



## **PUBLIC DISCLOSURE**

February 13, 2017

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

Old National Bank  
Charter Number 8846

1 Main Street  
Evansville, IN 47708

Office of the Comptroller of the Currency

Assistant Deputy Comptroller-Midsize Bank Supervision  
1 South Wacker Drive, Suite 2000  
Chicago, Illinois 60606

**NOTE:** This document is an evaluation of this bank'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 bank. This evaluation is not, and should not be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this bank.

# Table of Contents

<b>OVERALL CRA RATING</b> .....	2
<b>DEFINITIONS AND COMMON ABBREVIATIONS</b> .....	3
<b>DESCRIPTION OF INSTITUTION</b> .....	7
<b>SCOPE OF THE EVALUATION</b> .....	8
<b>FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW</b> .....	11
<b>MULTISTATE METROPOLITAN AREA RATING</b> .....	12
EVANSVILLE-HENDERSON IN-KY MMSA.....	12
LOUISVILLE-JEFFERSON COUNTY KY-IN MMSA.....	21
<b>STATE RATING</b> .....	28
STATE OF ILLINOIS.....	28
STATE OF INDIANA.....	36
STATE OF KENTUCKY.....	50
STATE OF MICHIGAN.....	57
STATE OF OHIO.....	64
<b>APPENDIX A: SCOPE OF EXAMINATION</b> .....	A-1
<b>APPENDIX B: SUMMARY OF MULTISTATE METROPOLITAN AREA AND STATE RATINGS</b> .....	B-1
<b>APPENDIX C: MARKET PROFILES FOR FULL-SCOPE AREAS</b> .....	C-1
<b>APPENDIX D: TABLES OF PERFORMANCE DATA</b> .....	D-1

## Overall CRA Rating

**Bank’s CRA Rating:** This bank 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		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The bank’s geographic distribution of loans is good. The geographic distribution of home mortgage loans is adequate, and the geographic distribution of small loans to businesses is excellent.
- Overall, the distribution of loans by income level of the borrower is good. The bank’s distribution of home mortgage loans by income level of the borrower is good. The bank’s distribution of loans to businesses of different revenue sizes is adequate.
- The bank originated an overall excellent level of qualified community development investments that were generally responsive to community needs.
- Overall, bank branches are accessible to people and geographies of different income levels.

## Definitions and Common Abbreviations

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

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

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

**Census Tract (CT):** Small, relatively permanent statistical subdivisions of a county delineated by local participants as part of the U.S. Census Bureau's Participant Statistical Areas Program. The primary purpose of CTs is to provide a stable set of geographic units for the presentation of decennial census data. CTs generally have between 1,500 and 8,000 people, with an optimum size of 4,000 people.

**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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**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 bank as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Median Family Income (MFI):** The median income derived from the United States Census Bureau's American Community Survey data every 5 years and used to determine the income level category of geographies. Also, it is the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level of individuals within a geography. For any given geography, 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 bank collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data a bank 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 a bank with domestic branches in only one state, the bank's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the bank will receive a rating for each state in which those branches are located. If a bank maintains domestic branches in two or more states within a multi-state metropolitan area, the bank 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 Bank

Old National Bank (ONB or the bank) is a midsize, interstate bank headquartered in Evansville, Indiana. ONB is a wholly owned subsidiary of Old National Bancorp, a bank holding company also located in Evansville, IN. As of December 31, 2015, ONB had total assets of \$11.8 billion, total loans of \$6.9 billion, and Tier One Capital of \$1.02 billion. The largest portion of ONB's loan portfolio consisted of real estate loans at 59 percent. Commercial loans made up the second largest portion of the portfolio at 17 percent. Individual loans represented 16 percent of the portfolio. The rest of the portfolio includes agricultural and other loans at two percent and six percent respectively. ONB operates in Indiana, Illinois, Kentucky, and Michigan.

ONB is a full-service bank that offers a comprehensive array of banking, trust, investment, leasing, mortgage and cash management products, and services to commercial enterprises of all sizes as well as to individual customers. ONB has 162 full-service banking offices in Indiana, Illinois, Kentucky, and Michigan and 120 full-service Automated Teller Machines (ATMs) (74 in Indiana, 2 in Illinois, 7 in Kentucky, and 37 in Michigan) within its assessment areas (AAs). ONB had seven rating areas that include 24 AAs in 5 states that include Indiana, Illinois, Kentucky, Ohio and Michigan. In addition, the bank had two multistate MSA rating areas, Evansville- Henderson IN-KY MMSA and Louisville-Jefferson County KY-IN MMSA.

Since the last evaluation, there has been acquisition activity impacting the bank's CRA performance. ONB's acquisition activity since January 2013 is outlined below.

- July 2013, purchased banking centers from Bank of America in Michigan.
- March 2014, acquired Tower Bank in Ft. Wayne, Indiana.
- August 2014, acquired United Bank and Trust in Michigan.
- February 2015, acquired Lafayette State Bank in Indiana.
- April 2015, acquired Founders Bank and Trust in Michigan.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities. The bank received an Outstanding rating in its previous CRA evaluation dated December 31, 2012.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We analyzed home purchase, home improvement, and home refinance mortgage loans the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses and farms reported under the Community Reinvestment Act (CRA), for the period of January 1, 2013, through December 31, 2015. Primary loan products for this evaluation are products in which the bank originated at least 20 loans within an AA during one or more of the analysis periods within the overall evaluation period. Multifamily loans are not a primary loan product (the bank did not originate or purchase a sufficient volume of loans in any AA to perform a meaningful analysis); therefore, we did not evaluate this product separately. We did consider multifamily loans meeting the CD definition as part of the evaluation of CD lending. While some of the more rural markets had a sufficient quantity of small loans to farms to analyze, the majority of markets had very few, if any. Therefore, small farm lending had no material impact on the Lending Test in most AAs. If we included an analysis of small loans to farms in an AA, we noted it in the narrative for the corresponding rating area.

