of addressing the low- and moderate-income borrower credit needs for home mortgage refinance loans. The portion of home mortgage refinance loans to low-income borrowers was lower than the portion of AA families who are low-income. However, the bank's market share of loans to low-income borrowers was somewhat lower than the bank's overall market share. The portion of home mortgage refinance loans to moderate-income borrowers exceeded the portion of AA families who are moderate-income. The bank's market share of loans to moderate-income borrowers was somewhat lower than the bank's overall market share.

Small Loans to Businesses

Refer to Table 11 in the "Multistate Metropolitan Area(s)" section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is good. The portion of loans extended to businesses with revenues of \$1 million or less was somewhat lower than the portion of area businesses that have revenue levels of \$1 million or less. The bank's market share to the \$1 million or less borrowers exceeded the bank's overall market share.

Small Loans to Farms

Refer to Table 12 in the "Multistate Metropolitan Area(s)" section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

Community Development Lending

Refer to Table 1 Lending Volume in the "Multistate Metropolitan Area(s)" section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

The bank's level of CD lending was excellent and had a positive impact on the lending test rating. ONB originated 17 CD loans in the AA for a total of \$41 million dollars. ONB's CD loans consisted of seven loans that provided affordable housing to low- and moderate-income individuals, one loan that promoted economic development, seven loans that supported revitalization efforts, and two loans to organizations that provide community services to low- and moderate-income individuals within the AA. The following examples highlight ONB's CD lending in the AA:

- ONB originated a \$1.5 million loan to help fund a 35-unit multifamily rental housing complex for low- and moderate-income individuals. Low-income housing tax credits were also used to fund this project.
- ONB originated a \$3.8 million loan to a business to help fund the construction of a 25,000 sq. ft. warehouse located in a moderate-income census tract. This facility will assist in revitalizing and stabilizing this geography as it's anticipated approximately 50 low- and moderate-income individuals will be hired.

Product Innovation and Flexibility

ONB used one non-proprietary and one proprietary affordable mortgage loan product to meet the affordable housing needs of low- and moderate-income individuals. ONB also used one non-proprietary business loan product to meet the credit needs of small business owners. The use of these loan products had a neutral impact on the lending test. Details regarding the use of these loan products are discussed below.

- **Home Manager Mortgage:** The flexible loan underwriting criteria for this proprietary mortgage loan product includes 97 percent financing with no private mortgage insurance requirements and the ability to use down payment funds from personal savings, gifts from a family member, or a grant from a qualified agency. Additionally, non-traditional credit histories, such as paid utility and rent receipts, are accepted. These loans are restricted to low- and moderate-income borrowers who complete a HUD Certified Home Buyer Education Program. ONB originated two loans totaling \$135,000.
- **USDA Rural Housing Loans:** The flexible loan underwriting criteria for this non-proprietary mortgage loan product includes 100 percent financing. Eligibility requirements include income restrictions, and the families must presently be without adequate housing. Loan proceeds must be used to build, renovate, or purchase a home in rural areas. ONB originated seven loans totaling \$498,000.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the Evansville-Henderson, IN-KY MA #21780 is rated "High Satisfactory". Based on the full-scope review, the bank's performance in this AA is good.

Refer to Table 14 in the "Multistate Metropolitan Area(s)" section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

In drawing our conclusions relative to this AA, we considered the complexity of the activity, the bank's capacity, degree of competition, credit and community credit needs of the AA, and available opportunities for investment. As described in the Market Profiles section in

Appendix C, we determined the opportunity to make qualified investments other than donations does exist but is limited.

ONB made \$6.3 million of qualified investments during the evaluation period, none of which were complex. The qualified investments consisted of donations totaling \$1 million to organizations that had a CD purpose and \$5.3 million in a CRA Qualified Investment Fund (QIF). A QIF makes investments in qualified securities throughout the nation and can target its purchases to fund projects in each shareholder's (bank's) AA. These investments include individual mortgages to low- and moderate-income individuals, municipal housing bonds, and other mortgage backed securities that assist low- and moderate-income individuals with housing needs.

ONB has low-income housing tax credits, totaling \$1 million, from prior evaluation periods that remain outstanding. These tax credits were used to fund multifamily housing complexes within this AA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in the Evansville-Henderson, IN-KY MA #21780 is rated "Outstanding". Based on full-scope review, the bank's performance in this AA is excellent.

Retail Banking Services

Refer to Table 15 in the "Multistate Metropolitan Area(s)" section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

ONB's service delivery systems are readily accessible to geographies and individuals of different income levels throughout the AA. The percentage of branches in low- and moderate-income geographies substantially exceeds the percentage of the population residing in these geographies, respectively. Branch openings and closings have generally not adversely affected the accessibility of ONB's delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. There were no branch openings in this AA, but there were three branch closings in moderate-(one) and middle-income (two) geographies. However, another branch did remain open in the moderate-income geography.

ONB's hours and services offered throughout the AA are good. Office hours and services do not vary in a way that inconveniences its AA, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. Banking hours and services are provided Monday through Friday and are supplemented by Saturday hours at 16 of the 18 branch offices in this AA. The two branches that don't have Saturday hours are located in a moderate- and a middle-income geography. There was no material differences in the services offered at the various branch locations.

ONB uses ATMs and online banking as alternative delivery systems for providing retail banking services to low- and moderate-income individuals and in low- and moderate-income geographies. ONB has 27 full service and 12 cash dispense only ATMs located in this AA. The percentage of ATMs in low- and moderate-income geographies exceeds the percentage of the population residing in these geographies, respectively. All of the ATMs located in low- and moderate-income geographies are full service with the exception of one located in a moderate-income geography. Online banking allows customers to retrieve balances, open accounts, transfer funds, print statements, and pay bills online. Although online banking is available to all individuals, it isn't an effective means of providing retail banking services to low- and moderate-income individuals. Information received from ONB revealed less than 15 percent of low- and moderate-income individuals use online banking.

Community Development Services

ONB has provided a relatively high level of CD services in this AA. Although ONB's CD services have generally not been innovative, they have met some of the identified community needs. The CD services were related to affordable housing for low- and moderate-income individuals, revitalizing and stabilizing a designated disaster area, and providing community services to low- and moderate-income individuals. Approximately 55 organizations have benefited from ONB's participation. Examples of CD services include:

- Several ONB employees provided CD services to a non-profit housing corporation that provides transitional housing for low-income and homeless families. CD services included reviewing and approving applications for transitional housing assistance, raising funds from private donors, preparing budgets, financial planning, researching funding sources to operate the organization's programs, and reviewing and approving the Federal Home Loan Bank Affordable Housing Program (AHP) grant application.
- Approximately 50 ONB employees participated in fund raising activities in response to the November 2005 tornado that affected Vanderburgh and Warrick Counties, which were designated as disaster areas by Federal Emergency Management Agency (FEMA). Representatives of ONB partnered with local media and other financial institutions to raise over \$1.2 million for the local Red Cross and Salvation Army recovery efforts.
- An ONB employee assisted with fund raising activities for an inner city church that provides community services to low- and moderate-income individuals. These services include a soup kitchen, computer training program for workforce development, weekend child care, and a neighborhood health program.
- ONB employees participated in the Internal Revenue Service (IRS) Volunteer Income Tax Assistance Program in which they provided free tax preparation services primarily to low- and moderate-income individuals. Additionally, they conducted training sessions on utilizing the tax preparation software to 16 volunteers who were serving as tax preparers. In 12 weeks, they completed approximately 450 tax returns resulting in refunds of approximately \$310,000.

State Rating

State of Illinois

CRA Rating for Illinois²: Satisfactory

The lending test is rated: **High Satisfactory**

The investment test is rated: **High Satisfactory**

The service test is rated: **Outstanding**

The major factors that support this rating include:

- Lending levels are adequate.
- The geographic distribution of loans among geographies is good.
- The distribution of loans among borrowers of different income levels is good.
- CD lending had a neutral impact on the lending test performance.
- Investment activity reflects a good level of responsiveness to identified community needs.
- ONB's service delivery systems are readily accessible to geographies and individuals of different income levels. The bank provides a relatively high level of CD services.

Description of Institution's Operations in Illinois

The state of Illinois represents 13 percent (\$727 million) of ONB's total deposits. During the evaluation period, ONB originated and purchased 11 percent, 11 percent, and 13 percent of its total home mortgage loans, small loans to businesses, and small loans to farms, respectively, within the state of Illinois. ONB has 15 branch offices and 25 ATMs in Illinois. ONB has two AAs and is the 63rd largest bank in the state of Illinois in relation to deposits. Its AAs are mostly rural areas. ONB's primary competition includes Banterra Bank, Midcountry Bank, Peoples National Bank, N.A., and First Midwest Bank. The AAs of Clark, Jackson, Jefferson, Lawrence, Saline Wabash, White, and Williamson Counties has the largest percentage of ONB's deposits, branches, and loans originated and purchased within the state of Illinois.

Refer to the market profiles for the state of Illinois in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state 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.

Scope of Evaluation in Illinois

We selected the AA of the Non MA IL Counties (Clark, Jackson, Jefferson, Lawrence, Saline, Wabash, White, and Williamson Counties) to receive a full scope review. This AA was chosen for a full-scope review because it had the largest percentage of deposits, branches, and loans originated and purchased within the state of Illinois. The remaining AA of the Danville, IL MA #19180 received a limited-scope review. Refer to the table in appendix A for additional information on the scope of our review.

We placed the most weight on the results of the full-scope AA of the Non MA IL Counties because this AA had the largest percentages of ONB's deposits, branches, and loans originated and purchased within the state.

We determined the community's needs by contacting representatives from an economic development agency, two affordable housing agencies, and three social service agencies. See the Market Profile for the Non MSA IL Counties in appendix C for further information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

Refer to Table 1 Lending Volume in the state of Illinois section of appendix D for the facts and data used to evaluate the bank's lending activity.

ONB's lending activity is adequate in the Non MA IL Counties. During this evaluation period, 53 percent, 35 percent, and 12 percent of the loans originated and purchased in this AA were home mortgage loans, small loans to businesses, and small loans to farms, respectively. Among home mortgage loans, 31 percent, 31 percent, 37 percent, and 1 percent were home purchase, home improvement, home mortgage refinance, and multifamily loans, respectively.

ONB's lending activity is adequate given its deposit market share considering the large number of lending competitors operating in this AA. ONB ranks first in terms of deposits among depository institutions, with a 13 percent market share. According to 2007 aggregate HMDA data, ONB is the fourth largest, largest, and second largest originator and purchaser of home purchase, home improvement, and home mortgage refinance loans with a 5 percent, 32 percent, and 6 percent market share, respectively. ONB's lending levels are excellent for home improvement loans. While ONB's market share of home purchase and home mortgage refinance loans is less than its deposit market share, we considered the performance adequate given the large number of mortgage lenders originating loans within the AA, many of which do not have a deposit taking facility within the AA.

ONB ranks eighth and first among all lenders for small loans to businesses and small loans to farms, respectively, based on 2007 Aggregate CRA data with a 4 percent and 24 percent market share, respectively. ONB's lending levels are adequate and excellent for small loans to businesses and small loans to farms, respectively. While ONB's market share of small loans to businesses is lower than its deposit market share, we considered their performance adequate given the top seven lenders do not have a deposit taking facility within the AA.

Distribution of Loans by Income Level of the Geography

The geographic distribution of ONB's home mortgage loans, small loans to businesses, and small loans to farms in the Non MA IL Counties is good. The number of multifamily loans originated and purchased in this AA and the number of farms located in low-income geographies are not significant enough to perform a meaningful analysis. Dunn and Bradstreet data indicates there is only one farm located in low-income geographies.

In the AA, we placed the most weight on the distribution of small loans to businesses, then home mortgage refinance loans, and then home improvement loans because they represented the largest percentage of loans originated and purchased within the AA.

Home Mortgage Loans

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

Home Purchase Loans

The geographic distribution of home purchase loans is excellent. The portion of home purchase loans in low- and moderate-income geographies, respectively, exceeded the portion of owner-occupied housing units within those geographies. The bank's market share of loans in moderate-income geographies also exceeded the bank's overall market share. In 2007, the bank didn't originate and purchase any home purchase loans in low-income geographies. Consequently, ONB showed a market share of 0 percent for these geographies.

Home Improvement Loans

The geographic distribution of home improvement loans is excellent. The portion of home improvement loans in low- and moderate-income geographies, respectively, exceeded the portion of owner-occupied housing units within those geographies. The bank's market share of loans in low-income geographies exceeded the bank's overall market share. The bank's market share of loans in moderate-income geographies was somewhat lower than the bank's overall market share.

Home Mortgage Refinance Loans

The geographic distribution of home mortgage refinance loans is good. The portion of home mortgage refinance loans in low-income geographies was somewhat lower than the portion of owner-occupied housing units within those geographies. In 2007, the bank didn't make any home mortgage refinance loans in low-income geographies. Consequently, ONB showed a market share of 0 percent for these geographies. The portion of home mortgage refinance loans in moderate-income geographies exceeded the portion of owner-occupied housing units within those geographies. The bank's market share of loans in moderate-income geographies exceeded the bank's overall market share.

Small Loans to Businesses

Refer to Table 6 in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The geographic distribution of small loans to businesses is adequate. The portion of small loans to businesses in low-income geographies was significantly lower than the portion of businesses within those geographies. The bank's market share of loans in low-income geographies was lower than the bank's overall market share. The portion of small loans to businesses in moderate-income geographies was somewhat lower than the portion of businesses within those geographies. The bank's market share of loans in moderate-income geographies was somewhat lower than the bank's overall market share. In evaluating the bank's performance, we took into consideration there were limited opportunities to lend in low-income geographies and more weight was placed on the performance in moderate-income geographies. There were only 375 businesses in low-income geographies.

Small Loans to Farms

Refer to Table 7 in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to farms.

The geographic distribution of small loans to farms is adequate. The portion of small loans to farms in moderate-income geographies was somewhat lower than the portion of farms within those geographies. The bank's market share of loans in moderate-income geographies was somewhat lower than the bank's overall market share.

Lending Gap Analysis

We reviewed summary reports detailing ONB's lending activity over the evaluation period for home mortgage loans, small loans to businesses, and small loans to farms to identify gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in lending.

Inside/Outside Ratio

The inside/outside ratio analysis was conducted at the bank level. Refer to Evansville-Henderson, IN-KY MA #21780.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of home mortgage loans and small loans to businesses reflects good dispersion among borrowers of different income levels in the Non MA IL Counties.

In December 2006, ONB management made a business decision to underwrite small loans to businesses and small loans to farms without revenue information. A majority of the small loans to farm loans did not have revenue information. Consequently, a meaningful analysis couldn't be performed. In evaluating the bank's performance of small loans to businesses, we took into consideration that 36 percent of these loans in this AA did not have revenue information.

In the AA, we placed more weight on the distribution of small loans to businesses, then home mortgage refinance loans, and then home improvement loans because they represented the largest percentage of loans originated and purchased within the AA.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In evaluating the borrower distribution of home mortgage loans, we considered the percentage of families (11 percent) who live below the poverty level and the barriers this may have on home ownership.

Home Purchase Loans

ONB does a good job of addressing the low- and moderate-income borrower credit needs for home purchase loans. The portion of home purchase loans to low-income borrowers was lower than the portion of AA families who are low-income. However, the bank's market share of loans to low-income borrowers exceeded the bank's overall market share. The portion of home purchase loans to moderate-income borrowers exceeded the portion of AA families who are moderate-income. The bank's market share of loans to moderate-income borrowers exceeded the bank's overall market share.

Home Improvement Loans

ONB does a good job of addressing the low- and moderate-income borrower credit needs for home improvement loans, an identified credit need. The portion of home improvement loans to low-income borrowers was lower than the portion of AA families who are low-income. The bank's market share of loans to low-income borrowers was somewhat lower than the bank's overall market share. The portion of home improvement loans to moderate-

income borrowers exceeded the portion of AA families who are moderate-income. The bank's market share of loans to moderate-income borrowers was somewhat lower than the bank's overall market share.

Home Mortgage Refinance Loans

ONB does an adequate job of addressing the low- and moderate-income borrower credit needs for home mortgage refinance loans. The portion of home mortgage refinance loans to low-income borrowers was significantly lower than the portion of AA families who are low-income. The bank's market share of loans to low-income borrowers was lower than the bank's overall market share. The portion of home mortgage refinance loans to moderate-income borrowers was somewhat lower than the portion of AA families who are moderate-income. The bank's market share of loans to moderate-income borrowers was somewhat lower than the bank's overall market share.

Small Loans to Businesses

The borrower distribution of small loans to businesses is good. The portion of loans extended to businesses with revenues of \$1 million or less was somewhat lower than the portion of area businesses that have revenue levels of \$1 million or less. The bank's market share to the \$1 million or less borrowers was lower than the bank's overall market share.

Refer to Table 11 in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Small Loans to Farms

Refer to Table 12 in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

Community Development Lending

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

Although CD lending is good, it is not strong enough to have an impact on the lending test rating. ONB originated 10 CD loans in the AA, totaling \$2.9 million, to organizations that provide community services to low- and moderate-income individuals within the AA. The following examples highlight ONB's CD lending in the AA:

- ONB originated a \$1.1 million loan to a non-profit entity whose mission is to provide community services consisting of vocational training to disabled and disadvantaged

individuals who are primarily low- or moderate-income. Funds were used to construct a new facility in which a warehouse, a retail store, and office space is located.

- ONB originated a \$1 million loan to a non-profit entity to construct a facility that will house a soup kitchen for the homeless.

Product Innovation and Flexibility

ONB used one non-proprietary affordable mortgage loan product (USDA Rural Housing Loans) to meet the affordable housing needs of low- and moderate-income individuals. The use of this loan product had a neutral impact on the lending test. ONB originated seven loans totaling \$407,000. Refer to the Evansville-Henderson, IN-KY MA #21780 section of this evaluation for further information regarding this loan program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Danville IL MA # 19180 is weaker than the bank's overall "High Satisfactory" performance in the state. Refer to Tables 1 through 12 in the state of Illinois section of appendix D for the facts and data that support these conclusions.

The weaker performance in the limited-scope AA of Danville, IL MA #19180 is attributed to the overall adequate performance in the distribution of loans among borrowers of different income levels versus the good performance for the state of Illinois. The weaker performance didn't lower the level of the bank's overall performance for Illinois.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Illinois is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Non MSA IL Counties is good.

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

In drawing our conclusions relative to this AA, we considered the complexity of the activity, the bank's capacity, degree of competition, credit and community credit needs of the AA, and available opportunities for investment. As described in the Market Profiles section in appendix C, we determined the opportunity to make qualified investments other than donations is limited.

ONB made \$1.5 million of qualified investments during the evaluation period, none of which were complex. The qualified investments consisted of \$1.4 million in a CRA QIF, a \$35,000 equity investment in a low-income housing tax credit project, and donations totaling \$70,000 to organizations that had a CD purpose.

Prior period investments consist of a \$100,000 equity investment in a community development corporation (CDC) and \$33,000 in a low-income housing tax credit which was used to fund one multifamily housing complex within this AA.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Danville, IL MA #19180 is weaker than the bank's overall "High Satisfactory" performance in the state. Refer to Table 14 in the state of Illinois section of appendix D for the facts and data that support these conclusions.

The weaker performance in the limited-scope AA of Danville, IL MA #19180 is attributed to the overall adequate performance versus the good performance for the state of Illinois. The weaker performance didn't lower the level of the bank's overall performance for Illinois.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Illinois is rated "Outstanding". Based on full-scope reviews, the bank's performance in the Non MSA IL Counties is excellent.

Retail Banking Services

Refer to Table 15 in the state of Illinois section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

ONB's service delivery systems are readily accessible to geographies and individuals of different income levels throughout the AA. The percentage of branches in low- and moderate-income geographies substantially exceeds the percentage of the population residing in those geographies, respectively. Branch openings and closings have not adversely affected the accessibility of ONB's delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. There were no branch openings in this AA. However, there was one branch closing in a middle-income geography.