In our evaluation under the Lending Test geographic distribution and borrower income criteria for some AAs, we performed separate analyses of 2013 data and 2014 through 2015 data. This was due to changes instituted by the 2014 Office of Management and Budget (OMB) geographic boundary revisions. Refer to the “Description” section under each State Rating section for details on those areas impacted by the 2014 OMB changes. Performance Tables 1 through 12 in appendix D include only data covered by the analysis period receiving the greatest weight, namely 2014 through 2015, for those AAs impacted by the OMB changes, and 2013 through 2015 for all other AAs. Data from 2013 (for those AAs impacted by the 2014 OMB changes) is discussed in the applicable narrative sections of the evaluation.

The evaluation period for CD loans, the Investment Test, and the Service Test was January 1, 2013, through December 31, 2015.

### Data Integrity

As part of our ongoing supervision of the bank, we tested the accuracy of the bank’s HMDA and CRA lending data. We also reviewed the appropriateness of CD activities (loans, investments, and services) provided for consideration in our evaluation. We concluded that the home mortgage loans, small loans to businesses and farms, and CD data could be relied upon for this evaluation.

### 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/multistate metropolitan area was selected for full-scope reviews. Refer to the “Scope” section under each State and Multistate Metropolitan Area Rating section (as applicable) for details regarding how the areas were selected.

### Ratings

The bank’s overall rating is a blend of MMSA and state ratings. The state ratings are based primarily on those areas that received full-scope reviews. Refer to the “Scope” section under each State Rating

section for details regarding how the areas were weighted in arriving at the respective ratings. The bank's performance in the state of Indiana carried the greatest weight in our conclusion because it represented the bank's most significant AA based on deposit concentration, branch distribution, and reportable loans. As of June 30, 2015, the state of Indiana represented 51.49 percent of total deposits, 57.41 percent of total branches, and 55.84 percent of loans. The state of Michigan represented 15.03 percent of total deposits, 22.22 percent of total branches, and 11.44 percent of loans. The Evansville-Henderson MMSA represented 18.57 percent of total deposits, 9.88 percent of total branches, and 16.06 percent of loans.

In our analysis of the bank's performance under the Lending Test geographic distribution and borrower income distribution criteria, we placed more weight on the bank's performance in 2014 through 2015 than 2013 for those AAs impacted by the 2014 OMB changes to reach our conclusions. This was due to the 2014 through 2015 time period containing a majority of the bank's performance along with being more reflective of its current performance.

Additionally, when evaluating the bank's performance under the Lending Test, we placed greater weight on home mortgage loans than small loans to businesses or small loans to farms. We placed greater emphasis on home mortgage loans due to it being the bank's primary loan product in terms of volume and based on the home mortgage credit needs in all AAs. Within home mortgage loans, home refinance loans received the greatest weight, home purchase loans somewhat lesser weight, and home improvement loans lesser weight. These weights were based on the volume in number in each home mortgage loan category over the evaluation period. Small loans to farms received minimal weight in all AAs where there was sufficient volume to perform a meaningful analysis, with the exception of the IN non-MSA and OH non-MSA. Refer to the Scope of Evaluation in Indiana and Scope of Evaluation in Ohio for more information on how small loans to farms were weighted.

### **Community Contacts**

Refer to the market profiles in Appendix C for community contact information as well as detailed demographics and other performance context information for the AAs that received full-scope reviews.

### **Inside/Outside Ratio**

This ratio is a bank-wide calculation and not calculated by individual rating area or AA. The analysis is limited to bank origination and purchases and does not include any affiliate data. For the combined three-year evaluation period, ONB originated a significant majority of all loan products inside the bank's AAs (90.38 percent). The percentage in number of loans made inside the AAs by loan type are as follows: home refinance loans (90.99 percent), home purchase loans (89.34 percent), home improvement loans (91.51 percent), small loans to businesses (90.24 percent), and small loans to farms (89.37 percent).

### **Other Performance Data – Lending Test**

#### **Product Innovation and Flexibility**

ONB offers government-guaranteed loan products including FHA, VA, and SBA loans. These loans are included in the totals for home purchase loans and small loans to businesses. ONB originated a total of

555 FHA loans totaling \$66.5 million and 144 of VA loans totaling \$23.3 million, during the evaluation period.

Additional lending programs were considered in the bank's overall lending performance; they had a positive impact on the performance. The bank used a proprietary affordable mortgage loan product to meet the affordable housing needs of low- and moderate-income individuals. In addition, the bank participates in some flexible mortgage lending programs benefitting underserved markets and/or LMI individuals or families in various states. ONB has mortgage staff dedicated to working with low-income and first-time homebuyers. A review of these loan products follows:

#### Amish and Old Order Mennonite Residential Mortgage

This proprietary mortgage loan product targets the underserved Amish and Old Order Mennonite borrowers who do not qualify for traditional loan products offered by ONB but seek financing for the purchase or construction of a primary residence. The borrowers typically have housing and income ratios that exceed bank guidelines. In addition, the home (collateral) typically does not have electricity or electrical wiring, heating or air conditioning, a certified or licensed contractor, or agency underwritten hazard insurance protection. ONB manually underwrites these loans using a modified cost of living allowance for debt service calculations that excludes or reduces the allowances for insurance, food, housing, and transportation expenses. In addition, there is no minimum credit score and applicants need not have a credit score. ONB originated 17 of these loans totaling \$2.6 million during the evaluation period.