ONB's hours and services offered throughout the AA are good. Office hours and services do not vary in a way that inconveniences its AA, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. Banking hours and services are provided Monday through Friday and are supplemented by Saturday hours at six of the 12 branch offices in this AA. One of ONB's branches located in an upper-income geography, within a grocery store, offers Sunday hours. The six branches that don't have Saturday hours are located in moderate- (two) and middle-income (four) geographies. There were no material differences in the services offered at the various branch locations.

ONB uses ATMs and online banking as alternative delivery systems for providing retail banking services to low- and moderate-income individuals and in low- and moderate-

income geographies. ONB has 15 full service and six cash dispense only ATMs located in this AA. The percentage of ATMs in low- and moderate-income geographies substantially exceeds the percentage of the population residing in these geographies, respectively. All of the ATMs located in low-income geographies and five of the 10 ATMs located in moderate-income geographies are full service. As previously stated, ONB's online banking isn't an effective means of providing retail banking services to low- and moderate-income individuals.

Community Development Services

ONB has provided a relatively high level of CD services in this AA. Although ONB's CD services have generally not been innovative, they have met some of the identified community needs. The CD services were related to affordable and temporary housing for low- and moderate-income individuals, promoting economic development, and community services to low- and moderate-income individuals. Approximately 30 organizations have benefited from ONB's participation. Examples of CD services include:

- Several ONB employees assisted with fund raising activities for a non-profit housing organization that provides affordable housing to low-income families.
- An ONB employee is the treasurer and prepares the financial statements for an organization that promotes economic development by operating a small business revolving loan fund. This organization provides loans to small businesses within a low-income geography which is targeted for revitalization by the City of Carbondale.
- An ONB employee assisted in fund raising activities and provided financial expertise related to money management to a social service agency that provides community services to low- and moderate-income individuals. This organization offers a substance abuse and rehabilitation center, services for the homeless, foster care services, services targeted to persons suffering with mental illness, and houses the Big Brothers and Big Sisters program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Danville, IL MA #19180 is not inconsistent with the bank's overall "Outstanding" performance under the service test in Illinois. Refer to Table 15 in the state of Illinois section of appendix D for the facts and data that support these conclusions.

State Rating

State of Indiana

CRA Rating for Indiana³: Satisfactory

The lending test is rated: **High Satisfactory**

The investment test is rated: **High Satisfactory**

The service test is rated: **Low Satisfactory**

The major factors that support this rating include:

- Lending levels are good.
- The geographic distribution of loans is adequate.
- The distribution of loans among borrowers of different income levels is good.
- Good CD lending had a positive impact on the lending test rating.
- Investment activity reflects a good level of responsiveness to identified community needs.
- ONB's service delivery systems are reasonably accessible to geographies and individuals of different income levels. The bank provides a relatively high level of CD services.

Description of Institution's Operations in Indiana

The state of Indiana represents 48 percent (\$2.7 billion) of ONB's total deposits. During the evaluation period, ONB originated and purchased 44 percent, 51 percent, and 67 percent of its total home mortgage loans, small loans to businesses, and small loans to farms, respectively, within the state of Indiana. ONB has 67 branch offices and 90 ATMs in Indiana. ONB has nine AAs and is the 4th largest bank in the state of Indiana in relation to deposits. Its AAs are a mixture of metropolitan and rural areas. ONB's primary competition includes JP Morgan Chase Bank, N.A., National City Bank, Fifth Third Bank, First Financial Bank, N.A., and Terre Haute Savings Bank. The AAs of Daviess, Dubois, Fountain, Jay, Knox, Grant, Martin, Orange, Parke, Perry, Randolph, Spencer, Warren, and Wayne Counties have the largest percentage of ONB's deposits, branches, and loans originated and purchased within the state of Indiana.

³ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state 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.

Refer to the market profiles for the state of Indiana in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Indiana

We selected three AAs to receive full-scope reviews consisting of the Non MA IN Counties (Daviess, Dubois, Fountain, Jay, Knox, Grant, Martin, Orange, Parke, Perry, Randolph, Spencer, Warren, and Wayne Counties), Indianapolis-Carmel, IN MA #26900 (Boone, Hamilton, Johnson, Marion, and Putnam Counties), and Terre Haute, IN MA #45460 (Vermillion and Vigo Counties). These AAs were chosen for a full-scope review because they had the largest percentage of deposits, branches, and loans originated and purchased within the state of Indiana. The remaining AAs of the Anderson, IN MA #11300, Bloomington, IN MA #14020 (only Monroe County), Elkhart–Goshen, IN MA #21140, Lafayette, IN MA #29140 (only Tippecanoe County), Muncie, IN MA #34620, and South Bend–Mishawaka, IN MA #43780 received a limited-scope review. Refer to the table in appendix A for additional information on the scope of our review.

We placed the most weight on the results of the full-scope AA of the Non MA IN Counties, then the Indianapolis-Carmel, IN MA #26900, and then the Terre Haute, IN MA #45460, because these three AAs had the largest percentages of ONB's deposits, branches, and loans originated and purchased within the state.

In the Non MA IN Counties, we determined the community's needs by contacting representatives from two economic development agencies, one social services agency, and four housing and social service agencies. In the Indianapolis-Carmel, IN MA #26900, we determined the community's needs by reviewing other CRA public evaluations and contacting representatives from a housing organization, three economic development corporations, and a local office of a national non-profit organization that supports CD organizations. We also reviewed the HUD Consolidated Housing and CD Plan for the city of Indianapolis. In the Terre Haute, IN MA # 45460, we determined the community's needs by contacting representatives from a non-profit housing organization and two economic development corporations. We also reviewed the HUD Consolidated Housing and CD Plan for the city of Terre Haute. See the Market Profiles for these three full-scope AA in appendix C for further information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Indiana is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Non MA IN Counties is good and in the Indianapolis-Carmel, IN MA #26900 and Terre Haute, IN MA #45460 is adequate.

Lending Activity

Refer to Table 1 Lending Volume in the state of Indiana section of appendix D for the facts and data used to evaluate the bank's lending activity.

ONB's lending activity in the Non MA IN Counties, Indianapolis-Carmel, IN MA #26900, and Terre Haute, IN MA #45460 is good, adequate, and adequate, respectively.

In the Non MA IN Counties, 40 percent, 33 percent, and 27 percent of the loans originated and purchased in this AA were home mortgage loans, small loans to businesses, and small loans to farms, respectively. In the Indianapolis-Carmel, IN MA #26900, 44 percent, 54 percent, and 2 percent of the loans originated and purchased in this AA were home mortgage loans, small loans to businesses, and small loans to farms, respectively. In the Terre Haute, IN MA #45460, 62 percent, 35 percent, and 3 percent of the loans originated and purchased in this AA were home mortgage loans, small loans to businesses, and small loans to farms, respectively.

Among home mortgage loans in the Non MA IN Counties, 31 percent, 31 percent, and 38 percent were home purchase, home improvement, and home mortgage refinance loans, respectively. Multifamily loans represented less than 1 percent of total loans in this AA. In the Indianapolis-Carmel, IN MA #26900, 35 percent, 35 percent, and 30 percent were home purchase, home improvement, and home mortgage refinance loans, respectively. Multifamily loans represented less than 1 percent of total loans in this AA. In the Terre Haute, IN MA #45460, 35 percent, 26 percent, and 39 percent were home purchase, home improvement, and home mortgage refinance loans, respectively. Multifamily loans represented less than 1 percent of total loans in this AA.

In the Non MA IN Counties, ONB lending activity is good given its deposit market share considering the large number of lending competitors operating in this AA. ONB ranks fifth in terms of deposits among depository institutions, with a 6 percent market share. According to 2007 aggregate HMDA data, ONB is the fourth largest, largest, and fourth largest originator and purchaser of home purchase, home improvement, and home mortgage refinance loans with a 5 percent, 27 percent, and 5 percent market share, respectively. ONB's lending levels are good, excellent, and good for home purchase, home improvement, and home mortgage refinance loans, respectively. ONB ranks seventh and first among all lenders for small loans to businesses and small loans to farms, respectively based on 2007 Aggregate CRA data with a 7 percent and 46 percent market share, respectively. ONB's lending levels are good and excellent for small loans to businesses and small loans to farms, respectively.

In the Indianapolis-Carmel, IN MA #26900, ONB lending activity is adequate given its deposit market share, especially considering the large number of lending competitors operating in the area. ONB ranks tenth in terms of deposits among depository institutions, with a 2 percent market share. According to 2007 aggregate HMDA data, ONB is the fifty-sixth largest, ninetieth largest, and fifty-third largest originator and purchaser of home purchase, home improvement, and home mortgage refinance loans with a .29 percent, 2 percent, and .33 percent market share, respectively. While ONB's market share and ranking of home purchase, home improvement, and home mortgage refinance loans is

lower than its deposit market share and ranking, we considered the performance adequate given the large number of mortgage lenders originating loans within the AA, many of which do not have a deposit taking facility within the AA. ONB ranks fifteenth and sixth among all lenders for small loans to businesses and small loans to farms, respectively based on 2007 Aggregate CRA data with a 1 percent and 4 percent market share, respectively. ONB's lending levels are adequate and excellent for small loans to businesses and small loans to farms, respectively. While ONB's market share of small loans to businesses is lower than its deposit market share, we considered ONB's performance adequate given the top seven lenders do not have a deposit taking facility within the AA.

In the Terre Haute, IN MA #45460, ONB lending activity is adequate given its deposit market share. ONB ranks second in terms of deposits among depository institutions, with a 21 percent market share. According to 2007 aggregate HMDA data, ONB is the fourth largest, second largest, and second largest originator and purchaser of home purchase, home improvement, and home mortgage refinance loans with a 7 percent, 27 percent, and 9 percent market share, respectively. ONB's lending levels are excellent for home improvement loans. While ONB's market share of home purchase and home mortgage refinance loans is lower than its deposit market share, we considered the performance adequate given the large number of mortgage lenders originating loans within the AA, many of which ONB ranks seventh and second among all lenders for small loans to businesses and small loans to farms, respectively, based on 2007 Aggregate CRA data with a 6 percent and 15 percent market share, respectively. ONB's lending levels are adequate for small loans to businesses and small loans to farms, respectively. While ONB's market share of small loans to businesses and small loans to farms is lower than its deposit market share, we considered the performance adequate given many of the top lenders do not have a deposit taking facility within the AA.

Distribution of Loans by Income Level of the Geography

The geographic distribution of ONB's home mortgage loans, small loans to businesses, and small loans to farms is adequate in the Non MA IN Counties, Indianapolis-Carmel, IN MA #26900, and Terre Haute, IN MA #45460.

In the Non MA IN Counties, we placed more weight on the distribution of small loans to businesses, then small loans to farms, and then home mortgage refinance loans because they represented the largest percentage of loans originated and purchased within the AA. In the Indianapolis-Carmel, IN MA #26900, we placed more weight on the distribution of small loans to businesses, then home improvement loans, and then home purchase loans because they represented the largest percentage of loans originated and purchased within the AA. In the Terre Haute, IN MA #45460, we placed more weight on the distribution of small loans to businesses, then home mortgage refinance loans, and then home purchase loans because they represented the largest percentage of loans originated and purchased within the AA.

The number of multifamily loans originated and purchased in all three of the above full scope AAs is not significant enough to perform a meaningful analysis. In the Non MA IN Counties AA, the number (two) of farms located in the one low-income geography is not

significant enough to perform a meaningful analysis. Additionally, there are no low-income geographies in the Terre Haute, IN MA #45460 AA.

Home Mortgage Loans

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

In evaluating the bank's performance in the Non MA Counties, we took into consideration there were limited opportunities to lend in the one low-income geography and more weight was placed on the performance in moderate-income geographies. There were only 580 owner-occupied housing units in the low-income geography.

Home Purchase Loans

In the Non MA Counties, the geographic distribution of home purchase loans is excellent. The portion of home purchase loans in the one low-income geography was lower than the portion of owner-occupied housing units within the geography. In 2007, the bank didn't originate and purchase any home purchase loans in the one low-income geography. Consequently, ONB showed a market share of 0 percent for this geography. The portion of home purchase loans in moderate-income geographies was near the portion of owner-occupied housing units within those geographies. However, the bank's market share of loans in moderate-income geographies exceeded the bank's overall market share.

In the Indianapolis-Camel, IN MA #26900, the geographic distribution of home purchase loans is poor. The portion of home purchase loans in low-income geographies was significantly lower than the portion of owner-occupied housing units within those geographies. The bank's market share of loans in low-income geographies was significantly lower than the bank's overall market share. The portion of home purchase loans in moderate-income geographies was lower than the portion of owner-occupied housing units within those geographies. However, the bank's market share of loans in moderate-income geographies was near the bank's overall market share.

In the Terre Haute, IN MA #45460, the geographic distribution of home purchase loans is adequate. The portion of home purchase loans in moderate-income geographies was somewhat lower than the portion of owner-occupied housing units within those geographies. The bank's market share of loans in moderate-income geographies was lower than the bank's overall market share.

Home Improvement Loans

In the Non MA Counties, the geographic distribution of home improvement loans is good. The portion of home improvement loans in the one low-income geography was somewhat lower than the portion of owner-occupied housing units within the geography. The bank's market share of loans in the low-income geography was significantly lower than the bank's overall market share. The portion of home improvement loans in moderate-income geographies was near the portion of owner-occupied housing units within those

geographies. The bank's market share of loans in moderate-income geographies was somewhat lower than the bank's overall market share.

In the Indianapolis-Camel, IN MA #26900, the geographic distribution of home improvement loans is good. The portion of home improvement loans in low-income geographies equaled the portion of owner-occupied housing units within those geographies. In 2007, the bank didn't originate and purchase any home improvement loans in low-income geographies. Consequently, ONB showed a market share of 0 percent for these geographies. The portion of home improvement loans in moderate-income geographies exceeded the portion of owner-occupied housing units within those geographies. The bank's market share of loans in moderate-income geographies was somewhat lower than the bank's overall market share.

In the Terre Haute, IN MA #45460, the geographic distribution of home improvement loans is adequate. The portion of home improvement loans in moderate-income geographies was somewhat lower than the portion of owner-occupied housing units within those geographies. The bank's market share of loans in moderate-income geographies was somewhat lower than the bank's overall market share.

Home Mortgage Refinance Loans

In the Non MA Counties, the geographic distribution of home mortgage refinance loans is adequate. The portion of home mortgage refinance loans in the one low-income geography exceeded the portion of owner-occupied housing units within the geography. The bank's market share of loans in the low-income geography exceeded the bank's overall market share. The portion of home mortgage refinance loans in moderate-income geographies was somewhat lower than the portion of owner-occupied housing units within those geographies. The bank's market share of loans in moderate-income geographies was lower than the bank's overall market share.

In the Indianapolis-Camel, IN MA #26900, the geographic distribution of home mortgage refinance loans is poor. The portion of home mortgage refinance loans in low-income geographies was significantly lower than the portion of owner-occupied housing units within those geographies. The bank's market share of loans in low-income geographies was significantly lower than the bank's overall market share. The portion of home mortgage refinance loans in moderate-income geographies was lower than the portion of owner-occupied housing units within those geographies. The bank's market share of loans in moderate-income geographies was lower than the bank's overall market share.

In the Terre Haute, IN MA #45460, the geographic distribution of home mortgage refinance loans is poor. The portion of home mortgage refinance loans in moderate-income geographies was lower than the portion of owner-occupied housing units within those geographies. The bank's market share of loans in moderate-income geographies was lower than the bank's overall market share.

Small Loans to Businesses

Refer to Table 6 in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

In the Non MA IN Counties, the geographic distribution of small loans to businesses is adequate. In evaluating the bank's performance, we took into consideration there were limited opportunities to lend in the one low-income geography and more weight was placed on the performance in moderate-income geographies. There were only 626 businesses in the one low-income geography. The portion of small loans to businesses in the one low-income geography was lower than the portion of businesses within those geographies. The bank's market share of loans in the low-income geography was somewhat lower than the bank's overall market share. The portion of small loans to businesses in moderate-income geographies was somewhat lower than the portion of businesses within those geographies. The bank's market share of loans in moderate-income geographies was lower than the bank's overall market share.

In the Indianapolis-Carmel, IN MA #26900, the geographic distribution of small loans to businesses is adequate. The portion of small loans to businesses in low-income geographies was somewhat lower than the portion of businesses within those geographies. However, the bank's market share of loans in low-income geographies exceeded the bank's overall market share. The portion of small loans to businesses in moderate-income geographies was somewhat lower than the portion of businesses within those geographies. The bank's market share of loans in moderate-income geographies was somewhat lower than the bank's overall market share.

In the Terre Haute, IN MA #45460, the geographic distribution of small loans to businesses is excellent. The portion of small loans to businesses in moderate-income geographies exceeded the portion of businesses within those geographies. The bank's market share of loans in moderate-income geographies exceeded the bank's overall market share.

Small Loans to Farms

Refer to Table 7 in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to farms.

In the Non MA IN Counties, the geographic distribution of small loans to farms is very poor. The portion of small loans to farms in moderate-income geographies was significantly lower than the portion of farms within those geographies. The bank's market share of loans in moderate-income geographies was lower than the bank's overall market share.

In the Indianapolis-Carmel, IN MA #26900, the geographic distribution of small loans to farms is good. In evaluating the bank's performance, we took into consideration there were limited opportunities to lend in low-income geographies and more weight was placed on the performance in moderate-income geographies. There were only 45 farms in low-income geographies. ONB didn't originate any small loans to farms in low-income geographies. The portion of small loans to farms in moderate-income geographies exceeded the portion of farms within those geographies. The bank's market share of loans in moderate-income geographies exceeded the bank's overall market share.

In the Terre Haute, IN MA #45460, the geographic distribution of small loans to farms is adequate. In evaluating the bank's performance, we took into consideration there were limited opportunities to lend in moderate-income geographies as there were only 23 farms in these geographies. The portion of small loans to farms in moderate-income geographies was significantly lower than the portion of farms within those geographies. The bank's market share of loans in moderate-income geographies exceeds the bank's overall market share.

Lending Gap Analysis

We reviewed summary reports detailing ONB's lending activity over the evaluation period for home mortgage loans, small loans to businesses, and small loans to farms to identify gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in lending.

Inside/Outside Ratio

The inside/outside ratio analysis was conducted at the bank level. Refer to Evansville-Henderson, IN-KY MA #21780.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of home mortgage loans and small loans to businesses reflects good dispersion among borrowers of different income levels in the in the Non MA IN Counties, Indianapolis-Carmel, IN MA #26900, and Terre Haute, IN MA #45460, respectively.

In December 2006, ONB management made a business decision to underwrite small loans to businesses and small loans to farms without revenue information. A majority of the small loans to farm loans did not have revenue information. Consequently, a meaningful analysis couldn't be performed. In evaluating the bank's performance of small loans to businesses, we took into consideration that 33 percent, 17 percent, and 19 percent of these loans in the Non MSA IN Counties, Indianapolis-Carmel, IN MA # 26900, and Terre Haute, IN MA # 45460, respectively did not have revenue information.

In the Non MA IN Counties, we placed more weight on the distribution of small loans to businesses, then home mortgage refinance loans, and then home improvement loans because they represented the largest percentage of loans originated and purchased within the AA. In the Indianapolis-Carmel, IN MA #26900, we placed more weight on the distribution of small loans to businesses, then home improvement loans, and then home purchase loans because they represented the largest percentage of loans originated and purchased within the AA. In the Terre Haute, IN MA #45460, we placed more weight on the distribution of small loans to businesses, then home mortgage refinance loans, and then home purchase loans because they represented the largest percentage of loans originated and purchased within the AA.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In evaluating the borrower distribution of home mortgage loans, we considered the percentage of families who live below the poverty level and the barriers this may have on home ownership. The percent of families that live below the poverty level in the Non MA IN Counties, Indianapolis-Carmel, IN MA #26900, and Terre Haute, IN MA #45460 was 8 percent, 7 percent, and 10 percent, respectively.