#### Home Manager Mortgage

The flexible loan underwriting criteria for this proprietary mortgage loan product includes 97.0 percent financing with no private mortgage insurance requirements. This product offers applicants the ability to use down payment funds from personal savings, a gift from a family member, or in the form of a grant from a qualified agency. Home Manager Mortgages are restricted to low- and moderate-income borrowers who complete a HUD Certified Home Buyer Education Program and those who do not qualify for FHA. Successful completion of the homebuyer counseling may qualify a borrower for down payment assistance. ONB originated 99 of these loans totaling \$8.0 million during the evaluation period.

ONB works in conjunction with state housing agencies and city or county programs to offer affordable FHA and VA products to first time and non-first time homebuyers. These programs may include down payment and closing cost assistance. ONB has worked with Kentucky Housing Corporation, Indiana Housing and Community Development Authority, and Michigan State Housing Development Authority to offer flexible, affordable loan products under these agencies programs. ONB leveraged these programs to originate 42 loans totaling \$2.7 million during the evaluation period.

## **Fair Lending or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or Federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau.

The OCC found evidence of a violation of section 5 of the Federal Trade Commission (FTC) Act involving the bank's failure to initially issue promised gift cards as part of a loan promotion. The bank has completed restitution to all affected borrowers and has strengthened procedures going forward.

The OCC does not have public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

The OCC will consider any evidence of discriminatory or other illegal credit practices relative to this institution that other regulators may provide to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information provided concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## Multistate Metropolitan Area Rating

### Evansville-Henderson IN-KY MMSA

**CRA rating for the Evansville-Henderson IN-KY MMSA<sup>1</sup>: Outstanding**

**The lending test is rated: Outstanding**

**The investment test is rated: Outstanding**

**The service test is rated: Outstanding**

The major factors that support this rating include:

- The geographic distribution of loans reflects good penetration among geographies of different income levels, with good home mortgage and excellent small loans to businesses performance;
- Overall good borrower income distribution of loans, with good penetration among home mortgage borrowers of different income levels, and adequate penetration among businesses of different revenue sizes;
- Exceptionally strong CD lending that was responsive to identified needs. This performance had a significantly positive impact on lending performance;
- ONB's responsiveness to identified needs of the AA and the overall level of qualified community development investments is excellent; and
- The geographic distribution of branch offices and level of community development services are excellent.

### Description of Bank's Operations in Evansville-Henderson IN-KY MMSA

Old National Bank has defined Posey, Vanderburgh, and Warrick counties in Indiana and Henderson County in Kentucky as the Evansville-Henderson IN-KY MMSA AA. According to the 2014 OMB changes, the MMSA was adjusted; whereby Gibson county in IN was removed from the MMSA and redesignated as a non-MSA county. Based on the FDIC Summary of Deposit information as of June 30, 2015, the bank had \$1.65 billion in deposits in the Evansville-Henderson IN-KY MMSA, which represented 18.57 percent of the bank's total deposits.

The bank has 16 branch locations and 15 deposit-taking ATMs within the MMSA. The bank achieved a 30.29 percent market share of deposits, ranking second among 96 banks in the MMSA. Primary competitors include Fifth Third Bank, First Federal Savings Bank, German American Bancorp, and United Fidelity Bank, FSB.

Refer to the market profile for the Evansville-Henderson IN-KY MMSA in appendix C for detailed demographics and other performance context information for the AA.

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<sup>1</sup> 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 MMSA**

The Evansville-Henderson IN-KY MMSA was selected for analysis using full-scope procedures as it is the only AA in the rating area. Refer to the table in Appendix A for more information on the Evansville-Henderson IN-KY MMSA.

## **LENDING TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the lending test in Evansville-Henderson IN-KY MMSA is rated Outstanding.

### **Lending Activity**

The bank's overall lending activity is good, considering the strong competition for all types of loans in the AA. The bank's lending activity for home mortgage lending activity is good, small business lending activity is good, and small farm lending is adequate.

Refer to Table 1 Lending Volume in the Evansville-Henderson IN-KY MMSA section of appendix D for the facts and data used to evaluate the bank's lending activity.

Based upon FDIC Deposit Market Share data as of June 30, 2015, ONB achieved a 30.29 percent market share of deposits, ranking second among 96 financial institutions in the AA, and ranking them in the top 2.1 percent of total depository banks.

Based upon 2015 Peer Mortgage Data, the bank achieved a 4.21 percent market share of home purchase loans, ranking fourth among 176 reporting lenders and is equivalent to being in the top 2.27 percent of lenders. In addition, the top three home purchase lenders collectively had 21.75 percent of the total market share. The bank achieved a 13.18 percent market share of home improvement loans, ranking third among 51 reporting lenders and is equivalent to being in the top 5.88 percent of lenders. The bank also achieved a 4.14 percent market share of home refinance loans, ranking fifth among 168 reporting lenders and is equivalent to being in the top 2.98 percent of lenders. For home refinance loans, the top four lenders collectively had 35.72 percent of the total market share.

Based upon 2015 Peer CRA Data, the bank achieved a 12.89 percent market share of small loans to businesses, ranking first among 55 reporting lenders. The bank achieved a 9.62 percent market share for lending to small farms, ranking fourth among 17 reporting lenders, or the top 23.53 percent of lenders. The top three lenders for small farms consisted of the nation's largest banks and collectively had 74.62 percent of the market share. Individual market shares of these national banks ranged from 17.31 percent to 3.08 percent.

### **Distribution of Loans by Income Level of the Geography**

The bank's overall geographic distribution of loans by income level is good. The bank's geographic distribution of home mortgage loans is adequate, small loans to businesses is excellent, and small farm loans is adequate.

### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4, and 5 in the Evansville-Henderson IN-KY MMSA 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.

The bank's geographic distribution of home purchase loans is good, when considering performance in 2013. The geographic distribution of home purchase loans in 2014 through 2015 was excellent. The percentage of loans made in low-income geographies was below the percentage of owner-occupied units in these geographies. The percentage of loans made in moderate-income geographies was near to the percentage of owner-occupied units in these geographies. The bank's market share in low-income census tracts exceeded its overall market share for home purchase loans. The bank's market share in moderate-income census tracts approximated its overall market share for home purchase loans. The bank's performance in 2013 was weaker than the performance noted in 2014 through 2015, and was adequate. Performance was weaker due to weaker bank performance to demographics in both low- and moderate-income geographies. This performance had a negative impact on the overall home purchase conclusion.

The bank's geographic distribution of home improvement loans is good, when considering performance in 2014-2015. The geographic distribution of home improvement loans in 2014 through 2015 was good. The percentage of loans made in low-income geographies was near to the percentage of owner-occupied units in these geographies. The percentage of loans made in moderate-income geographies was near to the percentage of owner-occupied units in these geographies. The bank's market share in low-income census tracts exceeded its overall market share for home improvement loans. The bank's market share in moderate-income census tracts was near to its overall market share for home improvement loans. The bank's performance in 2013 was weaker than performance noted in 2014 through 2015, and was adequate. Performance was weaker due to weaker performance in both low- and moderate-income geographies. This performance was not significant enough to impact the overall home improvement conclusion.

The bank's geographic distribution of home refinance loans is good, when considering performance in 2014-2015. The geographic distribution of home refinance loans in 2014 through 2015 was good. The percentage of loans made in low-income geographies was below the percentage of owner-occupied units in these geographies. The percentage of loans made in moderate-income geographies approximated the percentage of owner-occupied units in these geographies. The bank's market share in low-income census tracts was near its overall market share for home refinance loans. The bank's market share in moderate-income census tracts exceeded its overall market share for home refinance loans. The bank's performance in 2013 was weaker than the performance noted in 2014-2015, and is adequate.

### ***Small Loans to Businesses***

Refer to Table 6 in the Evansville-Henderson IN-KY MMSA 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 overall geographic distribution for small loans to businesses is excellent. The geographic distribution of small loans to businesses in 2014 through 2015 was excellent. The percentage of loans

made in low-income geographies exceeded the percentage of businesses in those geographies. The percentage of loans made in moderate-income geographies exceeded the percentage of businesses in those geographies. The bank's market share in low-income geographies exceeded its overall market share for small loans to businesses. The bank's market share in moderate-income geographies exceeded its overall market share for small loans to businesses. The bank's performance in 2013 was not inconsistent with the performance noted in 2014 through 2015, and was excellent.

### ***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/purchase of small loans to farms.

The overall geographic distribution for small loans to farms is adequate, when considering performance in 2013. The geographic distribution of small loans to farms in 2014 through 2015 was poor, when considering the very limited opportunities to make these loans. The bank did not originate or purchase small farms loans in either low- or moderate-income geographies. However, with only nine farms in low-income geographies and 84 farms in moderate-income geographies, there are very limited opportunities for the bank to originate or purchase small loans to farms. The bank's performance in 2013 was stronger than the performance noted in 2014 through 2015, and was good. When coming to this conclusion we considered the very limited opportunities for the bank to originate or purchase small loans to farms in the AA, with only 21 farms in low-income geographies and 135 farms in moderate-income geographies. The stronger performance was due to excellent performance in low-income geographies. This performance had a positive impact on the overall small loans to farms conclusion.

### ***Lending Gap Analysis***

We evaluated the lending distribution in the Evansville-Henderson IN-KY MMSA to determine if any unexplained, conspicuous gaps existed. We used basic dot density maps and other reports on HMDA and CRA loan data to compare the geographies where loans were made to the geographies in the AA. We also considered competition, market conditions, and demographic information. No unexplained, conspicuous gaps were identified.

## **Distribution of Loans by Income Level of the Borrower**

The bank's overall borrower distribution of loans by income level is good. The bank's borrower distribution of home mortgage loans is good, small business loans is adequate, and small farm loans is good.

### ***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in the Evansville-Henderson IN-KY MMSA 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.

The overall borrower distribution of home purchase loans is adequate. The borrower distribution of home purchase loans in 2014 through 2015 was good. The percentage of loans to low-income borrowers is considered good. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share to low-income borrowers was near to

its overall market share for home purchase loans. The bank's market share to moderate-income borrowers was near to its overall market share for home purchase loans. The bank's performance in 2013 was not inconsistent with the performance noted in 2014 through 2015, and was good.

The overall borrower distribution of home improvement loans is good. The borrower distribution of home improvement loans in 2014 through 2015 was excellent. The percentage of loans to low-income borrowers is considered good. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share to low-income borrowers exceeded its overall market share for home improvement loans. The bank's market share to moderate-income borrowers exceeded its overall market share for home improvement loans. The bank's performance in 2013 was not inconsistent with the performance noted in 2014 through 2015, and was excellent.

The overall borrower distribution of home refinance loans is good. The borrower distribution of home refinance loans in 2014 through 2015 was good. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share to low-income borrowers was below its overall market share for home refinance loans. The bank's market share to moderate-income borrowers exceeded its overall market share for home refinance loans. The bank's performance in 2013 was not inconsistent with the performance noted in 2014-2015, and was adequate.

### ***Small Loans to Businesses***

Refer to Table 11 in the Evansville-Henderson IN-KY MMSA 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 overall borrower distribution of small loans to businesses is adequate. The borrower distribution of small loans to businesses in 2014 through 2015 was adequate when considering market share performance. The percentage of small loans made to small businesses (businesses with gross annual revenues of \$1 million or less) was well below the percentage of small businesses in those geographies. However, the bank's market share of small loans to small businesses exceeded its overall market share of small loans to businesses. The bank's performance in 2013 was stronger than the performance noted in 2014 through 2015, and was good, due to stronger performance to demographics.