Home Purchase Loans

In the Non MA IN Counties, ONB does a good job of addressing the low- and moderate-income borrower credit needs for home purchase loans. The portion of home purchase loans to low-income borrowers was somewhat lower than the portion of AA families who are low-income. The bank's market share of loans to low-income borrowers was somewhat lower than the bank's overall market share. The portion of home purchase loans to moderate-income borrowers exceeded the portion of AA families who are moderate-income. The bank's market share of loans to moderate-income borrowers was near the bank's overall market share.

In the Indianapolis-Carmel, IN MA #26900, ONB does a good job of addressing the low- and moderate-income borrower credit needs for home purchase loans. The portion of home purchase loans to low-income borrowers was lower than the portion of AA families who are low-income. The bank's market share of loans to low-income borrowers was somewhat lower than the bank's overall market share. The portion of home purchase loans to moderate-income borrowers exceeded the portion of AA families who are moderate-income. The bank's market share of loans to moderate-income borrowers exceeded the bank's overall market share.

In the Terre Haute, IN MA #45460, ONB does an adequate job of addressing the low- and moderate-income borrower credit needs for home purchase loans. The portion of home purchase loans to low-income borrowers was lower than the portion of AA families who are low-income. The bank's market share of loans to low-income borrowers was somewhat lower than the bank's overall market share. The portion of home purchase loans to moderate-income borrowers was near the portion of AA families who are moderate-income. The bank's market share of loans to moderate-income borrowers was near the bank's overall market share.

Home Improvement Loans

In the Non MA IN Counties, ONB does a good job of addressing the low- and moderate-income borrower credit needs for home improvement loans. The portion of home improvement loans to low-income borrowers was lower than the portion of AA families who are low-income. The bank's market share of loans to low-income borrowers was near the bank's overall market share. The portion of home improvement loans to moderate-income borrowers exceeded the portion of AA families who are moderate-income. The bank's

market share of loans to moderate-income borrowers was near the bank's overall market share.

In the Indianapolis-Carmel, IN MA #26900, ONB does a good job of addressing the low- and moderate-income borrower credit needs for home improvement loans. The portion of home improvement loans to low-income borrowers was lower than the portion of AA families who are low-income. The bank's market share of loans to low-income borrowers was lower than the bank's overall market share. The portion of home improvement loans to moderate-income borrowers exceeded the portion of AA families who are moderate-income. The bank's market share of loans to moderate-income borrowers was lower than the bank's overall market share.

In the Terre Haute, IN MA #45460, ONB does a good job of addressing the low- and moderate-income borrower credit needs for home improvement loans. The portion of home improvement loans to low-income borrowers was lower than the portion of AA families who are low-income. The bank's market share of loans to low-income borrowers was somewhat lower than the bank's overall market share. The portion of home improvement loans to moderate-income borrowers was near the portion of AA families who are moderate-income. The bank's market share of loans to moderate-income borrowers was somewhat lower than the bank's overall market share.

Home Mortgage Refinance Loans

In the Non MA IN Counties, ONB does an adequate job of addressing the low- and moderate-income borrower credit needs for home mortgage refinance loans. The portion of home mortgage refinance loans to low-income borrowers was lower than the portion of AA families who are low-income. The bank's market share of loans to low-income borrowers was somewhat lower than the bank's overall market share. The portion of home mortgage refinance loans to moderate-income borrowers was near the portion of AA families who are moderate-income. The bank's market share of loans to moderate-income borrowers was somewhat lower than the bank's overall market share.

In the Indianapolis-Carmel, IN MA #26900, ONB does an adequate job of addressing the low- and moderate-income borrower credit needs for home mortgage refinance loans. The portion of home mortgage refinance loans to low-income borrowers was lower than the portion of AA families who are low-income. The bank's market share of loans to low-income borrowers was lower than the bank's overall market share. The portion of home mortgage refinance loans to moderate-income borrowers was near the portion of AA families who are moderate-income. The bank's market share of loans to moderate-income borrowers was somewhat lower than the bank's overall market share.

In the Terre Haute, IN MA #45460, ONB does an adequate job of addressing the low- and moderate-income borrower credit needs for home purchase loans. The portion of home mortgage refinance loans to low-income borrowers was significantly lower than the portion of AA families who are low-income. The bank's market share of loans to low-income borrowers was lower than the bank's overall market share. The portion of home mortgage refinance loans to moderate-income borrowers was near the portion of AA families who are moderate-income. The bank's market share of loans to moderate-income borrowers was near the bank's overall market share.

Small Loans to Businesses

Refer to Table 11 in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

In the Non MSA IN Counties, the borrower distribution of small loans to businesses is good. The portion of loans extended to businesses with revenues of \$1 million or less was somewhat lower than the portion of area businesses that have revenue levels of \$1 million or less. The bank's market share to the \$1 million or less borrowers was lower than the bank's overall market share.

In the Indianapolis-Carmel, IN MA #26900, the borrower distribution of small loans to businesses is good. The portion of loans extended to businesses with revenues of \$1 million or less was lower than the portion of area businesses that have revenue levels of \$1 million or less. The bank's market share to the \$1 million or less borrowers exceeded the bank's overall market share.

In the Terre Haute, IN MA #45460, the borrower distribution of small loans to businesses is good. The portion of loans extended to businesses with revenues of \$1 million or less was somewhat lower than the portion of area businesses that have revenue levels of \$1 million or less. The bank's market share to the \$1 million or less borrowers exceeded the bank's overall market share.

Small Loans to Farms

Refer to Table 12 in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

Community Development Lending

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

In the Non MSA IN Counties, the bank's level of CD lending had a positive impact on the lending test rating. As a result, the bank's lending test rating for this AA was raised to High Satisfactory. ONB originated 14 CD loans in this AA for a total of \$22 million dollars. ONB's CD loans consisted of three loans that provided affordable housing to low- and moderate-income individuals, seven loans that supported revitalization efforts, and four loans to organizations that provide community services to low- and moderate-income individuals. The following examples highlight ONB's CD lending in the AA:

- ONB originated a \$6.5 million loan to fund an expansion of a manufacturing facility in a designated distressed or underserved non-metropolitan middle-income geography. The expansion of the manufacturing facility will assist in revitalizing and stabilizing this geography by creating permanent jobs for low- and moderate-income individuals. This company currently employs 275 individuals. It is anticipated that 15 additional employees will be hired at salaries that fall into the low- or moderate-income range for this AA.
- ONB originated an \$800,000 loan to help fund the construction of a 31-unit housing complex for low-income seniors. Low-income housing tax credits were also used to fund this project.

In the Indianapolis-Carmel, IN MA #26900, the bank's level of CD lending had a positive impact on the lending test rating. ONB originated 20 CD loans in this AA for a total of \$59 million dollars. ONB's CD loans consisted of six loans that provided affordable housing to low- and moderate-income individuals, one loan that promoted economic development, eight loans that supported revitalization efforts, and five loans to organizations that provide community services to low- and moderate-income individuals. The following examples highlight ONB's CD lending in the AA:

- ONB originated a \$5 million line of credit to fund the operations of a manufacturing facility in a moderate-income geography. This loan will assist in revitalizing and stabilizing this geography by retaining approximately 275 jobs to individuals whose salaries fall into the low- and moderate-income range for this AA.
- ONB originated a \$1 million loan to fund the acquisition of a new facility to a non-profit organization that provides community services consisting of medical, dental, housing, nutrition, legal assistance, transportation, and other services primarily to low- and moderate-income individuals.

In the Terre Haute, IN MA #45460, the bank's level of CD lending had a positive impact on the Lending Test Rating. ONB originated two CD loans in this AA totaling \$4.7 million. Both loans were made to the same small business, a manufacturer, which assisted in promoting economic development. Loan proceeds were used to retain approximately 220 jobs and create an additional 20 jobs, primarily to low- and moderate-income individuals.

Product Innovation and Flexibility

In the Non MSA IN Counties, ONB used one non-proprietary affordable mortgage loan product (USDA Rural Housing Loans) to meet the affordable housing needs of low- and moderate-income individuals. The use of this loan product had a neutral impact on the lending test. ONB originated 11 loans totaling \$751,000. Refer to the Evansville-Henderson, IN-KY MA #21780 section of this evaluation for further information regarding this loan program.

In the Terre Haute, IN MA #45460, ONB didn't present any innovative or flexible loan products for our consideration.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Bloomington, IN MA #14020, Elkhart-Goshen, IN MA #21140, Lafayette, IN MA #29140 Muncie, IN MA #34620, and South Bend-Mishawaka, IN MA #43780 is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test in Indiana. In the Anderson, IN MA #11300, the bank's performance is stronger than the bank's overall performance in the state. Refer to the Tables 1 through 12 in the state of Indiana section of appendix D for the facts and data that support these conclusions.

The stronger performance in the limited scope AA of Anderson, IN MA # 11300 is attributed to the overall good performance in the geographic and borrower distribution of loans and the excellent CD lending. The stronger performance didn't impact the overall "High Satisfactory" performance for Indiana.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Indiana is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Non MA IN Counties and Indianapolis-Carmel, IN MA #26900 is good and in the Terre Haute, IN MA #45460 is adequate.

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

In drawing our conclusions relative to the above three AAs, we considered the complexity of the activity, the bank's capacity, degree of competition, credit and community credit needs of the AAs, and available opportunities for investment. As described in the Market Profiles section in appendix C, we determined the opportunity to make qualified investments other than donations is limited in the Non MA IN Counties and Terre Haute, IN MA #45460 and is ample in the Indianapolis-Carmel, IN MA #26900.

In the Non MA IN Counties, ONB made \$4.6 million of qualified investments during the evaluation period, none of which were complex. The qualified investments consisted of \$4.4 million in a CRA QIF and donations totaling \$218,000 to organizations that had a CD purpose. ONB has low-income housing tax credits, totaling \$637,000, from prior evaluation periods that remain outstanding. These tax credits were used to fund multifamily housing complexes within this AA.

In the Indianapolis-Carmel, IN MA #26900, ONB made \$2.3 million of qualified investments during the evaluation period, none of which were complex. The qualified investments consisted of \$2 million in a CRA QIF and donations totaling \$268,000 to organizations that had a CD purpose. ONB didn't have any prior period investments.

In the Terre Haute, IN MA #45460, ONB made \$56,000 of non complex qualified investments during the evaluation period consisting entirely of donations to organizations

that had a CD purpose. ONB has low-income housing tax credits, totaling \$200,000, from prior evaluation periods that remain outstanding. The tax credits were used to fund multifamily housing complexes within this AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Anderson, IN MA #11300, Bloomington, IN MA #14020, Elkhart-Goshen, IN MA #21140, Lafayette, IN MA #29140, Muncie, IN MA #34620, and South Bend-Mishawaka, IN MA #43780 is not inconsistent with the bank's overall "High Satisfactory" performance under the investment test in Indiana. Refer to the Table 14 in the state of Indiana section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Indiana is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Non MA IN Counties and Terre Haute, IN MA #45460 is excellent and adequate, respectively. In the Indianapolis-Carmel, IN MA #26900, the bank's performance is poor.

Retail Banking Services

Refer to Table 15 in the state of Indiana section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

In the Non MA IN Counties, ONB's service delivery systems are readily accessible to geographies and individuals of different income levels throughout the AA. The percentage of branches in low- and moderate-income geographies substantially exceeds the percentage of the population residing in these geographies, respectively. Branch openings and closings have not adversely affected the accessibility of ONB's delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. There were no branch openings in this AA. However, there were two branch closings in a middle- and an upper-income geography. There were no material differences in the services offered at the various branch locations.

In the Non MA IN Counties, ONB's hours and services offered throughout the AA are good. Office hours and services do not vary in a way that inconveniences its AA, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. Banking hours and services are provided Monday through Friday and are supplemented by Saturday hours at 20 of the 31 branch offices in this AA. The 11 branches that don't have Saturday hours are located in moderate- (4), middle- (6), and upper-income (1) geographies.

In the Non MA IN Counties, ONB uses ATMs and online banking as alternative delivery systems for providing retail banking services to low- and moderate-income individuals and

in low- and moderate-income geographies. ONB has 28 full service and eight cash dispense only ATMs located in this AA. The percentage of ATMs in low- and moderate-income geographies exceeds and is near the percentage of the population residing in these geographies, respectively. The one ATM in the one low-income geography and four of the five ATMs located in moderate-income geographies are full service. As previously stated, ONB's online banking isn't an effective means of providing retail banking services to low- and moderate-income individuals.

In the Indianapolis-Carmel, IN MA #26900, ONB's service delivery systems are unreasonably inaccessible to portions of its AA area, particularly in low- or moderate-income geographies and to low- and moderate-income individuals. The percentage of the population residing in low- and moderate-income geographies is 6 percent and 26 percent, respectively. None of ONB's 12 branches in this AA are located in low- or moderate-income geographies. Branch openings and closings have generally not adversely affected the accessibility of ONB's delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. There were no branch closings in this AA. However, there were four branch openings in middle-(one) and upper-income (three) geographies.

In the Indianapolis-Carmel, IN MA #26900, ONB's hours and services offered throughout the AA are adequate. Office hours and services do not vary in a way that inconveniences its AA. Banking hours and services are provided Monday through Friday and are supplemented by Saturday hours at 11 of the 12 branch offices in this AA. The one branch that doesn't have Saturday hours is located in a middle-income geography. There were no material differences in the services offered at the various branch locations.

In the Indianapolis-Carmel, IN MA #26900, ONB's use of alternative delivery systems for providing retail banking services to low- and moderate-income individuals and in low- and moderate-income geographies isn't effective. Although ONB allows its customers free use of all proprietary and non-proprietary ATMs within this AA, none of ONB's 12 full service and one cash dispense only ATMs in this AA are located in low- or moderate-income geographies. See previous comments for why on-line banking isn't effective.

In the Terre Haute, IN MA #45460, ONB's service delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the AA. There are no low-income geographies in this AA. The percentage of branches in moderate-income geographies (17 percent) is reasonable given 25 percent of the population resides in moderate-income geographies. There were no branch openings or closings in this AA.

In the Terre Haute, IN MA #45460, ONB's hours and services offered throughout the AA are good. Office hours and services do not vary in a way that inconveniences its AA, particularly in moderate-income geographies and to low- and moderate-income individuals. Banking hours and services are provided Monday through Friday and are supplemented by Saturday hours at five of the six branch offices in this AA. The one branch that doesn't have Saturday hours is located in a middle-income geography. There were no material differences in the services offered at the various branch locations.

In the Terre Haute, IN MA #45460, ONB uses ATMs and online banking as alternative delivery systems for providing retail banking services to low- and moderate-income individuals and in moderate-income geographies. ONB has six full service and 10 cash dispense only ATMs located in this AA. The percentage of ATMs in moderate-income geographies (19 percent) is reasonable given 25 percent of the population resides in moderate-income geographies. However, all three of the ATMs located in the moderate-income geographies are cash dispense only. Consequently, the use of ATMs as an alternative for providing retail banking services in moderate-income geographies isn't very effective. As previously stated, ONB's online banking isn't an effective means of providing retail banking services to low- and moderate-income individuals.

Community Development Services

In the Non MA IN Counties, ONB has provided a relatively high level of CD services in this AA. Although ONB's CD services have generally not been innovative, they have met some of the identified community needs. CD services were related to affordable housing for low- and moderate-income individuals, promoting economic development by financing small businesses, and community services targeted to low- and moderate-income individuals. Approximately 40 organizations have benefited from ONB's participation. Examples of CD services include:

- ONB employees are Board, committee members, or both for several organizations that promote economic development by operating small business revolving loan funds. Their duties include reviewing loan applications and providing technical advice regarding their lending programs.
- An ONB employee assisted a non-profit housing organization in preparing a Federal Home Loan Bank AHP grant application with proceeds to be used for a low- and moderate-income affordable housing project.
- An ONB employee assisted with fund raising activities for an organization that provides a food pantry and other community services for low- and moderate-income families and senior citizens.

In the Indianapolis-Carmel, IN MA #26900, ONB has provided a relatively high level of CD services in this AA. Although ONB's CD services have generally not been innovative, they have met some of the identified community needs. CD services were related to affordable housing for low- and moderate-income individuals, promoting economic development by financing small businesses, and community services targeted to low- and moderate-income individuals. Approximately 35 organizations have benefited from ONB's participation in providing CD services. Examples of CD services include:

- ONB employees are Board members, committee members, or both at two entities that promote economic development by operating small business micro loan programs and originating SBA 504 loans. As part of their duties they review loan applications and provide technical advice regarding their lending programs.

- ONB employees assisted a non-profit organization in preparing a Federal Home Loan Bank AHP grant application, with the \$500,000 in proceeds used to renovate a blighted hotel and convert it to a shelter for domestic violence victims. The center includes 38 permanent affordable housing units primarily for low- and moderate-income families. The center also provides recreational activities for children and case management services for victims of violence.
- An ONB employee is a board member whose duties include assisting with fund raising activities and preparing budgets for a non-profit organization that promotes low- and moderate-income affordable housing. Additionally, this entity offers several services including financial education classes, pre-purchase mortgage and credit counseling, buyer education classes, direct lending, down payment assistance, and home repair. In fiscal year 2008, this entity provided home ownership assistance to 1,680 families, educated 1,096 families through the various education programs, and assisted 267 families in achieving home ownership or home repair.

In the Terre Haute, IN MA #45460, ONB has provided an adequate level of CD services. Although ONB's CD services have generally not been innovative, they have met some of the identified community needs. CD services were related to affordable housing for low- and moderate-income individuals, promoting economic development, and community services targeted to low- and moderate-income individuals. Approximately 15 organizations have benefited from ONB's participation in providing CD services. Examples of CD services include:

- An ONB employee is a Board member whose duties include assisting with fund raising activities and preparing budgets for a non-profit housing organization that provides decent and affordable housing to low- and moderate-income families. In addition, this organization operates a retail thrift store in which usable building materials and working appliances are accepted for resale with proceeds used to fund additional projects.
- An ONB employee serves as a Board member for an economic development corporation that promotes economic development by operating a small business micro loan program. The CD services included reviewing loan applications, offering financial advice to small businesses, and preparing operating budgets.
- An ONB employee serves as a Board member for a Catholic charity that operates a food bank and provides other community services to low- and moderate-income individuals. The CD services included providing technical advice on financial matters and analysis of the various programs and projects offered by this organization.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Anderson, IN MA #11300, Elkhart-Goshen, IN MA #21140, Lafayette, IN MA #29140, Muncie, IN MA #34620, and South Bend-Mishawaka, IN MA #43780 is not inconsistent with the bank's overall "Low Satisfactory" performance under the service test in Indiana. In the Bloomington, IN MA #14020 the bank's performance is stronger than the bank's overall

performance in the state. Refer to Table 15 in the state of Indiana section of appendix D for the facts and data that support these conclusions.

The stronger performance in the Bloomington, IN MA #14020 is attributed to the fact the percentage of the branches in low- and moderate-income geographies exceeds the percentage of the population residing in those geographies, respectively. The stronger performance didn't impact the overall "Low Satisfactory" performance for Indiana.

State Rating

State of Kentucky

CRA Rating for Kentucky⁴: Satisfactory

The lending test is rated: **Low Satisfactory**

The investment test is rated: **High Satisfactory**

The service test is rated: **Outstanding**

The major factors that support this rating include:

- Lending levels are adequate.
- The geographic distribution of loans among geographies is adequate.
- The distribution of loans among borrowers of different income levels is adequate.
- Investment activity reflects a good level of responsiveness to identified community needs.
- ONB's service delivery systems are readily accessible to geographies and individuals of different income levels. The bank provides an adequate level of CD services.