### ***Small Loans to Farms***

Refer to Table 12 in the Evansville-Henderson IN-KY MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

The overall borrower distribution of small loans to farms is good. The borrower distribution of small loans to farms in 2014 through 2015 was good when considering market share performance. The percentage of small loans to small farms (farms with gross annual revenue of \$1 million or less) was below the percentage of farms in those geographies. However, the bank's market share of small loans to small farms exceeded its overall market share of small loans to farms. The bank's performance in 2013 was not inconsistent with the performance noted in 2014 through 2015, and was good.

## Community Development Lending

Refer to Table 1 Lending Volume in the Evansville-Henderson IN-KY MMSA section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes borrower lending data on all multifamily loans, including those that also qualify as community development loans. However, table 5 does not separately list community development loans.

CD lending was exceptionally strong, and had a significantly positive impact on the lending performance in the Evansville-Henderson IN-KY MMSA AA. This performance compensated for overall good retail lending performance. During the evaluation period, the bank originated 16 CD loans totaling \$25.4 million, or 13.36 percent of Tier 1 capital allocated to the AA.

Examples of the CD loans originated during this evaluation period include:

- A loan for \$10.3 million that revitalized downtown Evansville. The loan supported financing to support the construction of a new IU Medical School to be located in downtown Evansville. New service jobs will be created, a public clinic will be housed on-site for area residents, and include a wing to support approximately 1,000 IVY Tech Community College students. The project is located downtown, which is in the Downtown Redevelopment Area as designated by the Evansville Redevelopment Commission. The initiative is focused on economic development, business expansion, and revitalization for the area.
- A construction loan for \$4.2 million that addressed affordable housing. The loan supported the development of a 36 unit senior housing facility in conjunction with low-income housing tax credits (LIHTC). The program was awarded a Federal Home Loan Bank of Indiana Affordable Housing Program grant due to the bank's sponsorship.
- A loan for \$1.35 million, which was renewed during the examination period, to support community services. The nonprofit borrower provides employment programs which allow individuals with disabilities to work, develop skills, and behaviors to maintain employment within the community. Over 43 participants obtained new jobs through this program, which are considered low- or moderate income.

## Product Innovation and Flexibility

Flexible and innovative loan programs had a neutral impact on the bank's lending performance in the Evansville-Henderson IN-KY MMSA. Refer to the Other Performance Data – section in the overall Scope of Evaluation section for additional information.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the Evansville, IN-KY MMSA is Outstanding. Based on the full-scope review, the bank's performance in the Evansville, IN-KY MMSA is excellent. Refer to Table 14 in the Evansville-Henderson IN-KY MMSA section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

ONB exhibited excellent responsiveness to the community development investment needs in the AA. Current period investments in the AA total \$20.6 million that directly and positively affect the AA. There were no prior period investments. ONB invested \$10 million into a new convention center hotel in downtown Evansville. The hotel is a critical component of the City of Evansville's Integrated Downtown Restoration Project that will include a new campus for the Indiana School of Medicine – Evansville. ONB's senior management team played a leadership role in securing the necessary funding for the hotel. This was a particularly complex and challenging negotiation process covering several years. Management's efforts resulted in a successful public and private partnership that secured the hotel's construction. In addition, the bank invested \$8.4 million in CRA qualifying mortgage backed securities backed by single-family and multifamily mortgages. While not innovative, these investments do provide ongoing responsiveness to affordable housing needs in the community. Other investments included the \$100 thousand capitalization of a micro-finance pool for women- and minority-owned small businesses.

Current period investments also include 273 grants for \$2.1 million that primarily support community services to low- and moderate-income families and economic development in support for small business development.

The investments were responsive to identified CD needs. These include grants for CD service providers, expanding the supply of affordable housing for LMI individuals, low-cost mortgages for LMI borrowers, financing for multifamily housing for LMI residents, technical assistance for small businesses, and job training opportunities for health care, service, and manufacturing jobs.

To provide perspective regarding the relative level of qualified community development investments, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The dollar amount of the investments represent 10.84 percent of the allocated portion of the bank's Tier One Capital in the Evansville, IN-KY MMSA.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the service test in Evansville-Henderson IN-KY MMSA is rated Outstanding. Based on full-scope reviews, the bank's performance in the Evansville-Henderson IN-KY MMSA is excellent.

### **Retail Banking Services**

Refer to Table 15 in the Evansville-Henderson IN-KY MMSA 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 branches are accessible to essentially all portions of the AA. Access to banking services in low- and moderate-income geographies is considered excellent. The bank operates 16 full-service branch offices in the Evansville MMSA. The bank's percentage of branches in low- and moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank did not open or close any branches during the evaluation period.

Banking services and hours do not vary in a way that negatively affects low- or moderate-income geographies or individuals and provide reasonable accommodation to the bank's entire AA. ONB offers a wide range of traditional deposit and banking products. The services offered and hours of operation are comparable among locations regardless of the income level of the geography.

The bank makes adequate use of alternative delivery systems through ATMs, telephone and on-line banking, electronic bill pay, and mobile banking options. ONB operates 15 deposit-taking ATMs in the Evansville MMSA. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

## Community Development Services

ONB's level of community development services is excellent. ONB management members were actively involved in providing leadership to over 80 different community development organizations. During the evaluation period, ONB employees recorded 6,110 hours of qualified community development service. Bank personnel reported 3,608 service hours serving on the Board of Directors of organizations and 2,502 service hours using their financial expertise to provide technical assistance to qualified organizations.

ONB provided financial education training to 16,427 LMI adults and school-aged children in the Evansville-Henderson IN-KY MMSA AA. The training addresses basic banking functions, budgeting skills and improving credit scores. The school-age children received instruction on financial literacy through programs such as Junior Achievement and a proprietary program, Realityapolis. ONB also developed a financial literacy program for female inmates, the 12 Steps to Financial Success. Both in-house developed programs demonstrate leadership and innovativeness.

- **Realityapolis** is an interactive, hands-on game that helps middle school student's development of financial knowledge. Developed in conjunction with the Girl Scouts of Southwest Indiana, Realityapolis players draw cards to determine their job, income, marital status, and family size. They then work their way through the game, making financial decisions as they acquire "assets" and pay for normal everyday living expenses. During the evaluation period, 650 LMI students participated in the program.
- **The 12 Steps to Financial Success Financial Literacy Program** was developed in partnership with the Henderson County Detention Center's Substance Abuse Program. In an effort to help non-violent offenders avoid re-incarceration, the program educates female inmates on money management. The bank was nationally recognized for the program, receiving the ABA Distinguished Service Award in 2015. During the evaluation period, 50 inmates participated in the program.

ONB spearheaded two additional programs showcasing the bank's commitment to financial literacy:

- **Bank On Evansville (BOE)** is member of Bank on Indiana, a statewide initiative and collaborative effort among the Office of the Treasurer of Indiana, nonprofit organizations, banks and credit unions, and trade associations eager to connect the unbanked with the opportunity to open and maintain safe, affordable checking accounts. ONB led the way in implementing the

first Bank On program in the Midwest and has played key role in developing other community's programs (Bank on Henderson for example). BOE is heavily focused on financial education. ONB helped launch a quarterly series of financial workshops in February 2015. During the evaluation period, approximately 492 individuals participated in the BOE's financial education program.

- **Financial Coaching**, in partnership with Ivy Tech Community College of Southwest Indiana, provided free financial coaching to local students. ONB started the program in 2010 and during the evaluation period, bank employees conducted 24 classes serving 24 LMI participants.

## Multistate Metropolitan Area Rating

### Louisville-Jefferson County KY-IN MMSA

**CRA rating for the Louisville-Jefferson: Outstanding<sup>2</sup>**

**The lending test is rated: Outstanding**

**The investment test is rated: Outstanding**

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

The major factors that support this rating include:

- The geographic distribution of loans reflects good penetration among geographies of different income levels, with good home mortgage and excellent small loans to businesses performance;
- Overall adequate borrower income distribution of loans, with good penetration among home mortgage borrowers of different income levels, and poor penetration among businesses of different revenue sizes;
- The bank provided an excellent level of community development loans;
- The bank's qualified investment performance is excellent, and was responsive to community needs;
- ONB's overall branch distribution is good; and
- ONB provided an exceptionally high level of CD services in the AA.

### Description of Bank's Operations in Louisville-Jefferson County KY-IN MMSA

Old National Bank has defined Jefferson County in Kentucky and the Washington County in Indiana as the Louisville-Jefferson County KY-IN MMSA.

Based on the FDIC Summary of Deposit information as of June 30, 2015, the bank had \$174.2 million in deposits in the Louisville-Jefferson County KY-IN MMSA, which represented 1.96 percent of the bank's total deposits.

The bank has five branch locations and four deposit-taking ATMs within the MMSA. The bank achieved a 0.97 percent market share of deposits, ranking twelfth among 28 banks in the AA. Primary competitors include PNC Bank NA, Fifth Third Bank, JPMorgan Chase Bank NA, Branch Banking and Trust Company, US Bank NA.

Refer to the market profile for the Louisville-Jefferson County KY-IN MMSA in appendix C for detailed demographics and other performance context information for the AA.

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<sup>2</sup> 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 Louisville-Jefferson County KY-IN MMSA**

The Louisville-Jefferson County KY-IN MMSA was selected for analysis using full-scope procedures as it is the only AA in the rating area. The bank did not originate or purchase a sufficient volume of small loans to farms in the AA to perform a meaningful analysis. Refer to the table in Appendix A for more information on the Louisville-Jefferson County KY-IN MMSA.

## **LENDING TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the lending test in Louisville-Jefferson County KY-IN MMSA is rated Outstanding.

### **Lending Activity**

The bank's overall lending activity is good, considering the strong competition for all types of loans in the AA. The bank's lending activity for home mortgage lending activity is good, and small business lending activity is good. Refer to Table 1 Lending Volume in the Louisville-Jefferson County KY-IN MMSA section of appendix D for the facts and data used to evaluate the bank's lending activity.

Based upon FDIC Deposit Market Share data as of June 30, 2015, ONB achieved a 0.97 percent market share of deposits, ranking 12<sup>th</sup> among 28 financial institutions in the AA, and ranking them in the top 42.9 percent of total depository banks.

Based upon 2015 Peer Mortgage Data, the bank achieved a 0.26 percent market share of home purchase loans, ranking 61<sup>st</sup> among 292 reporting lenders and is equivalent to being in the top 20.89 percent of lenders. In addition, the top five home purchase lenders collectively had 32.00 percent of the total market share. The bank achieved a 1.49 percent market share of home improvement loans, ranking 13<sup>th</sup> among 110 reporting lenders and is equivalent to being in the top 11.82 percent of lenders. The top five home improvement lenders collectively had 54.91 percent of the total market share. The bank also achieved a 0.44 percent market share of home refinance loans, ranking 39<sup>th</sup> among 252 reporting lenders and is equivalent to being in the top 15.48 percent of lenders. For home refinance loans, the top five lenders collectively had 30.02 percent of the total market share.

Based upon 2015 Peer CRA Data, the bank achieved a 0.43 percent market share of small loans to businesses, ranking 20<sup>th</sup> among 83 reporting lenders, or the top 24.10 percent of lenders. The top five lenders for small business lending consisted of the nation's largest credit card lenders, which collectively had 62.09 percent of the market share.

### **Distribution of Loans by Income Level of the Geography**

The bank's overall geographic distribution of loans by income level is good. The bank's geographic distribution of home mortgage loans is good, and small loans to businesses is excellent.