Description of Institution's Operations in Kentucky

The state of Kentucky represents 9 percent (\$500 million) of ONB's total deposits. During the evaluation period, ONB originated and purchased 16 percent, 13 percent, and 8 percent of its total home mortgage loans, small loans to businesses, and small loans to farms, respectively, within the state of Kentucky. ONB has 14 branch offices and 15 ATMs in Kentucky. ONB has three AAs and is the 20th largest bank in the state of Kentucky in relation to deposits. Its AAs are a mixture of metropolitan and rural areas. ONB's primary competition includes Fifth Third Bank, First United Bank and Trust Company, Branch Banking and Trust Company, and National City Bank. The AA of Hopkins, Muhlenberg, and Union Counties has the largest percentage of ONB's deposits, branches, and loans originated and purchased within the state of Kentucky.

Refer to the market profiles for the state of Kentucky in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

⁴ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state 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.

Scope of Evaluation in Kentucky

We selected the AA of the Non MA KY Counties (Hopkins, Muhlenberg, and Union Counties) to receive a full scope review. This AA was chosen for a full-scope review because it had the largest percentage of deposits, branches, and loans originated and purchased within the state of Kentucky. The remaining AAs of the Owensboro, KY MA #36980 (only Daviess County) and Louisville-Jefferson County, KY-IN MA #31140 (only Jefferson County) received a limited-scope review. Refer to the table in appendix A for additional information on the scope of our review.

We determined the community's needs by contacting representatives from a community based development corporation and a social service agency. See the Market Profile for the Non MSA KY Counties in appendix C for further information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Kentucky is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Non MA KY Counties is adequate.

Lending Activity

Refer to Table 1 Lending Volume in the state of Kentucky section of appendix D for the facts and data used to evaluate the bank's lending activity.

ONB's lending activity is adequate in the Non MA KY Counties. During this evaluation period, 64 percent, 28 percent, and 8 percent of the loans originated and purchased in this AA were home mortgage loans, small loans to businesses, and small loans to farms, respectively. Among home mortgage loans, 24 percent, 35 percent, and 41 percent were home purchase, home improvement, and home mortgage refinance, respectively. Multifamily loans represented less than 1 percent of total loans in this AA.

ONB's lending activity is adequate given its deposit market share, especially considering the large number of lending competitors operating in this AA. ONB ranks first in terms of deposits among depository institutions, with a 30 percent market share. According to 2007 aggregate HMDA data, ONB is the largest originator and purchaser of home purchase, home improvement, and home mortgage refinance loans with a 15 percent, 56 percent, and 20 percent market share, respectively. ONB's lending levels are excellent for home improvement loans. While ONB's market share of home purchase and home mortgage refinance loans is lower than its deposit market share, we considered the performance adequate given the large number of mortgage lenders originating loans within the AA, many of which do not have a deposit taking facility within the AA. ONB ranks third and first among all lenders for small loans to businesses and small loans to farms, respectively based on 2007 Aggregate CRA data with an 11 percent and 43 percent market share, respectively. ONB's lending levels are adequate and excellent for small loans to businesses and small loans to farms, respectively. While ONB's market share of small

loans to businesses is lower than its deposit market share, we considered their performance adequate, given the top eight lenders, excluding ONB, do not have a deposit taking facility within the AA.

Distribution of Loans by Income Level of the Geography

The geographic distribution of ONB's home mortgage loans and small loans to businesses in the Non MA KY Counties is adequate. There are no low-income geographies in this AA. The number of multifamily loans originated and purchased in this AA and the number of farms located in the one moderate-income geography is not significant enough to perform a meaningful analysis. Dunn and Bradstreet data indicates there are only five farms located in the one moderate income geography.

In the AA, we placed the most weight on the distribution of small loans to businesses, then home mortgage refinance loans, and then home improvement loans because they represented the largest percentage of loans originated and purchased within the AA.

Home Mortgage Loans

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

Home Purchase Loans

The geographic distribution of home purchase loans is good. The portion of home purchase loans in the one moderate-income geography exceeded the portion of owner-occupied housing units within that geography. The bank's market share of loans in the one moderate-income geography was near the bank's overall market share.

Home Improvement Loans

The geographic distribution of home improvement loans is excellent. The portion of home improvement loans in the one moderate-income geography exceeded the portion of owner-occupied housing units within that geography. The bank's market share of loans in the one moderate-income geography exceeded the bank's overall market share.

Home Mortgage Refinance Loans

The geographic distribution of home mortgage refinance loans is adequate. The portion of home mortgage refinance loans in the one moderate-income geography was lower than the portion of owner-occupied housing units within that geography. However, the bank's market share of loans in moderate-income geographies exceeded the bank's overall market share.

Small Loans to Businesses

Refer to Table 6 in the state of Kentucky section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The geographic distribution of small loans to businesses is poor. The portion of small loans to businesses in the one moderate-income geography was lower than the portion of businesses within the geography. The bank's market share of loans in the one moderate-income geography was lower than the bank's overall market share.

Lending Gap Analysis

We reviewed summary reports detailing ONB's lending activity over the evaluation period for home mortgage loans, small loans to businesses, and small loans to farms to identify gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in lending.

Inside/Outside Ratio

The inside/outside ratio analysis was conducted at the bank level. Refer to Evansville-Henderson, IN-KY MA #21780.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of home mortgage loans and small loans to businesses reflects adequate dispersion among borrowers of different income levels in the Non MA KY Counties.

In December 2006, ONB management made a business decision to underwrite small loans to businesses and small loans to farms without revenue information. A majority of the small loans to farm loans did not have revenue information. Consequently, a meaningful analysis couldn't be performed. In evaluating the bank's performance of small loans to businesses, we took into consideration that 40 percent of these loans in this AA did not have revenue information.

In the AA, we placed the most weight on the distribution of small loans to businesses, then home mortgage refinance loans, and then home improvement loans because they represent the largest percentage of loans originated and purchased within the AA.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the state of Kentucky section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In evaluating the borrower distribution of home mortgage loans, we considered the percentage of families (14 percent) who live below the poverty level and the barriers this may have on home ownership.

Home Purchase Loans

ONB does a good job of addressing the low- and moderate-income borrower credit needs for home purchase loans. The portion of home purchase loans to low-income borrowers was significantly lower than the portion of AA families who are low-income. However, the bank's market share of loans to low-income borrowers exceeded the bank's overall market share. The portion of home purchase loans to moderate-income borrowers was near the portion of AA families who are moderate-income. However, the bank's market share of loans to moderate-income borrowers exceeded the bank's overall market share.

Home Improvement Loans

ONB does an adequate job of addressing the low- and moderate-income borrower credit needs for home improvement loans. The portion of home improvement loans to low-income borrowers was significantly lower than the portion of AA families who are low-income. The bank's market share of loans to low-income borrowers was lower than the bank's overall market share. The portion of home improvement loans to moderate-income borrowers exceeded the portion of AA families who are moderate-income. The bank's market share of loans to moderate-income borrowers exceeded the bank's overall market share.

Home Mortgage Refinance Loans

ONB does a poor job of addressing the low- and moderate-income borrower credit needs for home mortgage refinance loans. The portion of home mortgage refinance loans to low-income borrowers was significantly lower than the portion of AA families who are low-income. The bank's market share of loans to low-income borrowers was significantly lower than the bank's overall market share. The portion of home mortgage refinance loans to moderate-income borrowers was somewhat lower than the portion of AA families who are moderate-income. The bank's market share of loans to moderate-income borrowers was somewhat lower than the bank's overall market share.

Small Loans to Businesses

Refer to Table 11 in the state of Kentucky section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is good. The portion of loans extended to businesses with revenues of \$1 million or less exceeded the portion of area businesses that have revenue levels of \$1 million or less. The bank's market share to the \$1 million or less borrowers was somewhat lower than the bank's overall market share.

Small Loans to Farms

Refer to Table 12 in the state of Kentucky section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

Community Development Lending

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

ONB did not originate any CD loans in this AA.

Product Innovation and Flexibility

ONB used one non-proprietary affordable mortgage loan product (USDA Rural Housing Loans) to meet the affordable housing needs of low- and moderate-income individuals. The use of this loan product had a neutral impact on the lending test. ONB originated two loans totaling \$139,000. Refer to the Evansville-Henderson, IN-KY MA #21780 section of this evaluation for further information regarding this loan program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Louisville-Jefferson County, KY-IN MA #31140 and Owensboro, KY MA #36980 is not inconsistent with the bank's overall "Low Satisfactory" performance under the lending test in Kentucky.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

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

In drawing our conclusions relative to this AA, we considered the complexity of the activity, the bank's capacity, degree of competition, credit and community credit needs of the AA, and available opportunities for investment. As described in the Market Profiles section in appendix C, we determined the opportunity to make qualified investments other than donations is extremely limited.

ONB made \$1.6 million of qualified investments during the evaluation period, none of which were complex. The qualified investments consisted of \$1.5 million in a CRA QIF and

donations totaling \$52,000 to organizations that had a CD purpose. ONB didn't have any prior period investments.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Louisville-Jefferson County, KY-IN MA #31140 and Owensboro, KY MA #36980 is not inconsistent with the bank's overall "High Satisfactory" performance under the investment test in Kentucky. Refer to the Table 14 in the state of Kentucky section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Kentucky is rated "Outstanding". Based on full-scope reviews, the bank's performance in the Non MA KY Counties is excellent.

Retail Banking Services

Refer to Table 15 in the state of Kentucky section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

ONB's service delivery systems are readily accessible to geographies and individuals of different income levels throughout the AA. The percentage of branches in the one moderate-income geography substantially exceeds the percentage of the population residing in this geography. There are no low-income geographies. There were no branch closings or openings in this AA.

ONB's hours and services offered throughout the AA are good. Office hours and services do not vary in a way that inconveniences its AA, particularly in the one moderate-income geography. Banking hours and services are provided Monday through Friday and are supplemented by Saturday hours at three of the seven branches in this AA. The four branches that don't have Saturday hours are located in middle-income geographies. There were no material differences in the services offered at the various branch locations.

ONB uses ATMs and online banking as alternative delivery systems for providing retail banking services to low- and moderate-income individuals and in the one moderate-income geography. ONB has seven full service and no cash dispense only ATMs located in this AA. The percentage of ATMs in the one moderate-income geography substantially exceeds the percentage of the population residing in this geography. As previously stated, ONB's online banking isn't an effective means of providing retail banking services to low- and moderate-income individuals.

Community Development Services

ONB has provided an adequate level of CD services in this AA. Although ONB's CD services have generally not been innovative, they have met some of the identified community needs. CD services were related to promoting economic development, affordable housing to low- and moderate-income individuals, and community services primarily to low- and moderate-income individuals. Approximately 15 organizations have benefited from ONB's participation in providing CD services. Examples of CD services are detailed below.

- An ONB employee assisted in preparing financial reports for a not-profit organization that provides affordable housing to low- and moderate-income families.
- An ONB employee assisted in the establishment of a student bank at a public school whose pupils are primarily from low- and moderate-income families. The ONB employee taught students how a bank operates, conducted mock interviews for bank positions to teach them job interviewing skills, and discussed the budget and financial plans for the upcoming school year. The student bank is part of the school curriculum that teaches students about money and banking.
- ONB employees have participated in fund raising activities for several organizations that provide grant money to various CD entities that provide various community services primarily to low- and moderate-income individuals.
- A total of 27 ONB employees, from 2005 through 2008, have provided CD services to an organization that provides mentoring and outreach programs to youths predominantly from single parent low- and moderate-income households. CD services included providing financial education and exposing the youth to banking, conducting financial audits, assisting with financial planning, and assisting with fund raising activities.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in Owensboro, KY MA #36980 is not inconsistent with the overall "excellent" performance under the service test in Kentucky. In the Louisville-Jefferson County, KY-IN MA #31140 the bank's performance is weaker than the bank's overall performance in the state. Refer to Table 15 in the state of Kentucky section of appendix D for the facts and data that support these conclusions.

The weaker performance in the Louisville-Jefferson County KY-IN MA # 31140 is attributed to the fact ONB doesn't have any branches in the one moderate-income geography in which 6 percent of the population resides. This weaker performance lowered the state of Kentucky rating from "Outstanding" to "High Satisfactory".

State Rating

State of Ohio

CRA Rating for Ohio⁵: Satisfactory

The lending test is rated: **Low Satisfactory**

The investment test is rated: **Low Satisfactory**

The service test is rated: **Low Satisfactory**

The major factors that support this rating include:

- Lending levels are good.
- The geographic distribution of loans among geographies is adequate.
- The distribution of loans among borrowers of different income levels is good.
- Investment activity reflects an adequate level of responsiveness to identified community needs.
- ONB's service delivery systems are reasonably accessible to geographies and individuals of different income levels. The bank provides an adequate level of CD services.

Description of Institution's Operations in Ohio

The state of Ohio represents 1 percent (\$56 million) of ONB's total deposits. During the evaluation period, ONB originated and purchased .4 percent, 1 percent, and 4 percent of total home mortgage loans, small loans to businesses, and small loans to farms, respectively, within the state of Ohio. ONB has one AA in Ohio and is the 193rd largest bank in the state in relation to deposits. ONB has one branch office and one ATM located in the eastern portion of Darke County in Union City. The AA is mostly rural. ONB's primary competition includes Greenville National Bank, Second National Bank, and Greenville Federal. The one AA in the state of Ohio is Darke County.

Refer to the market profile for the state of Ohio in appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

⁵ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state 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.

Scope of Evaluation in Ohio

The one AA of Darke County is receiving a full-scope review. We determined the community's needs by contacting representatives from a social service agency and an economic development agency. See the Market Profile in appendix C for further information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Ohio is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in Darke County is adequate.

Lending Activity

Refer to Table 1 Lending Volume in the state of Ohio section of appendix D for the facts and data used to evaluate the bank's lending activity.

ONB's lending activity is good in Darke County. During this evaluation period, 20 percent, 40 percent, and 40 percent of the loans originated and purchased in this AA were home mortgage loans, small loans to businesses, and small loans to farms, respectively. Among home mortgage loans, 14 percent, 47 percent, and 39 percent, were home purchase, home improvement, and home mortgage refinance, respectively. Multifamily loans represented less than 1 percent of total loans in this AA.

ONB's lending activity is good given its deposit market share considering the large number of lending competitors operating in the area. ONB ranks fifth in terms of deposits among depository institutions, with a 6 percent market share. According to 2007 aggregate HMDA data, ONB is the second largest and twenty-second largest originator and purchaser of home improvement and home mortgage refinance loans with an 11 percent and 1 percent market share, respectively. In 2007, the bank didn't originate and purchase any home purchase loans. Consequently, ONB showed a market share of 0 percent. ONB's lending levels are excellent for home improvement loans. While ONB's market share of home purchase and refinance loans is lower than its deposit market share, we considered the performance adequate given the large number of mortgage lenders originating loans within the AA, many of which do not have a deposit taking facility within the AA. ONB ranks ninth and second among all lenders for small loans to businesses and small loans to farms, respectively based on 2007 Aggregate CRA data with a 3 percent and 17 percent market share, respectively. ONB's lending levels are adequate and excellent for small loans to businesses and small loans to farms, respectively. While ONB's market share of small loans to businesses is lower than its deposit market share, we considered their performance adequate, given eight of the top ten lenders, excluding ONB, do not have a deposit taking facility within the AA.

Distribution of Loans by Income Level of the Geography

The geographic distribution of ONB's small loans to businesses in Darke County is adequate. There are no low-income geographies in this AA. The number of multifamily loans and home purchase loans in this AA are not significant enough to perform a meaningful analysis. Additionally, the number of farms located in the one moderate-income geography is not significant enough to perform a meaningful analysis. Dunn and Bradstreet data indicates there are only 11 farms located in the moderate-income geography.

In evaluating the bank's performance, we took into consideration the one moderate-income geography is located in Greenville, Ohio which is 12 miles away from ONB's closest branch in Union City, Ohio. Additionally, there are seven financial institutions located in Greenville, Ohio which limits ONB's opportunity to make loans in this moderate-income geography.

In the AA, we placed the most weight on the distribution of small loans to businesses, then home improvement loans, and then home mortgage refinance loans because they represented the largest percentage of loans originated and purchased within the AA.

Home Mortgage Loans

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

Home Improvement Loans

The geographic distribution of home improvement loans is adequate. ONB didn't originate or purchase any home improvement loans in the one moderate-income geography. However, we considered the performance adequate given the performance context noted above.

Home Mortgage Refinance Loans

The geographic distribution of home mortgage refinance loans is adequate. ONB didn't originate or purchase any home improvement loans in the one moderate-income geography. However, we considered the performance adequate given the performance context noted above.

Small Loans to Businesses

Refer to Table 6 in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The geographic distribution of small loans to businesses is adequate. The portion of small loans to businesses located in the one moderate-income geography is significantly lower than the portion of businesses within the geography. In 2007, the bank didn't originate and

purchase any small loans to businesses in the one moderate-income geography. Consequently, ONB had a market share of 0 percent for this geography. However, we considered the performance adequate given the performance context noted above.

Lending Gap Analysis

We reviewed summary reports detailing ONB's lending activity over the evaluation period for home mortgage loans, small loans to businesses, and small loans to farms to identify gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in lending.

Inside/Outside Ratio

The inside/outside ratio analysis was conducted at the bank level. Refer to Evansville-Henderson, IN-KY MA #21780.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of home mortgage loans and small loans to businesses reflects good dispersion among borrowers of different income levels in Darke County. The number of home purchase loans in this AA are not significant enough to perform a meaningful analysis.

In December 2006, ONB management made a business decision to underwrite small loans to businesses and small loans to farms without revenue information. A majority of the small loans to farm loans did not have revenue information. Consequently, a meaningful analysis couldn't be performed. In evaluating the bank's performance of small loans to businesses, we took into consideration that 39 percent of these loans in this AA did not have revenue information.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Improvement Loans

ONB does an excellent job of addressing the low- and moderate-income borrower credit needs for home improvement loans. The portion of home improvement loans to low-income borrowers and moderate-income borrowers exceeded the portion of AA families who are low-income and moderate-income, respectively. The bank's market share of loans to low-income borrowers exceeded the bank's overall market share. In 2007, the bank didn't originate or purchase any home improvement loans to moderate-income borrowers; consequently, ONB showed a market share of 0 percent for moderate-income borrowers.

Home Mortgage Refinance Loans

ONB does an excellent job of address the low- and moderate-income borrower credit needs for home mortgage refinance loans. The portion of home mortgage refinance loans to low-income borrowers and moderate-income borrowers exceeded the portion of AA families who are low-income and moderate-income, respectively. The bank's market share of loans to low-income borrowers and moderate-income borrowers was lower than the bank's overall market share, respectively.

Small Loans to Businesses

The borrower distribution of small loans to businesses is good. The portion of loans extended to businesses with revenues of \$1 million or less was somewhat lower than the portion of area businesses that have revenue levels of \$1 million or less. The bank's market share to the \$1 million or less borrowers was significantly lower than the bank's overall market share.

Refer to Table 11 in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Small Loans to Farms

Refer to Table 12 in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

Community Development Lending

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

ONB did not originate any CD loans in this AA.

Product Innovation and Flexibility

ONB didn't present any innovative or flexible loan products for our consideration.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Ohio is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in Darke County is adequate.

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

In drawing our conclusions relative to this AA, we considered the complexity of the activity, the bank's capacity, degree of competition, credit and community credit needs of the AA, and available opportunities for investment. As described in the Market Profiles section in appendix C, we determined the opportunity to make qualified investments other than donations is extremely limited in this AA.