#### ***Home Mortgage Loans***

The overall geographic distribution for home mortgage loans is good.

Refer to Tables 2, 3, 4, and 5 in the Louisville-Jefferson County KY-IN MMSA 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.

The overall geographic distribution of home purchase loans is good when considering market share performance. The percentage of loans made in low-income geographies is well below the percentage of owner-occupied units in these geographies. The percentage of loans made in moderate-income geographies was below the percentage of owner-occupied units in these geographies. The bank's market share in low-income census tracts was near to its overall market share for home purchase loans. The bank's market share in moderate-income census tracts met its overall market share for home purchase loans.

The overall geographic distribution of home improvement loans is adequate. The bank did not originate or purchase any home improvement loans in low-income geographies. The percentage of loans made in moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income census tracts exceeded its overall market share for home improvement loans.

The overall geographic distribution of home refinance loans is good when considering market share performance. The percentage of loans made in low-income geographies was significantly below the percentage of owner-occupied units in these geographies. The percentage of loans made in moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank's market share in low-income census tracts exceeded its overall market share for home refinance loans. The bank's market share in moderate-income census tracts exceeded its overall market share for home refinance loans.

### ***Small Loans to Businesses***

Refer to Table 6 in the Louisville-Jefferson County KY-IN MMSA 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 overall geographic distribution for small loans to businesses is excellent. The percentage of loans made in low-income geographies exceeded the percentage of businesses in those geographies. The percentage of loans made in moderate-income geographies exceeded the percentage of businesses in those geographies. The bank's market share in low-income geographies exceeded its overall market share for small loans to businesses. The bank's market share in moderate-income geographies exceeded its overall market share for small loans to businesses.

### ***Lending Gap Analysis***

We evaluated the lending distribution in the Louisville-Jefferson County KY-IN MMSA to determine if any unexplained, conspicuous gaps existed. We used basic dot density maps and other reports on HMDA and CRA loan data to compare the geographies where loans were made to the geographies in the AA. We also considered competition, market conditions, and demographic information. No unexplained, conspicuous gaps were identified.

## **Distribution of Loans by Income Level of the Borrower**

The bank's overall borrower distribution of loans by income level is adequate. Good home mortgage performance was negatively impacted by poor small loans to businesses performance.

### ***Home Mortgage Loans***

Overall, the borrower distribution of home mortgage loans is good.

Refer to Tables 8, 9, and 10 in the Louisville-Jefferson County KY-IN MMSA 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.

The overall borrower distribution of home purchase loans is good. Lending performance to low-income borrowers is considered good, especially when considering that housing is generally not affordable for low-income borrowers. Please see the market profile in appendix C for additional information. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share to low-income borrowers was near to its overall market share for home purchase loans. The bank's market share to moderate-income borrowers was below its overall market share for home purchase loans. The percentage of loans to low-income borrowers was well below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families.

The overall borrower distribution of home improvement loans is excellent when considering market share performance and that housing is generally unaffordable to low-income borrowers. Please see the market profile in appendix C for more information. The percentage of loans to low-income borrowers was well below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share to low-income borrowers exceeded its overall market share for home improvement loans. The bank's market share to moderate-income borrowers exceeded its overall market share for home improvement loans.

The overall borrower distribution of home refinance loans is adequate. The percentage of loans to low-income borrowers was well below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share to low-income borrowers was below its overall market share for home refinance loans. The bank's market share to moderate-income borrowers was below its overall market share for home refinance loans.

### ***Small Loans to Businesses***

Refer to Table 11 in the Louisville-Jefferson County KY-IN MMSA 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 overall borrower distribution of small loans to businesses is poor. The percentage of small loans made to small businesses (businesses with gross annual revenues of \$1 million or less) was well below

the percentage of small businesses. ONB's market share of small loans to small businesses was below its overall market share for small loans to businesses.

## **Community Development Lending**

Refer to Table 1 Lending Volume in the Louisville-Jefferson County KY-IN MMSA section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes borrower lending data on all multifamily loans, including those that also qualify as community development loans. However, table 5 does not separately list community development loans.

CD lending was exceptionally strong, and had a significantly positive impact on the lending performance in the Louisville-Jefferson County KY-IN MMSA AA. This performance compensated for overall adequate retail lending performance. During the evaluation period, the bank originated two CD loans totaling \$22.18 million, or 110.31 percent of Tier 1 capital allocated to the AA. One example of the CD loans originated during this evaluation period included:

- A loan renewal for \$1.2 million for revitalization and stabilization. The loan to a development agency supported projects focusing on low-income and economically distressed areas. One project created 35 permanent jobs as part of Louisville's Downtown Development Plan.

## **Product Innovation and Flexibility**

Flexible and innovative loan programs had a neutral impact on the bank's lending performance in the Louisville-Jefferson County KY-IN MMSA. Refer to the Other Performance Data – section in the overall Scope of Evaluation section for additional information.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the investment test in the Louisville-Jefferson County KY-IN MMSA is Outstanding. Based on the full-scope review, the bank's performance in the AA is excellent.

Refer to Table 14 in the Louisville-Jefferson County KY-IN MMSA section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Current period investments in the AA total \$1.9 million that directly and positively affect the AA. Two prior period investments totaling \$896,000 were still outstanding as of December 31, 2015. Current period investments include a \$250,000 investment in a minority-owned CDFI bank directly serving the AA and \$1.5 million in CRA qualifying mortgage backed securities. While not innovative, this investment does provide ongoing responsiveness to affordable housing needs in the community. Current period investments also include 37 grants for \$116,000 that primarily support community services to low- and moderate-income families, in addition to economic development in support of small business development.

ONB's qualified community development investments exhibited good responsiveness to AA needs. This includes the need for youth services, workforce development, financing for affordable housing, and financial literacy.