ONB donated \$7,000 during the evaluation period to five organizations that had a CD purpose. Given the extremely limited opportunity to make qualified investments other than donations in this AA, the bank's performance is adequate.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Ohio is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in Darke County is adequate.

Retail Banking Services

Refer to Table 15 in the state of Ohio section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

ONB's delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the AA. There are no low-income and one moderate-income geography in this AA. ONB doesn't have any branches in the one moderate-income geography. However, only 8 percent of the AA's population resides in this geography. There were no branch closings or openings in this AA.

ONB use ATMs and online banking as alternative delivery systems for providing retail banking services to low- and moderate-income individuals and the one moderate-income geography. ONB has one full service ATM which is located in a middle-income geography. As previously stated, ONB's online banking isn't an effective means of providing retail banking services to low- and moderate-income individuals.

Community Development Services

ONB's has provided an adequate level of CD services in this AA. Although ONB's CD services have generally not been innovative, they have met some of the identified community needs. ONB's CD services were related to affordable housing for low- and moderate-income individuals, promoting economic development, and community services to low- and moderate-income individuals. Four organizations have benefited from ONB's participation in providing CD services. Examples of CD services include:

- ONB employees assisted a non-profit community development corporation in preparing a Federal Home Loan Bank AHP application with the \$300,000 in proceeds used to help purchase and rehab a historical school building into 31 rental units for low- and moderate-income seniors. Services available to the seniors include food service and transportation. This housing complex received an award at the annual Indiana Statewide Housing Conference. Although this complex is located in Union City, Indiana, it directly benefited seniors residing in Union City, Ohio due the two cities extremely close proximity to each other.
- An ONB employee provided financial literacy workshops to first time low- and moderate-income home buyers.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD loans): 01/02/05 to 06/30/08 CD Loans, Investment Test and Service Test: 03/15/05 to 06/30/08	
Financial Institution	Products Reviewed	
Old National Bank (ONB) Evansville, Indiana	Home mortgage loans, small loans to businesses, and small loans to farms, and CD loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
ONB Foundation	Refer to comment under affiliate (s)	Qualified Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Evansville-Henderson, IN-KY MA #21780 (Only Posey, Vanderburgh, Warrick, & Gibson Counties, IN and Henderson County, KY)	Full-Scope	
State of Illinois Non MA IL Counties (Clark, Jackson, Jefferson, Lawrence, Saline, Wabash, White, & Williamson Counties) Danville, IL MA #19180	Full-Scope Limited-Scope	
State of Indiana Non MA IN Counties (Daviess, Dubois, Fountain, Jay, Knox, Grant, Martin, Orange, Parke, Perry, Randolph, Spencer, Warren, & Wayne Counties) Indianapolis-Carmel, IN MA #26900 (Only Boone, Hamilton, Johnson, Marion, & Putnam Counties)	Full-Scope Full-Scope	

Terre Haute, IN MA #45460 (Only Vermillion & Vigo Counties)	Full-Scope	
Anderson, IN MA #11300	Limited-Scope	
Bloomington, IN MA #14020 (Only Monroe County)	Limited-Scope	
Elkhart-Goshen, IN MA #21140	Limited-Scope	
Lafayette, IN MA #29140 (Only Tippecanoe County)	Limited-Scope	
Muncie, IN MA #34620	Limited-Scope	
South Bend-Mishawaka, IN MA #43780	Limited-Scope	
State of Kentucky		
Non MA KY Counties (Hopkins, Muhlenberg, & Union Counties)	Full-Scope	
Louisville-Jefferson County, KY-IN MA #31140 (Only Jefferson County, KY)	Limited-Scope	
Owensboro, KY MA #36980 (Only Daviess County)	Limited-Scope	
State of Ohio		
Darke County	Full-Scope	

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS		OLD NATIONAL BANK		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Old National Bank	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Evansville-Henderson IN-KY MA # 21780	Outstanding	High Satisfactory	Outstanding	Outstanding
State of Illinois	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
State of Indiana	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Kentucky	Low Satisfactory	High Satisfactory	Outstanding	Satisfactory
State of Ohio	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

Evansville-Henderson, IN-KY MA #21780

Demographic Information for Full-Scope Area: Evansville-Henderson, IN-KY MA #21780						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	81	3.70	28.40	46.91	20.99	0.00
Population by Geography	328,695	2.35	22.11	50.97	24.57	0.00
Owner-Occupied Housing by Geography	93,914	1.54	17.18	54.40	26.88	0.00
Businesses by Geography	22,704	2.09	28.00	49.74	20.17	0.00
Farms by Geography	1,135	0.26	10.13	58.41	31.19	0.00
Family Distribution by Income Level	89,299	18.59	18.24	24.12	39.04	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	32,893	3.93	31.80	51.09	13.18	0.00
Median Family Income						
HUD Adjusted Median Family Income for 2008	= \$48,255					
Households Below the Poverty Level	= \$59,800					
	= 10%					
			Median Housing Value			=
			Unemployment Rate (August 2008)			\$83,484
						= 5.5%

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 U.S. Census, and 2008 HUD updated MFI.

ONB's AA consists of five (Gibson, Posey, Vanderburgh, and Warrick Counties, Indiana, and Henderson County, Kentucky) of the six counties that comprise the Evansville-Henderson, IN-KY MA, #21780 which is located in southeast Indiana and northwest Kentucky. ONB's AA excludes Webster County, Kentucky because it doesn't have any branches in this county. This MA is the seventh largest MA in the states of Indiana and Kentucky. ONB has 18 branch offices, 27 full service ATMs, and 12 cash dispense only ATMs located within the AA. Over the evaluation period, 29 percent of home mortgage loans, 24 percent of small loans to businesses, and 7 percent of small loans to farms were derived from this AA. The bank's primary business focus in the AA is traditional retail banking products.

ONB's deposits in this AA total \$1.6 billion. This represents 29 percent of the bank's total deposits. ONB is the largest deposit-taking institution in the AA with a 29 percent market share, based on FDIC deposit market share data as of June 30, 2008. Major competitors include Fifth Third Bank, Integra Bank, N.A., and Bank of Evansville.

Evansville's economy has lost ground in 2008. Real personal income has declined, and total employment is falling. The unemployment rate has risen, although not as rapidly as the national rate. Very few industries are solid. Healthcare and education have modest gains while leisure and hospitality, finance, and professional services are holding their ground. Construction is beginning to fade as housing starts are at one third of their level from a year

ago. Manufacturing continues a long term decline. Major industries consist of manufacturing, followed by education and health services, retail trade, and government. Major employers include Toyota Motor Corporation, Deaconess Hospital, St. Mary's Medical Center, Koch-Enterprises Inc., Industrial Contractors, Alcoa, and Whirlpool Corporation. 6

In the AA, non-agricultural wage and salaried employment rose minimally from 165,413 in January 2000 to 167,389 in August 2008, an increase of 1 percent. During this same time period, the unemployment rate increased from 3.6 percent to 5.5 percent. The state of Indiana and state of Kentucky unemployment rates were 5.8 percent and 6.7 percent, respectively, as of August 2008. Gibson County and Warrick County, Indiana, had the highest and lowest unemployment rates in the AA of 6.3 percent and 4.9 percent, respectively. Seven percent of families live below the poverty level in the AA based on 2000 Census Data. It is especially difficult for this segment of the population to afford and maintain a home.

The 2008 HUD adjusted median family income for the AA is \$59,800. Nineteen percent and 18 percent of families are low- and moderate-income, respectively, based on 2000 Census Data. The 2000 median housing value for the AA is \$83,484.

In 2008, the National Low Income Housing Coalition (NLIHC) estimated that between 40 percent and 41 percent of renters in the AA paid more than 30 percent of their income for housing costs. This compares to 46 percent and 47 percent for the states of Indiana and Kentucky, respectively. An individual would either need to earn between 183 percent and 198 percent of the federal minimum wage (based on a 40-hour work week) or work a 73- to 79-hour work week to afford the fair market rent between \$558 and \$602.

Included in this AA is an Indiana designated Enterprise Zone located in Evansville, Indiana. Many programs exist through tax benefits and incentives and loan and grant programs to facilitate investment in the zone, improve the quality of housing, and implement CD projects that support quality jobs and strong neighborhoods.

We determined the community's needs by contacting representatives from one housing organization and three social services organizations. We also reviewed the HUD Consolidated Housing and CD Plan for the city of Evansville. HUD Consolidated Housing and CD Plans are comprehensive planning documents that identify community needs.

We identified the following credit and non-credit related needs in this AA:

- Housing for the homeless and individuals with HIV and AIDs.
- Affordable rental units for the very low income renters, including HUD Section 8 subsidized housing. According to the 2000 Census, there are 9,737 very low income renter households in the City of Evansville that comprise 46 percent of all renter households. And 70.9 percent and 51.5 percent of all very low income households are spending over 30 percent and 50 percent of their income, respectively, on housing costs. The waiting list for HUD Section 8 housing is at two years, and there are over 1,700 individuals on the list compared to 1,900 available vouchers.
- Affordable mortgage loans targeted to low- and moderate-income individuals.

6 Moody's Economy.com, June 2008

- Micro enterprise assistance consisting of technical training and small dollar venture capital loans.
- Social services to low- and moderate-income families including child care, health and dental care, affordable in-home care for the elderly, employment and job training, nutrition, and financial literacy services.

We determined the opportunities to make CD loans and provide CD services within the AA are abundant. The AA has numerous CD organizations including non-profit housing and social service agencies that provide community services to low- and moderate-income individuals. Additionally, there are numerous agencies that are involved in economic and business development. The opportunity to make qualified investments other than donations does exist but is limited. These opportunities include low-income housing tax credits, mortgage-backed securities for affordable housing, and CRA QIF. Although there is a community development financial institution (CDFI), a CDC, and a community development housing corporation (CDHO) in this AA, we determined these organizations lack the capacity that would enable a financial institution to make an equity investment in these organizations. Competition for CD loans, qualified investments, and CD services is moderate to high and consists primarily of local financial institutions that have a presence within the AA.

State of Illinois

Non MA IL Counties (Clark, Jackson, Jefferson, Lawrence, Saline, Wabash, White, and Williamson)

Demographic Information for Full-Scope Area: Non MA IL Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	67	2.99	29.85	61.19	5.97	0.0
Population by Geography	248,454	1.52	28.54	63.59	6.35	0.0
Owner-Occupied Housing by Geography	70,692	0.21	22.56	70.30	6.93	0.0
Businesses by Geography	18,761	2.07	37.89	53.62	6.42	0.0
Farms by Geography	1,309	0.08	12.07	83.80	4.05	0.0
Family Distribution by Income Level	65,040	22.44	19.76	23.80	34.00	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	27,446	0.83	32.27	63.14	3.76	0.0
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below the Poverty Level	= \$43,531 = \$51,900 = 17%	Median Housing Value Unemployment Rate (August 2008)		= \$57,139 = 8.1%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2008 HUD updated MFI.

ONB’s AA consists of eight non-MA counties (Clark, Jackson, Jefferson, Lawrence, Saline, Wabash, White, and Williamson Counties) located in southeastern Illinois. The AA’s population represents 2 percent of the state’s total population. ONB has 12 branch offices, 15 full service ATMs, and six cash dispense only ATMs located within the AA. Over the evaluation period, 9 percent of home mortgage loans, 8 percent of small loans to businesses, and 10 percent of small loans to farms were derived from this AA. The bank’s primary business focus in the AA is traditional retail banking products.

ONB’s deposits in this AA total \$552 million. This represents 10 percent of the bank’s total deposits. ONB is the largest deposit taking institution in the AA with a 13 percent market share, based on FDIC deposit market share data as of June 30, 2008. Major competitors include Banterra Bank, Midcountry Bank, and Peoples Bank, N.A.

Major industries in the AA consist of services, followed by retail trade, and construction. In the AA, non-agricultural wage and salaried employment increased from 113,769 in January 2000 to 123,517 in August 2008, an increase of 9 percent. During this same time period, the unemployment rate increased from 6.2 percent to 8.1 percent. The state of Illinois’ unemployment rate was 6.5 percent as of August 2008. Lawrence and White Counties had the highest and lowest unemployment rates in the AA of 10.1 percent and 7.2 percent,

respectively. Eleven percent of families live below the poverty level in the AA, based on 2000 Census Data. It is especially difficult for this segment of the population to afford and maintain a home.

The 2008 HUD adjusted statewide non-MA median family income for the AA is \$51,900. Twenty-two percent and 20 percent of families are low- and moderate-income, respectively, based on 2000 Census Data. The 2000 median housing value for the AA is \$57,139.

In 2008, the NLIHC estimated that between 41 percent and 48 percent of renters in the AA paid more than 30 percent of their income for housing costs. This compares to 51 percent for the state of Illinois. An individual would either need to earn between 135 percent and 142 percent of the federal minimum wage (based on a 40-hour work week) or work a 54- to 57-hour work week to afford the fair market rent between \$528 and \$552.

We determined the community's needs by contacting a representative from an economic development agency, two affordable housing agencies, and three social service agencies.

We identified the following credit and non-credit related needs in this AA:

- Emergency housing funds for rental assistance and delinquent mortgage payments.
- Emergency shelters for the homeless.
- Grants for rehabilitation of homes.
- Down payment assistance funds and affordable mortgage loans for first time home buyers.
- Affordable housing rental units.
- Homebuyer counseling.
- Micro business loans under \$5,000 for entities that don't qualify for a traditional bank loan.
- Commercial loans for research and development activities.
- Increased public transportation.

We determined the opportunities to make CD loans and provide CD services within the AA are moderate. The AA has housing and social service agencies that provide community services to low- and moderate-income individuals. Additionally, there are agencies that are involved in economic and business development. However, the opportunity to make qualified investments other than donations is limited and consists of low-income housing tax credits, mortgage-backed securities for affordable housing for a larger statewide or regional area, low-income credit unions, CRA QIF, and a CDC. Competition for CD loans, qualified investments, and CD services is moderate to high and consists primarily of local financial institutions that have a presence within the AA.

State of Indiana

Non MA IN Counties (Daviness, Dubois, Fountain, Jay, Knox, Grant, Martin, Orange, Parke, Perry, Randolph, Spencer, Warren, and Wayne Counties)

Demographic Information for Full-Scope Area: Non MA IN Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	102	0.98	16.67	76.47	5.88	0.0
Population by Geography	415,036	1.09	15.12	76.10	7.69	0.0
Owner-Occupied Housing by Geography	120,743	0.48	13.33	78.01	8.17	0.0
Businesses by Geography	26,538	2.36	16.22	71.42	10.00	0.0
Farms by Geography	2,965	0.07	3.74	88.36	7.82	0.0
Family Distribution by Income Level	113,066	18.71	20.52	25.08	35.69	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	44,356	1.71	20.01	73.52	4.75	0.0
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below the Poverty Level	= \$45,666 = \$53,200 = 11%	Median Housing Value Unemployment Rate (August 2008)		= \$73.437 = 6.2%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2008 HUD updated MFI.

ONB’s AA consists of fourteen non-MA counties (Daviness, Dubois, Fountain, Jay, Knox, Grant, Martin, Orange, Parke, Perry, Randolph, Spencer, Warren, and Wayne Counties) located in the southern two-thirds of the state of Indiana. The AA’s population represents 7 percent of the state’s total population. ONB has 31 branch offices, 28 full service ATMs, and eight cash dispense only ATMs located within the AA. Over the evaluation period, 19 percent of home mortgage loans, 21 percent of small loans to businesses, and 61 percent of small loans to farms were derived from this AA. The bank’s primary business focus in the AA is traditional retail banking products.

ONB’s deposits in this AA total \$1.3 billion. This represents 23 percent of the bank’s total deposits. ONB is the fifth largest deposit taking institution in the AA with a 6 percent market share, based on FDIC deposit market share data as of June 30, 2008. Major competitors include JP Morgan Chase Bank, N.A., National City Bank, and Fifth Third Bank.

Major industries in the AA consist of services, followed by retail trade, and agriculture. In the AA, non-agricultural wage and salaried employment declined from 199,382 in January 2000 to 195,936 in August 2008, a decline of 2 percent. During this same time period, the unemployment rate increased from 4.0 percent to 6.2 percent. The state of Indiana’s unemployment rate was 5.8 percent as of August 2008. Wayne and Dubois Counties had the

highest and lowest unemployment rates in the AA of 7.3 percent and 4.0 percent, respectively. Eight percent of families live below the poverty level in the AA, based on 2000 Census Data. It is especially difficult for this segment of the population to afford and maintain a home.

The 2008 HUD adjusted statewide non-MA median family income for the AA is \$53,200. Nineteen percent and 21 percent of families are low- and moderate-income, respectively, based on 2000 Census Data. The 2000 median housing value for the AA is \$73, 437.

In 2008, the NLIHC estimated that between 37 percent and 49 percent of renters in the AA paid more than 30 percent of their income for housing costs. This compares to 46 percent for the state of Indiana. An individual would either need to earn between 182 percent and 199 percent of the federal minimum wage (based on a 40-hour work week) or work a 73- to 80-hour work week to afford the fair market rent between \$555 and \$605.

We determined the community's needs by contacting representatives from two economic development corporations, one social service agency, and four housing and social service agencies.

We identified the following credit and non-credit related needs in this AA:

- Grants to operate emergency shelters.
- Affordable rehabilitation financing.
- Revolving loan funds targeted to manufacturing and high tech businesses.
- Various community services targeted to low- and moderate-income individuals such as Meals on Wheels and financial literacy to allow independent living.
- Various community services for senior citizens such as tax preparation assistance, transportation, financial counseling, and funding for emergency assistance grants.

We determined the opportunities to make CD loans and provide CD services within the AA are moderate. The AA has housing and social service agencies that provide community services to low- and moderate-income individuals. Additionally, there are agencies that are involved in economic and business development. However, the opportunity to make qualified investments other than donations is limited and consists of low-income housing tax credits, mortgage-backed securities for affordable housing for a larger statewide or regional area, low-income credit unions, and CRA QIF. Competition for CD loans, qualified investments, and CD services is moderate to high and consists primarily of local financial institutions that have a presence within the AA.

State of Indiana

Indianapolis-Carmel MA #26900

Demographic Information for Full-Scope Area: Indianapolis-Carmel MA #26900						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	269	9.67	30.48	39.03	20.45	0.37
Population by Geography	1,240,529	5.69	26.31	40.09	27.91	0.0
Owner-Occupied Housing by Geography	317,899	3.58	21.61	41.61	33.21	0.0
Businesses by Geography	105,164	4.49	19.38	42.53	33.48	0.12
Farms by Geography	2,506	1.80	14.25	55.11	28.85	0.0
Family Distribution by Income Level	319,671	20.17	18.67	22.56	38.61	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	124,141	9.95	39.87	37.55	12.63	0.0
Median Family Income						
HUD Adjusted Median Family Income for 2008	= \$55,425					=
Households Below the Poverty Level	= \$65,100					\$110,79
	= 9%					6
						=5.6 %

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 U.S. Census, and 2008 HUD updated MFI.

ONB’s AA consists of five (Boone, Hamilton, Johnson, Marion, and Putnam Counties) of the ten counties that comprise the Indianapolis-Carmel, IN MA #26900, which is located in central Indiana. ONB’s AA excludes Brown, Hancock, Hendricks, Morgan, and Shelby Counties because it doesn’t have any branches in these counties. This MA is the largest MA in the state of Indiana. ONB has 12 branch offices, 12 full service ATMs, and one cash dispense only ATM located within the AA. Over the evaluation period, 7 percent of home mortgage loans, 12 percent of small loans to businesses, and 2 percent of small loans to farms were derived from this AA. The bank’s primary business focus in the AA is traditional retail banking products.

ONB’s deposits in this AA total \$411 million. This represents 7 percent of the bank’s total deposits. ONB is the tenth largest deposit-taking institution in the AA with a 2 percent market share, based on FDIC deposit market share data as of June 30, 2008. Major competitors include JP Morgan Chase Bank, N.A., National City Bank, and Fifth Third Bank.

The Indianapolis economy continues to expand and is out performing the state and nation. Payroll growth has moderated in many of the metro’s top industries with the exception of retail trade, which has added jobs in recent months, indicating that consumer demand remains healthy. Manufacturing, construction, and financial activities are all seeing job losses. House prices continue to increase, although building activity has slowed dramatically from a year ago as housing inventories remain elevated. The jobless rate has moved higher since the end of 2007, but it remains far below the state and national rates. Major industries consist of professional and business services, followed by government, education and health services,

and manufacturing. Major employers include Clarian Health Partners, Inc., Wal-Mart Corporation, Community Health Network, Eli Lilly and Company, and St. Vincent Hospitals and Health Services.⁷

In the AA, non-agricultural wage and salaried employment rose from 637,031 in January 2000 to 694,769 in August 2008, an increase of 9 percent. During this same time period, the unemployment rate increased from 2.9 percent to 5.6 percent. The state of Indiana unemployment rate was 5.8 percent, as of August 2008. Putnam County and Hamilton County had the highest and lowest unemployment rates in the AA of 6.9 percent and 4.2 percent, respectively. Seven percent of families live below the poverty level in the AA based on 2000 Census Data. It is especially difficult for this segment of the population to afford and maintain a home.

The 2008 HUD adjusted median family income for the AA is \$65,100. Twenty percent and 19 percent of families are low- and moderate-income, respectively, based on 2000 Census Data. The 2000 median housing value for the AA is \$110,796.

In 2008, the NLIHC estimated that between 45 percent and 47 percent of renters in the AA paid more than 30 percent of their income for housing costs. This compares to 46 percent for the state of Indiana. An individual would either need to earn between 209 percent and 239 percent of the federal minimum wage (based on a 40-hour work week) or work an 83 to 95 hour work week to afford the fair market rent between \$635 and \$726.

Included in this AA is an Indiana designated Enterprise Zone located in Indianapolis, Indiana. Many programs exist through tax benefits and incentives and loan and grant programs to facilitate investment in the zone, improve the quality of housing, and implement CD projects that support quality jobs and strong neighborhoods.

We determined the community's needs by reviewing other CRA public evaluations and contacting representatives from a housing organization, three economic development corporations, and a local office of a national non-profit organization that supports CD organizations. We also reviewed the HUD Consolidated Housing and CD Plan for the city of Indianapolis. HUD Consolidated Housing and CD Plans are comprehensive planning documents that identify community needs.

We identified the following credit and non-credit related needs in this AA:

- Affordable rental units for the very low income renters. Only 13 percent of available rental housing units are affordable to families whose income is 30 percent or less of the median family income.
- Affordable owner occupied housing for families earning less than 80 percent of the median family income. Although estimates indicated the Indianapolis MA has an excess of 88,000 housing units, these units are routinely purchased by individuals in higher income brackets.
- Affordable mortgage loans to low- and moderate-income individuals.
- Down payment assistance and home ownership counseling for first time home buyers.
- Temporary housing for the homeless and permanent housing for individuals with HIV and AIDs.

⁷ Moody's Economy.com – June 2008

- Community services to low- and moderate-income families, including child care, health and dental care, affordable in-home care for the elderly, employment and job training, nutrition, and financial literacy services.
- Loans to CD organizations including lines of credit to non profit organizations to acquire single family homes for redevelopment.
- Small business loans including leasehold improvement and working capital financing.

We determined the opportunities to make CD loans and provide CD services within the AA are abundant. The AA has numerous CD organizations including CDFI's, CDC's, CHDO's, and many other non-profit housing and social service agencies that provide community services to low- and moderate-income individuals. Additionally, there are numerous agencies that are involved in economic and business development. There are ample opportunities to make qualified investments in the AA other than low-income housing tax credits, mortgage-backed securities for affordable housing, CRA QIF, and donations. Competition for CD loans, qualified investments, and CD services is moderate to high and consists primarily of local financial institutions that have a presence within the AA.

State of Indiana

Terre Haute MA #45460

Demographic Information for Full-Scope Area: Terre Haute MA #45460						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	35	0.0	31.43	42.86	22.86	2.86
Population by Geography	122,636	0.0	25.09	43.24	29.21	2.46
Owner-Occupied Housing by Geography	32,997	0.0	19.51	48.95	31.54	0.0
Businesses by Geography	7,671	0.0	23.35	49.63	25.77	1.25
Farms by Geography	345	0.0	6.67	53.62	39.71	0.0
Family Distribution by Income Level	30,989	19.50	18.38	22.19	39.92	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	11,739	0.0	35.81	44.13	20.06	0.0
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below the Poverty Level	= \$42,192 = \$48,300 = 14%	Median Housing Value Unemployment Rate (August 2008)				= \$69,937 = 7.1%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2008 HUD updated MFI.

ONB’s AA consists of two (Vermillion and Vigo Counties) of the four counties that comprise the Terre Haute, IN MA #45460, which is located in western Indiana. ONB’s AA excludes Clay and Sullivan Counties because it doesn’t have any branches in these counties. This MA is the twelfth largest MA in the state of Indiana. ONB has six branch offices, six full service ATMs, and 10 cash dispense only ATMs located within the AA. Over the evaluation period, 8 percent of home mortgage loans, 6 percent of small loans to businesses, and 2 percent of small loans to farms were derived from this AA. The bank’s primary business focus in the AA is traditional retail banking products.

ONB’s deposits in this AA total \$365 million. This represents 7 percent of the bank’s total deposits. ONB is the second largest deposit-taking institution in the AA with a 21 percent market share, based on FDIC deposit market share data as of June 30, 2008. Major competitors include First Financial Bank, N.A., Terre Haute Savings Bank, and Fifth Third Bank.

Terre Haute’s expansion ended as the credit crunch began in 2007, and the economy remained in recession well into the second quarter of 2008. Surveys indicate that employment contractions are accelerating. Manufacturing and construction are the hardest hit in the downturn, but service industries fare little better. Few industries are adding jobs, and trade is noticeably downsizing. Residential building intentions are tracking at the lowest annualized pace on record, and industrial output is in free fall. Major industries consist of government followed by education and health services, manufacturing, and retail trade. Major employers

include Union Hospital Health Care Group, Indiana State University, Sony DADC, Bemis Company Film Division, and Terre Haute Regional Hospital.⁸

In the AA, non-agricultural wage and salaried employment declined from 56,728 in January 2000 to 53,251 in August 2008, a decrease of 6 percent. During this same time period, the unemployment rate increased from 4.5 percent to 7.1 percent. The state of Indiana's unemployment rate was 5.8 percent as of August 2008. Ten percent of families live below the poverty level in the AA based on 2000 Census Data. It is especially difficult for this segment of the population to afford and maintain a home.

The 2008 HUD adjusted median family income for the AA is \$48,300. Nineteen percent and 18 percent of families are low- and moderate-income, respectively, based on 2000 Census Data. The 2000 median housing value for the AA is \$69,937.

In 2008, the NLIHC estimated that 48 percent of renters in the AA paid more than 30 percent of their income for housing costs. This compares to 46 percent for the state of Indiana. An individual would either need to earn 191 percent of the federal minimum wage (based on a 40-hour work week) or work a 76-hour work week to afford the fair market rent of \$580.

Included in this AA is an Indiana designated Enterprise Zone located in Terre Haute, Indiana. Many programs exist through tax benefits and incentives and loan and grant programs to facilitate investment in the zone, improve the quality of housing, and implement CD projects that support quality jobs and strong neighborhoods.

We determined the community's needs by contacting representatives from a non profit housing organization and two economic development corporations. We also reviewed the HUD Consolidated Housing and CD Plan for the city of Terre Haute. HUD Consolidated Housing and CD Plans are comprehensive planning documents that identify community needs.

We identified the following credit and non-credit related needs in this AA:

- Affordable and decent rental housing. Approximately 60 percent of the very low income households have some sort of housing problem such as living in substandard housing, living in overcrowded conditions, or paying more than 30 percent of their household income for housing costs. A community contact indicated that although the average rent is only \$450 per month, it is difficult for a family of four earning minimum wage to afford rent. Furthermore, affordable rental housing is also impacted since many of the vacant rental units are in substandard condition.
- Affordable homes and mortgages for low- and moderate-income families.
- Assistance with rehabilitating owner and renter occupied homes. Data from the 2000 Census indicates that 65 percent of the housing stock is at least 40 years old. Many people living in the older homes are lower income or elderly residents on fixed income resulting in their inability to perform routine maintenance.
- Additional public housing units since the waiting list totals 775 individuals.
- HUD Section 8 subsidized rental housing. As of December 31, 2006, all certificates and vouchers were being used.
- Emergency shelter for the homeless.

⁸ Moody's Economy.com, June 2008

- Venture capital business loans.

We determined the opportunities to make CD loans and provide CD services within the AA are moderate. The AA has housing and social service agencies that provide community services to low- and moderate-income individuals. Additionally, there are agencies that are involved in economic and business development. However, the opportunity to make qualified investments other than donations is limited and consists of low-income housing tax credits, mortgage-backed securities for affordable housing for a larger statewide or regional area, a low-income credit union, and CRA QIF. Competition for CD loans, qualified investments, and CD services is moderate to high and consists primarily of local financial institutions that have a presence within the AA.

State of Kentucky

Non MA KY Counties (Hopkins, Muhlenberg, and Union Counties)

Demographic Information for Full-Scope Area: Non MA KY Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	24	0.0	4.17	58.33	37.50	0.0
Population by Geography	93,995	0.0	3.52	51.94	44.54	0.0
Owner-Occupied Housing by Geography	28,759	0.0	2.74	53.89	43.37	0.0
Businesses by Geography	8,415	0.0	5.86	48.28	45.86	0.0
Farms by Geography	381	0.0	1.31	36.75	61.94	0.0
Family Distribution by Income Level	26,632	18.39	14.93	20.49	46.18	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	8,875	0.0	5.28	63.01	31.71	0.0
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below the Poverty Level	= \$32,884 = \$41,000 = 17%	Median Housing Value Unemployment Rate (August 2008)				= \$53,612 = 7.7%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2008 HUD updated MFI.

ONB’s AA consists of three non-MA counties (Hopkins, Muhlenberg, and Union Counties) located in western Kentucky. The AA’s population represents 2 percent of the state’s total population. ONB has seven branch offices, seven full service ATMs, and no cash dispense ATMs located within the AA. Over the evaluation period, 11 percent of home mortgage loans, 6 percent of small loans to businesses, and 7 percent of small loans to farms were derived from this AA. The bank’s primary business focus in the AA is traditional retail banking products.

ONB’s deposits in this AA total \$366 million. This represents 7 percent of the bank’s total deposits. ONB is the largest deposit taking institution in the AA with a 30 percent market share, based on FDIC deposit market share data as of June 30, 2008. Major competitors include Fifth Third Bank, First United Bank & Trust Company, and Integra Bank, N.A.

Major industries in the AA consist of services, followed by retail trade and construction. In the AA, non-agricultural wage and salaried employment increased from 39,151 in January 2000 to 40,727 in August 2008, an increase of 4 percent. During this same time period, the unemployment rate increased from 6.2 percent to 7.7 percent. The state of Kentucky’s unemployment rate was 6.7 percent as of August 2008. Muhlenberg and Union Counties had the highest and lowest unemployment rates in the AA of 9.2 percent and 6.2 percent, respectively. Fourteen percent of families live below the poverty level in the AA, based on

2000 Census Data. It is especially difficult for this segment of the population to afford and maintain a home.

The 2008 HUD adjusted statewide non-MA median family income for the AA is \$41,000. Eighteen percent and 15 percent of families are low- and moderate-income, respectively, based on 2000 Census Data. The 2000 median housing value for the AA is \$53,612.

In 2008, the NLIHC estimated that between 43 percent and 47 percent of renters in the AA paid more than 30 percent of their income for housing costs. This compares to 47 percent for the state of Kentucky. An individual would either need to earn 161 percent of the federal minimum wage (based on a 40-hour work week) or work a 64-hour work week to afford the fair market rent of \$490.

We determined the community's needs by contacting representatives from a community based development corporation and a social service agency.

We identified the following credit and non-credit related needs in this AA:

- Affordable housing and first time home buyer programs.
- Business loans under \$50,000.
- Utility assistance for low- and moderate-income individuals.
- Financial literacy classes.

We determined the opportunities to make CD loans and provide CD services within the AA are moderate. The AA has housing and social service agencies that provide community services to low- and moderate-income individuals. Additionally, there are agencies that are involved in economic and business development. However, the opportunity to make qualified investments other than donations is extremely limited and consists of mortgage-backed securities for affordable housing for a larger statewide or regional area and CRA QIF. Competition for CD loans, qualified investments, and CD services is moderate to high and consists primarily of local financial institutions that have a presence within the AA.

State of Ohio

Darke County

Demographic Information for Full-Scope Area: Darke County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	12	0.0	8.33	75.00	16.67	0.0
Population by Geography	53,309	0.0	7.94	73.36	18.70	0.0
Owner-Occupied Housing by Geography	15,640	0.0	6.82	74.18	19.01	0.0
Businesses by Geography	3,657	0.0	13.10	68.36	18.54	0.0
Farms by Geography	627	0.0	1.75	79.74	18.50	0.0
Family Distribution by Income Level	14,982	15.39	17.88	25.57	41.16	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	4,984	0.0	11.74	73.35	14.91	0.0
Median Family Income						
HUD Adjusted Median Family Income for 2008	= \$43,801					
Households Below the Poverty Level	= \$51,600					
	= 8%					
			Median Housing Value			=
			Unemployment Rate (August 2008)			\$92,506
						= 6.1%

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 U.S. Census, and 2008 HUD updated MFI.

ONB’s AA consists of Darke County located in western Ohio. The AA’s population represents .5 percent of the state’s total population. ONB has one branch office, one full service ATM, and no cash dispense only ATMs located within the AA. The one branch is located in Union City, Ohio, a small farming community located in the eastern part of the county adjacent to Union City, Indiana. The one moderate-income geography is located in Greenville, Ohio approximately 12 miles from Union City, Ohio. Seven financial institutions have branch offices in Greenville, Ohio. Over the evaluation period, .4 percent of home mortgage loans, 1 percent of small loans to businesses, and 4 percent of small loans to farms were derived from this AA. The bank’s primary business focus in the AA is traditional retail banking products.

ONB’s deposits in this AA total \$56 million. This represents 1 percent of the bank’s total deposits. ONB is the fifth largest deposit taking institution in the AA with a 6 percent market share, based on FDIC deposit market share data as of June 30, 2008. Major competitors include Greenville National Bank, Second National Bank, and Greenville Federal.

Darke County is primarily rural with land mainly used for crop or pasture. Greenville, the largest city in the county, is located in the center of the county. Major industries in the AA consist of services, followed by agriculture, and retail trade. Major employers include Brethren’s Home, Florida Production Engineering, Honeywell CPG, Midmark Corporation, and Greenville Technology, Inc.

In the AA, non-agricultural wage and salaried employment increased from 26,136 in January 2000 to 27,442 in August 2008, an increase of 5 percent. During this same time period, the unemployment rate increased from 5.2 percent to 6.1 percent. The state of Ohio's unemployment rate was 6.9 percent as of August 2008. Six percent of families live below the poverty level in the AA, based on 2000 Census Data. It is especially difficult for this segment of the population to afford and maintain a home.

The 2008 HUD adjusted statewide non-MA median family income for the AA is \$51,600. Fifteen percent and 18 percent of families are low- and moderate-income, respectively, based on 2000 Census Data. The 2000 median housing value for the AA is \$92,506.

In 2008, the NLIHC estimated 41 percent of renters in the AA paid more than 30 percent of their income for housing costs. This compares to 46 percent for the state of Ohio. An individual would either need to earn 152 percent of the federal minimum wage (based on a 40-hour work week) or work a 61-hour work week to afford the fair market rent of \$555.

We determined the community's needs by contacting representatives from a social service agency and an economic development agency.

We identified the following credit and non-credit related needs in this AA:

- Financial literacy.
- Affordable micro business loans.
- Affordable owner occupied housing.

We determined the opportunities to make CD loans and provide CD services within the AA are moderate. The AA has housing and social service agencies that provide community services to low- and moderate-income individuals. Additionally, there are agencies that are involved in economic and business development. However, the opportunity to make qualified investments other than donations is extremely limited and consists of mortgage-backed securities for affordable housing for a larger statewide or regional area and CRA QIF. Competition for CD loans, qualified investments, and CD services is moderate to high and consists primarily of local financial institutions that have a presence within the AA.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

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

bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

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

table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

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

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

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

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

Table 1. Lending Volume

LENDING VOLUME		Geography: IL-IN-KY-OH				Evaluation Period: JANUARY 1, 2005 TO JUNE 30, 2008						
MA/Assessment Area (2008):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Multistate MA:												
Evansville-Henderson, IN-KY MA #21780 (FS)	100.00	5,077	442,397	3,227	393,019	260	22,519	17	41,000	8,581	898,935	100.00
State of Illinois:												
Non MA IL Counties (FS)	78.53	1,635	94,341	1,081	90,208	369	24,357	10	2,946	3,095	211,852	75.93
Danville, IL MA #19180 (LS)	21.47	301	16,057	418	54,759	125	11,920	2	1,200	846	83,936	24.07
State of Indiana:												
Non MA IN Counties (FS)	48.82	3,366	208,103	2,774	240,710	2,249	177,786	14	21,692	8,403	648,291	47.78
Indianapolis-Carmel, IN MA #26900 (FS)	16.99	1,278	143,309	1,558	297,275	68	5,756	20	58,856	2,924	505,196	15.36
Terre Haute, IN MA #45460 (FS)	12.89	1,374	94,005	765	100,058	77	9,398	2	4,700	2,218	208,161	13.65
Anderson IN MA #11300 (LS)	2.55	277	16,200	149	14,198	7	275	6	3,712	439	34,385	2.13
Bloomington, IN MA #14020 (LS)	6.76	572	73,759	580	81,555	7	993	5	4,972	1,164	161,279	5.46
Elkhart-Goshen, IN MA #21140 (LS)	0.77	19	2,892	113	22,636	1	178	0	0	133	25,706	1.12
Lafayette, IN MA #29140 (LS)	1.25	52	4,753	143	20,215	20	2,255	1	2,840	216	30,063	0.52
Muncie, IN MA #34620 (LS)	8.60	798	61,737	618	88,530	56	3,350	8	6,419	1,480	155,097	7.25
South Bend-Mishawaka, IN MA #43780 (LS)	1.37	50	14,035	185	37,933	0	0	0	0	235	51,968	6.73

* Loan Data as of June 30, 2008. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from March 15, 2005 to June 30, 2008.

*** Deposit Data as of June 30, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

State of Kentucky:												
Non MA KY Counties (FS)	60.56	1,948	92,566	862	77,685	246	17,097	0	0	3,056	187,348	73.20
Louisville-Jefferson County, KY-IN MA #31140 (LS)	14.33	334	49,496	384	90,775	3	120	2	10,486	723	141,114	12.20
Owensboro, KY MA #36980 (LS)	25.11	646	53,663	584	57,143	37	4,133	0	0	1,267	114,939	14.60
State of Ohio:												
Darke County	100.00	78	3,297	161	6,706	159	12,063	0	0	398	22,066	100.00

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: IL-IN-KY-OH					Evaluation Period: JANUARY 1, 2005 TO JUNE 30, 2008				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Multistate MA:																								
Evansville-Henderson, IN-KY MA #21780 (FS)	2,013	100.00	1.54	0.55	17.18	14.16	54.40	45.65	26.88	39.64	7.69	6.25	7.66	6.97	8.71									
State of Illinois:																								
Non MA IL Counties (FS)	505	81.72	0.21	0.99	22.56	26.73	70.30	58.42	6.93	13.86	4.73	0.00	5.98	4.19	6.03									
Danville, IL MA #19180 (LS)	113	18.28	0.00	0.00	8.14	7.96	69.82	51.33	22.04	40.71	2.21	0.00	1.45	2.04	2.81									
State of Indiana:																								
Non MA IN Counties (FS)	1,045	39.04	0.48	0.19	13.33	12.73	78.01	73.97	8.17	13.11	4.93	0.00	6.07	4.92	3.67									
Indianapolis-Carmel, IN MA #26900 (FS)	446	16.66	3.58	0.90	21.61	9.87	41.61	46.86	33.21	42.38	0.29	0.11	0.27	0.34	0.26									
Terre Haute, IN MA #45460 (FS)	487	18.19	0.00	0.00	19.51	14.99	48.95	48.25	31.54	36.76	6.90	0.00	3.77	7.99	7.31									
Anderson, IN MA #11300 (LS)	89	3.33	2.46	0.00	13.30	10.11	52.79	55.06	31.45	34.83	1.56	0.00	2.82	1.45	1.46									
Bloomington, IN MA #14020 (LS)	225	8.40	0.77	0.89	8.38	13.33	54.51	46.67	36.34	39.11	1.43	0.00	1.49	1.60	1.25									
Elkhart-Goshen, IN MA #21140 (LS)	3	0.11	0.06	0.00	2.92	0.00	90.58	66.67	6.44	33.33	0.09	0.00	0.00	0.07	0.44									
Lafayette, IN MA #29140 (LS)	22	0.82	0.25	0.00	9.47	4.55	54.56	59.09	35.72	36.36	0.33	0.00	0.00	0.60	0.13									
Muncie, IN MA #34620 (LS)	330	12.33	0.11	0.30	26.38	14.85	34.99	33.03	38.52	51.82	4.37	0.00	4.92	3.83	4.52									
South Bend-Mishawaka, IN MA #43780 (LS)	30	1.12	1.29	0.00	19.73	6.67	51.29	20.00	27.68	73.33	0.44	0.00	0.19	0.11	1.12									

* Based on 2007 Peer Mortgage Data (Eastern & Western)

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

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

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

State of Kentucky:															
Non MA KY Counties (FS)	474	47.88	0.00	0.00	2.74	3.80	53.89	39.45	43.37	56.75	14.94	0.00	14.29	15.06	14.87
Louisville-Jefferson County, KY-IN MA #31140 (LS)	218	22.02	2.63	0.92	18.63	18.81	41.62	29.36	37.11	50.92	0.14	0.00	0.15	0.09	0.19
Owensboro KY MA # 36980 (LS)	298	30.10	0.00	0.00	12.09	6.38	62.07	64.09	25.84	29.53	3.26	0.00	0.64	4.26	2.75
State of Ohio:															
Darke County	11	100.00	0.00	0.00	6.82	0.00	74.18	100.00	19.01	0.00	0.00	0.00	0.00	0.00	0.00

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: IL-IN-KY-OH		Evaluation Period: JANUARY 1, 2005 TO JUNE 30, 2008				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Multistate MA:																					
Evansville-Henderson, IN-KY MA #21780 (FS)	1,083	100.00	1.54	1.29	17.18	21.79	54.40	51.43	26.88	25.48	28.43	35.00	28.43	29.11	26.95						
State of Illinois:																					
Non MA IL Counties (FS)	513	84.24	0.21	0.97	22.56	25.73	70.30	67.06	6.93	6.24	31.73	100.00	27.42	32.71	32.43						
Danville, IL MA #19180 (LS)	96	15.76	0.00	0.00	8.14	3.13	69.82	66.67	22.04	30.21	7.65	0.00	7.14	4.93	14.44						
State of Indiana:																					
Non MA IN Counties (FS)	1,052	47.24	0.48	0.38	13.33	12.93	78.01	82.03	8.17	4.66	27.24	10.00	19.31	28.66	26.47						
Indianapolis-Carmel, IN MA #26900 (FS)	447	20.07	3.58	3.58	21.61	24.61	41.61	48.10	33.21	23.71	1.64	0.00	1.32	1.98	1.61						
Terre Haute, IN MA #45460 (FS)	354	15.90	0.00	0.00	19.51	16.95	48.95	54.24	31.54	28.81	26.85	0.00	21.13	29.61	25.58						
Anderson, IN MA #11300 (LS)	90	4.04	2.46	1.11	13.30	10.00	52.79	46.67	31.45	42.22	3.47	0.00	1.96	2.91	5.13						
Bloomington, IN MA #14020 (LS)	88	3.95	0.77	6.82	8.38	6.82	54.51	48.86	36.34	37.50	8.19	25.00	0.00	6.63	11.58						
Elkhart-Goshen, IN MA #21140 (LS)	3	0.13	0.06	0.00	2.92	0.00	90.58	100.00	6.44	0.00	0.34	0.00	0.00	0.37	0.00						
Lafayette, IN MA #29140 (LS)	10	0.45	0.25	0.00	9.47	0.00	54.56	40.00	35.72	60.00	0.65	0.00	0.00	0.55	0.89						
Muncie, IN MA #34620 (LS)	179	8.04	0.11	0.00	26.38	28.49	34.99	34.64	38.52	36.87	15.48	0.00	18.67	14.78	14.17						
South Bend-Mishawaka, IN MA #43780 (LS)	4	0.18	1.29	0.00	19.73	0.00	51.29	25.00	27.68	75.00	0.51	0.00	0.00	0.23	1.54						

* Based on 2007 Peer Mortgage Data (Eastern & Western)

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

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

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

State of Kentucky:															
Non MA KY Counties (FS)	680	83.13	0.00	0.00	2.74	2.94	53.89	59.12	43.37	37.94	55.74	0.00	60.00	68.24	43.96
Louisville-Jefferson County, KY-IN MA # 31140 (LS)	22	2.69	2.63	4.55	18.63	0.00	41.62	22.73	37.11	72.73	0.47	0.00	0.00	0.25	1.11
Owensboro, KY MA #36980 (LS)	116	14.18	0.00	0.00	12.09	9.48	62.07	63.79	25.84	26.72	11.54	0.00	3.13	14.44	8.11
State of Ohio:															
Darke County	37	100.00	0.00	0.00	6.82	0.00	74.18	100.00	19.01	0.00	11.49	0.00	0.00	16.39	0.00

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: IL-IN-KY-OH				Evaluation Period: JANUARY 1, 2005 TO JUNE 30, 2008				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Multistate MA:																				
Evansville-Henderson, IN-KY MA #21780 (FS)	1,967	100.00	1.54	1.22	17.18	15.76	54.40	49.31	26.88	33.71	9.85	13.89	9.12	9.66	10.40					
State of Illinois:																				
Non MA IL Counties (FS)	603	86.89	0.21	0.17	22.56	24.21	70.30	64.18	6.93	11.44	6.35	0.00	6.80	5.91	9.39					
Danville, IL MA #19180 (LS)	91	13.11	0.00	0.00	8.14	5.49	69.82	64.84	22.04	29.67	2.15	0.00	0.00	1.80	3.83					
State of Indiana:																				
Non MA IN Counties (FS)	1,260	44.12	0.48	0.56	13.33	8.73	78.01	80.63	8.17	10.08	5.05	6.38	3.06	5.34	4.95					
Indianapolis-Carmel, IN MA #26900 (FS)	379	13.27	3.58	0.79	21.61	13.98	41.61	48.02	33.21	37.20	0.33	0.12	0.20	0.36	0.36					
Terre Haute, IN MA #45460 (FS)	530	18.56	0.00	0.00	19.51	10.75	48.95	59.43	31.54	29.81	9.50	0.00	4.97	12.23	8.10					
Anderson, IN MA #11300 (LS)	98	3.43	2.46	4.08	13.30	10.20	52.79	47.96	31.45	37.76	0.96	0.00	0.00	0.90	1.42					
Bloomington, IN MA #14020 (LS)	254	8.89	0.77	1.97	8.38	8.27	54.51	46.06	36.34	43.70	1.79	6.90	1.78	0.84	3.04					
Elkhart-Goshen, IN MA #21140 (LS)	13	0.46	0.06	0.00	2.92	0.00	90.58	84.62	6.44	15.38	0.18	0.00	0.00	0.17	0.43					
Lafayette, IN MA #29140 (LS)	20	0.70	0.25	0.00	9.47	20.00	54.56	25.00	35.72	55.00	0.48	0.00	2.16	0.16	0.57					
Muncie, IN MA #34620 (LS)	286	10.01	0.11	0.00	26.38	20.98	34.99	35.31	38.52	43.71	2.84	0.00	2.35	2.69	3.21					
South Bend-Mishawaka, IN MA #43780 (LS)	16	0.56	1.29	0.00	19.73	6.25	51.29	18.75	27.68	75.00	0.12	0.00	0.15	0.10	0.16					

* Based on 2007 Peer Mortgage Data (Eastern & Western)

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

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

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

State of Kentucky:															
Non MA KY Counties (FS)	790	70.98	0.00	0.00	2.74	1.39	53.89	52.41	43.37	46.20	19.76	0.00	25.00	22.81	17.34
Louisville-Jefferson County, KY-IN MA #31140 (LS)	91	8.18	2.63	1.10	18.63	12.09	41.62	30.77	37.11	56.04	0.19	0.00	0.12	0.12	0.30
Owensboro, KY MA #36980 (LS)	232	20.84	0.00	0.00	12.09	6.03	62.07	66.38	25.84	27.59	4.46	0.00	3.29	5.23	3.16
State of Ohio:															
Darke County	30	100.00	0.00	0.00	6.82	0.00	74.18	100.00	19.01	0.00	0.99	0.00	0.00	1.30	0.00

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															Geography: IL-IN-KY-OH		Evaluation Period: JANUARY 1, 2005 TO JUNE 30, 2008				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Multistate MA:																					
Evansville-Henderson, IN-KY MA #21780 (FS)	14	100.00	2.56	0.00	42.13	28.57	45.57	71.43	9.74	0.00	5.88	0.00	6.67	7.69	0.00						
State of Illinois:																					
Non MA IL Counties (FS)	14	93.33	17.65	42.86	50.98	21.43	23.74	35.71	7.63	0.00	14.29	0.00	0.00	3.33	0.00						
Danville, IL MA #19180 (LS)	1	6.67	0.00	0.00	30.15	0.00	42.26	100.00	27.59	0.00	0.00	0.00	0.00	0.00	0.00						
State of Indiana:																					
Non MA IN Counties (FS)	9	34.62	5.12	0.00	24.01	66.67	55.79	33.33	15.09	0.00	9.68	0.00	25.00	5.26	0.00						
Indianapolis-Carmel, IN MA #26900 (FS)	6	23.07	7.16	0.00	32.96	33.33	45.36	66.67	14.52	0.00	0.00	0.00	0.00	0.00	0.00						
Terre Haute, IN MA #45460 (FS)	3	11.54	0.00	0.00	41.87	33.33	28.79	33.33	29.34	33.33	0.00	0.00	0.00	0.00	0.00						
Anderson, IN MA #11300 (LS)	0	0.00	1.95	0.00	13.44	0.00	76.21	0.00	8.40	0.00	0.00	0.00	0.00	0.00	0.00						
Bloomington, IN MA #14020 (LS)	5	19.23	25.20	20.00	18.67	20.00	33.44	40.00	22.69	20.00	5.88	16.67	0.00	0.00	0.00						
Elkhart-Goshen, IN MA #21140 (LS)	0	0.00	2.97	0.00	7.24	0.00	85.35	0.00	4.44	0.00	0.00	0.00	0.00	0.00	0.00						
Lafayette, IN MA #29140 (LS)	0	0.00	28.12	0.00	23.97	0.00	20.11	0.00	27.79	0.00	0.00	0.00	0.00								
Muncie, IN MA #34620 (LS)	3	11.54	9.02	0.00	26.64	33.33	33.28	66.67	31.06	0.00	16.67	0.00	0.00	25.00	0.00						
South Bend-Mishawaka, IN MA #43780 (LS)	0	0.00	2.28	0.00	30.66	0.00	42.25	0.00	24.82	0.00	0.00	0.00	0.00	0.00	0.00						

* Based on 2007 Peer Mortgage Data (Eastern & Western)

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

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

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

State of Kentucky:															
Non MA KY Counties (FS)	4	57.14	0.00	0.00	12.62	25.00	42.25	25.00	45.13	50.00	0.00	0.00	0.00	0.00	0.00
Louisville-Jefferson County, KY-IN MA #31140 (LS)	3	42.86	11.28	0.00	27.49	100.00	34.74	0.00	26.49	0.00	0.00	0.00	0.00	0.00	0.00
Owensboro, KY MA #36980 (LS)	0	0.00	0.00	0.00	24.69	0.00	69.29	0.00	6.02	0.00	0.00	0.00	0.00	0.00	0.00
State of Ohio:															
Darke County	0	0.00	0.00	0.00	5.85	0.00	82.95	0.00	11.20	0.00	0.00	0.00	0.00	0.00	0.00

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: IL-IN-KY-OH		Evaluation Period: JANUARY 1, 2005 TO JUNE 30, 2008				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businessess***	% BANK Loans	% of Businessess***	% BANK Loans	% of Businessess***	% BANK Loans	% of Businessess***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Multistate MA:																					
Evansville-Henderson, IN-KY MA #21780 (FS)	3,227	100.00	2.09	1.12	28.00	25.84	49.74	43.54	20.17	29.50	10.07	10.31	10.84	9.91	10.71						
State of Illinois:																					
Non MA IL Counties (FS)	1,081	72.11	2.07	0.74	37.89	29.79	53.62	56.15	6.42	13.32	3.82	2.11	3.45	4.16	5.61						
Danville, IL MA #19180 (LS)	418	27.89	0.00	0.00	19.70	32.06	62.84	46.41	17.46	21.53	5.22	0.00	13.49	3.55	5.43						
State of Indiana:																					
Non MA IN Counties (FS)	2,774	40.29	2.36	0.97	16.22	13.30	71.42	74.77	10.00	10.96	6.82	5.12	4.37	7.97	6.43						
Indianapolis-Carmel, IN MA #26900 (FS)	1,558	22.63	4.49	3.92	19.38	14.96	42.53	41.01	33.48	40.12	0.91	1.24	0.81	0.91	0.96						
Terre Haute, IN MA #45460 (FS)	765	11.11	0.00	0.00	23.35	23.65	49.63	49.01	25.77	27.33	6.23	0.00	8.10	5.89	5.85						
Anderson, IN MA #11300 (LS)	149	2.16	2.24	6.71	18.28	14.77	54.56	44.30	24.92	34.23	1.61	9.30	1.94	1.40	1.50						
Bloomington, IN MA #14020 (LS)	580	8.42	15.93	13.79	13.28	10.34	44.00	42.07	26.79	33.79	3.05	2.65	1.87	3.52	3.34						
Elkhart-Goshen, IN MA #21140 (LS)	113	1.64	4.03	9.73	5.36	6.19	86.08	76.11	4.53	7.96	1.45	5.26	2.30	1.29	2.22						
Lafayette, IN MA #29140 (LS)	143	2.08	5.44	0.00	30.28	37.76	36.24	23.08	27.82	39.16	1.15	0.00	2.38	0.65	1.35						
Muncie, IN MA #34620 (LS)	618	8.98	1.59	0.97	33.73	25.40	31.33	33.98	33.35	39.64	5.15	0.00	5.45	5.05	5.54						
South Bend-Mishawaka, IN MA #43780 (LS)	185	2.69	2.03	1.08	28.23	22.16	46.22	52.43	23.52	24.32	1.53	0.00	1.92	1.52	1.46						

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2008).

State of Kentucky:															
Non MA KY Counties (FS)	862	47.11	0.00	0.00	5.86	2.78	48.28	51.97	45.86	45.24	11.28	0.00	6.32	13.18	10.66
Louisville-Jefferson County KY-IN MA #31140 (LS)	384	20.98	5.14	10.94	23.17	18.23	30.84	16.93	40.85	53.91	0.39	1.62	0.32	0.16	0.47
Owensboro, KY MA #36980 (LS)	584	31.91	0.00	0.00	23.71	19.86	55.53	51.20	20.76	28.94	5.78	0.00	4.84	6.02	6.47
State of Ohio:															
Darke County	161	100.00	0.00	0.00	13.10	1.24	68.36	96.27	18.54	2.48	2.64	0.00	0.00	4.03	0.27

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: IL-IN-KY-OH															
Evaluation Period: JANUARY 1, 2005 TO JUNE 30, 2008															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Multistate MA:															
Evansville-Henderson, IN-KY MA #21780 (FS)	260	100.00	0.26	0.00	10.13	9.23	58.41	58.46	31.19	32.31	35.26	0.00	62.50	30.65	44.44
State of Illinois:															
Non MA IL Counties (FS)	369	74.70	0.08	0.00	12.07	10.30	83.80	84.01	4.05	5.69	23.93	0.00	21.05	24.35	50.00
Danville, IL MA #19180 (LS)	125	25.30	0.00	0.00	1.28	3.20	88.91	75.20	9.81	21.60	19.64	0.00	100.00	18.11	24.32
State of Indiana:															
Non MA IN Counties (FS)	2,249	90.50	0.07	0.00	3.74	1.07	88.36	93.69	7.82	5.25	46.27	0.00	20.00	46.42	73.33
Indianapolis-Carmel, IN MA #26900 (FS)	68	2.74	1.80	0.00	14.25	30.88	55.11	58.82	28.85	10.29	4.15	0.00	10.71	3.25	3.45
Terre Haute, IN MA #45460 (FS)	77	3.10	0.00	0.00	6.67	1.30	53.62	77.92	39.71	20.78	15.12	0.00	50.00	18.52	8.06
Anderson, IN MA #11300 (LS)	7	0.28	0.21	0.00	4.22	0.00	51.90	57.14	43.67	42.86	3.77	0.00	0.00	3.03	5.26
Bloomington, IN MA #14020 (LS)	7	0.28	2.25	0.00	5.86	28.57	58.56	71.43	33.33	0.00	16.67	0.00	0.00	23.08	0.00
Elkhart-Goshen, IN MA #21140 (LS)	1	0.04	0.69	0.00	0.69	0.00	96.53	100.00	2.08	0.00	0.00	0.00	0.00	0.00	0.00
Lafayette, IN MA #29140 (LS)	20	0.81	0.00	0.00	6.36	0.00	61.59	65.00	32.05	35.00	7.87	0.00	0.00	5.00	16.67
Muncie, IN MA #34620 (LS)	56	2.25	0.00	0.00	11.32	0.00	57.86	80.36	30.82	19.64	21.43	0.00	0.00	35.14	7.41
South Bend-Mishawaka, IN MA #43780 (LS)	0	0.00	0.20	0.00	7.54	0.00	72.10	0.00	20.16	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2008).

State of Kentucky:															
Non MA KY Counties (FS)	246	86.01	0.00	0.00	1.31	0.00	36.75	47.15	61.94	52.85	43.26	0.00	0.00	60.71	32.14
Louisville-Jefferson County, KY-IN MA #31140 (LS)	3	1.05	2.67	0.00	16.62	0.00	37.69	0.00	43.03	100.00	0.00	0.00	0.00	0.00	0.00
Owensboro, KY MA # 36980 (LS)	37	12.94	0.00	0.00	4.16	0.00	76.18	89.19	19.67	10.81	13.95	0.00	0.00	16.00	0.00
State of Ohio:															
Darke County	159	100.00	0.00	0.00	1.75	0.00	79.74	100.00	18.50	0.00	17.02	0.00	0.00	21.28	0.00

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: IL-IN-KY-OH					Evaluation Period: JANUARY 1, 2005 TO JUNE 30, 2008				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families*****	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Multistate MA:																								
Evansville-Henderson, IN-KY MA #21780(FS)	2,013	100.00	18.59	12.60	18.24	23.35	24.12	24.30	39.04	39.76	7.85	7.82	7.77	6.53	8.90									
State of Illinois:																								
Non MA IL Counties (FS)	505	81.72	22.44	13.57	19.76	23.38	23.80	28.39	34.00	34.66	5.09	7.57	5.53	4.12	4.85									
Danville, IL MA #19180 (LS)	113	18.28	18.09	7.34	18.78	29.36	23.64	22.02	39.49	41.28	2.29	0.00	4.55	0.86	2.35									
State of Indiana:																								
Non MA IN Counties (FS)	1,045	39.04	18.71	13.62	20.52	28.33	25.08	29.12	35.69	28.92	5.42	4.32	4.95	6.94	5.12									
Indianapolis-Carmel, IN MA #26900 (FS)	446	16.66	20.17	11.22	18.67	22.44	22.56	24.19	38.61	42.14	0.30	0.27	0.33	0.28	0.31									
Terre Haute, IN MA #45460 (FS)	487	18.19	19.50	9.05	18.38	16.94	22.19	26.91	39.92	47.10	7.20	5.74	6.58	7.18	7.95									
Anderson, IN MA #11300 (LS)	89	3.33	18.05	11.49	19.37	25.29	23.21	25.29	39.38	37.93	1.71	1.61	1.74	1.13	2.26									
Bloomington, IN MA #14020 (LS)	225	8.40	17.40	10.28	16.89	17.29	21.13	17.29	44.58	55.14	1.65	4.19	2.11	1.34	1.26									
Elkhart-Goshen, IN MA #21140 (LS)	3	0.11	16.23	33.33	19.39	0.00	27.07	33.33	37.31	33.33	0.10	0.27	0.00	0.13	0.11									
Lafayette, IN MA #29140 (LS)	22	0.82	18.42	10.53	18.69	31.58	23.75	15.79	39.15	42.11	0.31	0.00	0.52	0.26	0.27									
Muncie, IN MA #34620 (LS)	330	12.33	20.00	11.36	18.73	23.97	21.12	25.87	40.15	38.80	4.71	2.52	4.69	5.16	4.86									
South Bend-Mishawaka, IN MA #43780 (LS)	30	1.12	18.53	0.00	18.63	3.85	23.48	7.69	39.36	88.46	0.45	0.00	0.08	0.09	1.08									

* Based on 2007 Peer Mortgage Data (Eastern & Western)

** As a percentage of loans with borrower income information available. No information was available for 5.8% of loans originated and purchased by bank.

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

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

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

State of Kentucky:															
Non MA KY Counties (FS)	474	47.88	18.39	6.46	14.93	14.03	20.49	25.17	46.18	54.34	15.41	18.75	15.49	15.68	14.93
Louisville-Jefferson County, KY-IN MA #31140 (LS)	218	22.02	21.34	11.96	17.42	24.40	21.65	27.75	39.59	35.89	0.14	0.00	0.13	0.18	0.15
Owensboro, KY MA #36980 (LS)	298	30.10	18.70	11.19	17.31	26.22	23.07	31.47	40.92	31.12	3.44	2.14	2.52	4.75	3.51
State of Ohio:															
Darke County	11	100.00	15.39	0.00	17.88	45.45	25.57	9.09	41.16	45.45	0.00	0.00	0.00	0.00	0.00

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: IL-IN-KY-OH					Evaluation Period: JANUARY 1, 2005 TO JUNE 30, 2008					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families*****	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Multistate MA:																
Evansville-Henderson, IN-KY MA #21780(FS)	1,083	100.00	18.59	12.95	18.24	23.86	24.12	28.53	39.04	34.66	28.08	27.64	32.16	27.30	26.79	
State of Illinois:																
Non MA IL Counties (FS)	513	84.24	22.44	11.40	19.76	23.60	23.80	27.00	34.00	38.00	33.33	29.55	29.06	33.33	36.63	
Danville, IL MA #19180 (LS)	96	15.76	18.09	5.26	18.78	25.26	23.64	27.37	39.49	42.11	7.55	0.00	4.62	5.06	11.41	
State of Indiana:																
Non MA IN Counties (FS)	1,052	47.24	18.71	12.79	20.52	22.12	25.08	26.92	35.69	38.17	27.53	26.76	27.16	28.35	27.37	
Indianapolis-Carmel, IN MA #26900 (FS)	447	20.07	20.17	10.73	18.67	23.06	22.56	30.59	38.61	35.62	1.65	0.83	0.77	2.17	2.07	
Terre Haute, IN MA #45460 (FS)	354	15.90	19.50	10.62	18.38	18.29	22.19	24.78	39.92	46.31	25.89	22.22	21.62	30.77	25.74	
Anderson, IN MA #11300 (LS)	90	4.04	18.05	3.53	19.37	12.94	23.21	43.53	39.38	40.00	3.27	0.00	1.10	5.13	5.17	
Bloomington, IN MA #14020 (LS)	88	3.95	17.40	11.90	16.89	19.05	21.13	26.19	44.58	42.86	8.28	0.00	4.35	5.41	11.69	
Elkhart-Goshen, IN MA #21140 (LS)	3	0.13	16.23	0.00	19.39	0.00	27.07	66.67	37.31	33.33	0.35	0.00	0.00	0.53	0.46	
Lafayette, IN MA # 29140 (LS)	10	0.45	18.42	0.00	18.69	33.33	23.75	22.22	39.15	44.44	0.66	0.00	0.00	0.00	1.56	

* Based on 2007 Peer Mortgage Data (Eastern & Western)

** As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchased by bank.

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

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

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

Muncie, IN MA #34620 (LS)	179	8.04	20.00	14.20	18.73	22.16	21.12	22.16	40.15	41.48	15.84	15.91	11.11	16.18	17.52
South Bend-Mishawaka, IN MA #43780 (LS)	4	0.18	18.53	0.00	18.63	0.00	23.48	0.00	39.36	100.00	0.40	0.00	0.00	0.00	1.10
State of Kentucky:															
Non MA KY Counties (FS)	680	83.13	18.39	5.64	14.93	15.88	20.49	23.74	46.18	54.75	55.81	26.32	59.32	54.67	58.00
Louisville-Jefferson County, KY-IN MA #31140 (LS)	22	2.69	21.34	0.00	17.42	0.00	21.65	13.64	39.59	86.36	0.48	0.00	0.00	0.00	1.18
Owensboro, KY MA #36980 (LS)	116	14.18	18.70	2.73	17.31	15.45	23.07	26.36	40.92	55.45	11.36	0.00	7.27	11.76	15.97
State of Ohio:															
Darke County	37	100.00	15.39	16.22	17.88	21.62	25.57	27.03	41.16	35.14	11.63	25.00	0.00	6.25	17.50

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: IL-IN-KY-OH					Evaluation Period: JANUARY 1, 2005 TO JUNE 30, 2008				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
Multistate MA:																								
Evansville-Henderson, IN-KY MA #21780 (FS)	1,967	100.00	18.59	10.77	18.24	19.87	24.12	26.66	39.04	42.70	10.29	8.67	8.09	9.45	12.65									
State of Illinois:																								
Non MA IL Counties (FS)	603	86.89	22.44	6.86	19.76	14.41	23.80	26.24	34.00	52.49	7.02	3.89	5.00	6.36	8.97									
Danville, IL MA #19180 (LS)	91	13.11	18.09	4.55	18.78	19.32	23.64	25.00	39.49	51.14	2.23	1.39	0.58	2.52	2.90									
State of Indiana:																								
Non MA IN Counties (FS)	1,260	44.12	18.71	11.77	20.52	20.00	25.08	26.09	35.69	42.14	5.47	4.74	4.34	4.40	7.33									
Indianapolis-Carmel, IN MA #26900 (FS)	379	13.27	20.17	8.28	18.67	18.64	22.56	21.60	38.61	51.48	0.33	0.19	0.21	0.27	0.45									
Terre Haute, IN MA #45460 (FS)	530	18.56	19.50	7.18	18.38	18.06	22.19	20.58	39.92	54.17	10.46	6.92	10.15	6.25	13.65									
Anderson, IN MA #11300 (LS)	98	3.43	18.05	7.37	19.37	26.32	23.21	30.53	39.38	35.79	1.10	0.00	1.03	1.30	1.36									
Bloomington, IN MA #14020 (LS)	254	8.89	17.40	5.96	16.89	17.87	21.13	22.13	44.58	54.04	1.93	0.91	1.08	1.23	2.78									
Elkhart-Goshen, IN MA #21140 (LS)	13	0.46	16.23	0.00	19.39	0.00	27.07	18.18	37.31	81.82	0.20	0.00	0.00	0.23	0.37									
Lafayette, IN MA # 29140 (LS)	20	0.70	18.42	0.00	18.69	15.79	23.75	15.79	39.15	68.42	0.50	0.00	0.72	0.38	0.57									

* Based on 2007 Peer Mortgage Data (Eastern & Western)

** As a percentage of loans with borrower income information available. No information was available for 4.6% of loans originated and purchased by bank.

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

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

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

Muncie, IN MA #34620 (LS)	286	10.01	20.00	6.62	18.73	19.49	21.12	23.90	40.15	50.00	3.10	0.83	3.75	3.45	3.04
South Bend-Mishawaka, IN MA #43780 (LS)	16	0.56	18.53	0.00	18.63	0.00	23.48	23.08	39.36	76.92	0.14	0.00	0.00	0.23	0.22
State of Kentucky:															
Non MA KY Counties (FS)	790	70.98	18.39	3.11	14.93	13.23	20.49	18.68	46.18	64.98	20.78	6.52	18.62	16.35	23.80
Louisville-Jefferson County, KY-IN MA #31140 (LS)	91	8.18	21.34	7.95	17.42	12.50	21.65	19.32	39.59	60.23	0.21	0.09	0.00	0.20	0.35
Owensboro, KY MA #36980 (LS)	232	20.84	18.70	4.95	17.31	15.77	23.07	28.83	40.92	50.45	4.72	1.10	4.39	4.31	5.80
State of Ohio:															
Darke County	30	100.00	15.39	17.24	17.88	27.59	25.57	17.24	41.16	37.93	0.90	2.04	1.69	0.00	0.91

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: IL-IN-KY-OH					Evaluation Period: JANUARY 1, 2005 TO JUNE 30, 2008				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Multistate MA:									
Evansville-Henderson, IN-KY MA #21780(FS)	3,227	100.00	58.17	48.34	70.03	18.25	11.71	10.07	11.40
State of Illinois:									
Non MA IL Counties (FS)	1,081	72.11	58.55	49.21	79.83	13.32	6.85	3.82	2.63
Danville, IL MA #19180 (LS)	418	27.89	59.13	42.11	66.27	20.10	13.64	5.22	3.95
State of Indiana:									
Non MA IN Counties (FS)	2,774	40.29	59.94	48.59	80.03	12.33	7.64	6.82	5.27
Indianapolis-Carmel, IN MA #26900 (FS)	1,558	22.63	63.13	45.25	55.84	21.69	22.46	0.91	1.22
Terre Haute, IN MA #45460 (FS)	765	11.11	61.49	51.90	67.06	20.00	12.94	6.23	7.98
Anderson, IN MA #11300 (LS)	149	2.16	65.52	62.42	79.87	14.09	6.04	1.61	2.00
Bloomington, IN MA #14020 (LS)	580	8.42	65.46	61.21	62.76	20.69	16.55	3.05	4.53
Elkhart-Goshen, IN MA #21140 (LS)	113	1.64	60.45	45.13	53.98	26.55	19.47	1.45	2.10
Lafayette, IN MA #29140 (LS)	143	2.08	63.23	44.06	65.03	23.78	11.19	1.15	1.15
Muncie, IN MA #34620 (LS)	618	8.98	65.09	54.21	66.50	18.61	14.89	5.15	4.83
South Bend-Mishawaka, IN MA #43780 (LS)	185	2.69	62.97	41.62	52.43	21.08	26.49	1.53	1.56

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2008).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 27.22% of small loans to businesses originated and purchased by the bank.

State of Kentucky:									
Non MA KY Counties (FS)	862	47.11	45.15	46.98	77.49	14.27	8.24	11.28	9.51
Louisville-Jefferson County, KY-IN MA #31140 (LS)	384	20.98	61.68	44.79	41.67	30.73	27.60	0.39	0.40
Owensboro, KY MA #36980 (LS)	584	31.91	54.42	48.63	77.05	14.38	8.56	5.78	5.91
State of Ohio:									
Darke County	161	100.00	55.13	50.31	91.30	8.07	0.62	2.64	1.27

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: IL-IN-KY-OH					Evaluation Period: JANUARY 1, 2005 TO JUNE 30, 2008				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Multistate MA:									
Evansville-Henderson, IN-KY MA #21780 (FS)	260	100.00	98.41	40.00	74.23	19.23	6.54	35.26	10.00
State of Illinois:									
Non MA IL Counties (FS)	369	74.70	98.62	39.30	82.66	12.74	4.61	23.93	5.09
Danville, IL MA #19180 (LS)	125	25.30	99.15	45.60	70.40	20.80	8.80	19.64	3.39
State of Indiana:									
Non MA IN Counties (FS)	2,249	90.50	98.48	37.13	78.43	16.32	5.25	46.27	8.42
Indianapolis-Carmel, IN MA #26900 (FS)	68	2.74	97.25	50.00	69.12	26.47	4.41	4.15	1.16
Terre Haute, IN MA #45460 (FS)	77	3.10	97.68	48.05	57.14	29.87	12.99	15.12	5.07
Anderson, IN MA #11300 (LS)	7	0.28	98.95	57.14	85.71	14.29	0.00	3.77	0.00
Bloomington, IN MA #14020 (LS)	7	0.28	96.85	14.29	57.14	28.57	14.29	16.67	0.00
Elkhart-Goshen, IN MA #21140 (LS)	1	0.04	98.44	0.00	0.00	100.00	0.00	0.00	0.00
Lafayette, IN MA #29140 (LS)	20	.81	97.05	20.00	40.00	60.00	0.00	7.87	0.00
Muncie, IN MA #34620 (LS)	56	2.25	97.17	32.14	89.29	8.93	1.79	21.43	2.38
South Bend-Mishawaka, IN MA #43780 (LS)	0	0.00	96.74	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2008).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 58.24% of small loans to farms originated and purchased by the bank.

State of Kentucky:									
Non MA KY Counties (FS)	246	86.01	98.43	34.55	80.49	13.82	5.69	43.26	3.03
Louisville-Jefferson County, KY-IN MA #31140 (LS)	3	1.05	97.03	66.67	100.00	0.00	0.00	0.00	0.00
Owensboro, KY MA #36980 (LS)	37	12.94	98.89	21.62	59.46	29.73	10.81	13.95	0.00
State of Ohio:									
Darke County	159	100.00	97.29	49.06	82.39	13.84	3.77	17.02	3.19

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: IL-IN-KY-OH									
Evaluation Period: MARCH 15, 2005 TO JUNE 30, 2008									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Multistate MA:									
Evansville-Henderson, IN-KY MA #21780(FS)	5	1,025	84	6,329	89	7,354	100.00	0	0
State of Illinois:									
Non MA IL Counties (FS)	2	133	51	1,505	53	1,638	84.09	0	0
Danville, IL MA #19180 (LS)	1	76	12	234	13	310	15.91	1	341
State of Indiana:									
Non MA IN Counties (FS)	1	637	62	4,618	63	5,255	43.49	0	0
Indianapolis-Carmel, IN MA #26900 (FS)	0	0	47	2,268	47	2,268	18.77	0	0
Terre Haute, IN MA #45460 (FS)	2	201	18	56	20	257	2.13		
Anderson, IN MA #11300 (LS)	0	0	13	539	13	539	4.46	0	0
Bloomington, IN MA #14020 (LS)	0	0	25	576	25	576	4.77	1	107
Elkhart-Goshen, IN MA #21140 (LS)	0	0	8	502	8	502	4.15	0	0
Lafayette, IN MA #29140 (LS)	0	0	7	1,149	7	1,149	9.51	0	0
Muncie, IN MA #34620 (LS)	0	0	15	1,024	15	1,024	8.47	1	123
South Bend-Mishawaka, IN MA #43780 (LS)	0	0	13	513	13	513	4.25	0	0

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

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

State of Kentucky:									
Non MA KY Counties (FS)	0	0	9	1,552	9	1,552	40.47	0	0
Louisville-Jefferson County, KY-IN MA #31140 (LS)	0	0	30	1,435	30	1,435	37.42	0	0
Owensboro, KY MA #36980 (LS)	0	0	14	848	14	848	22.11	0	0
State of Ohio:									
Darke County	0	0	5	7	5	7	100.00	0	0

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/ CLOSINGS								Geography: IL-IN-KY-OH		Evaluation Period: MARCH 15, 2005 TO JUNE 30, 2008							
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Multistate MA:																	
Evansville-Henderson, IN-KY MA #21780(FS)	100.00	18	100.00	5.55	38.89	38.89	16.67	0	3	0	-1	-2	0	2.35	22.11	50.97	24.57
State of Illinois:																	
Non MA IL Counties (FS)	75.93	12	80.00	8.33	33.34	50.00	8.33	0	1	0	0	-1	0	1.09	15.12	76.10	7.69
Danville, IL MA # 19180 (LS)	24.07	3	20.00	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	11.46	69.85	18.69
State of Indiana:																	
Non MA IN Counties (FS)	47.78	31	46.27	3.23	22.58	61.29	12.90	0	2	0	0	-1	-1	1.09	15.12	76.10	7.69
Indianapolis-Carmel, IN MA #26900 (FS)	15.36	12	17.91	0.00	0.00	41.67	58.33	4	0	0	0	+1	+3	5.69	26.31	40.09	27.91
Terre Haute, IN MA #45460 (FS)	13.65	6	8.95	0.00	16.67	83.33	0.00	0	0	0	0	0	0	0.00	25.09	43.24	29.21
Anderson, IN MA #11300 (LS)	2.13	3	4.48	0.00	100.00	0.00	0.00	0	1	0	0	0	-1	2.80	16.93	52.62	27.64
Bloomington, IN MA #14020 (LS)	5.46	4	5.97	25.00	50.00	0.00	25.00	0	0	0	0	0	0	14.07	15.72	43.21	27.00
Elkhart-Goshen, IN MA #21140 (LS)	1.12	1	1.49	0.00	0.00	100.00	0.00	1	0	0	0	+1	0	0.45	6.06	88.14	5.36
Lafayette, IN MA #29140 (LS)	0.52	3	4.48	0.00	66.67	0.00	33.33	3	0	0	+2	0	+1	11.66	13.40	41.74	28.61
Muncie, IN MA #34620 (LS)	7.25	6	8.96	0.00	33.33	33.33	33.33	0	1	0	0	-1	0	5.12	28.04	34.40	32.44
South Bend-Mishawaka, IN MA #43780 (LS)	6.73	1	1.49	0.00	100.00	0.00	0.00	1	0	0	0	+1	0	1.84	24.20	49.83	24.13
State of Kentucky:																	
Non MA KY Counties (FS)	73.20	7	50.00	0.00	14.29	71.42	14.29	0	0	0	0	0	0	0.00	3.52	51.94	44.54
Louisville-Jefferson County, KY-IN MA #31140 (LS)	12.20	3	21.43	0.00	33.33	0.00	66.67	2	0	0	0	0	+2	5.99	23.58	38.70	31.72

Owensboro, KY MA #36980 (LS)	14.60	4	28.57	0.00	25.00	50.00	25.00	1	1	0	0	-1	+1	0.00	16.43	60.78	22.79
State of Ohio:																	
Darke Co OH	100.00	1	0.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	7.94	73.36	18.70