To provide perspective regarding the relative level of qualified community development investments, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The dollar amount of the investments, represents 13.49 percent of the allocated portion of the bank's Tier One Capital in the Louisville-Jefferson County KY-IN MMSA.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the service test in Louisville-Jefferson County KY-IN MMSA is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the AA is good.

### **Retail Banking Services**

Refer to Table 15 in the Louisville-Jefferson County KY-IN MMSA 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 branches are accessible to essentially all portions of the AA. The bank operates 5 full-service branch offices in the Louisville MMSA. The percentage of branches in low-income geographies exceeds the percentage of the population living within low-income geographies. The bank does not have any branches located in moderate-income geographies. However, two branches located in middle-income geographies are located within one mile of moderate-income geographies which provides additional access to banking services to people living in these geographies.

ONB's branch openings and closings generally have not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. ONB closed one branch location in Austin, Indiana (acquired in 2012) and located in a moderate-income geography during the evaluation period. The closure was due to a reduction in business activity at that location.

Banking hours do not vary in a way that negatively affects low- or moderate-income geographies or individuals and provide reasonable accommodation to the bank's entire AA. The bank offers a wide range of traditional deposit and banking products.

ONB makes adequate use of alternative delivery systems through ATMs, telephone and on-line banking, electronic bill pay, and mobile banking options. The bank operates 4 deposit-taking ATMs in the Louisville MMSA.

### **Community Development Services**

ONB's performance of providing community development services in the Louisville MSA is excellent. Management focused primarily on delivering financial literacy training to low- and moderate-income residents. ONB personnel conducted a financial literacy training session and a first-time homebuyer

workshop for a housing coalition. Bank employees provided 484 school-age children instruction on financial literacy. In addition, bank personnel reported 480 service hours serving on the Board of Directors of organizations and 234 service hours using their financial expertise to provide technical assistance to qualified organizations. For example, one ONB employee served in a leadership position for the *Bank on Louisville Program*, whose main focus is financial education to low- to moderate-income individuals.

## State Rating

### State of Illinois

<b>CRA Rating for Illinois:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	<b>High Satisfactory</b>
<b>The investment test is rated:</b>	<b>Needs to Improve</b>
<b>The service test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include:

- The geographic distribution of loans reflects good penetration among geographies of different income levels, with good home mortgage and adequate small loans to businesses performance;
- Overall adequate borrower income distribution of loans, with adequate penetration among home mortgage borrowers of different income levels, and adequate penetration among businesses of different revenue sizes;
- The bank demonstrated exceptionally strong CD lending that had a significantly positive impact on lending performance;
- ONB's qualified investment performance is poor; and
- ONB's branch distribution is adequate after considering the access provided to low- and moderate-income residents.

### Description of Bank's Operations in Illinois

Old National Bank has five AAs within the State of Illinois. These AAs include the Danville MSA, the Carbondale-Marion MSA, and three non-contiguous non-MSA AAs. The Danville MSA AA included the only county in the MSA, Vermilion County. As of the end of the evaluation period, the Illinois non-MSA AAs include the counties of Clark, Jefferson, Lawrence, Saline, Wabash, and White. We combined these non-metropolitan areas for analysis purposes. According to the 2014 OMB changes, two of the Illinois AAs were adjusted, namely, the Carbondale-Marion MSA and the Illinois Non-MSA. The Non-MSA counties of Jackson and Williamson were redesignated and formed the Carbondale-Marion MSA.

Based on the FDIC Summary of Deposit information as of June 30, 2015, the bank had \$679.2 million in deposits in the state of Illinois, which represents 7.66 percent of the bank's total deposits.

The bank has 3 branch locations and 1 deposit-taking ATMs within the state. The branch distribution represented 1.85 percent of the bank's total branch network. In the state of Illinois, two branches were divested to Legence Bank in February 2013, two branches were divested to Area Bank in January 2013, and 13 branches were divested to First Mid-Illinois Bancshares, Inc. in August 2015.

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

## **Scope of Evaluation in Illinois**

For the state of Illinois, we completed a full-scope review of the Illinois Non-MSA. The Illinois Non-MSA received a full-scope review due to the high percentage of the bank's deposits (47 percent), branches (33 percent) and loans (47 percent) in the state. The Carbondale-Marion MSA and Danville MSA were reviewed using limited-scope procedures. Ratings are primarily based on the results of full-scope area. When performing the Lending Test analysis, the bank did not originate or purchase a sufficient volume small loans to farms in the Carbondale MSA to perform a meaningful analysis. Please see the table in Appendix A for more information.

When performing the geographic distribution analysis for home mortgage loans in the Lending Test, we identified that the Illinois Non-MSA and Danville MSA AAs had a very limited number of owner-occupied housing units in the low-income geographies in the AAs. In order to determine if this was a valid performance context factor, we analyzed the bank's HMDA data to determine if the bank originated and purchased a significant volume of home mortgage loans with owner-occupied housing units as collateral. Based on our review, a significant volume of home mortgage loans originated and purchased during the evaluation period had owner-occupied housing units as collateral. As such, the level of owner-occupied housing units was considered in our analysis.

## **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 Illinois NON-MSA is good. In the Carbondale-Marion MSA and Danville MSA, the bank's performance is good and excellent, respectively.

### **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.

The bank's overall lending activity is good, considering the strong competition for all types of loans in AA. The bank's lending activity for home mortgage lending activity is good, small business lending activity is adequate, and small farm lending is good.

Based upon FDIC Deposit Market Share data as of June 30, 2015, ONB achieved a 47.10 percent market share of deposits, ranking second among 25 financial institutions in the AA, and ranking them in the top 8 percent of total depository banks.

Based upon 2015 Peer Mortgage Data, the bank achieved a 1.49 percent market share of home purchase loans, ranking 16<sup>th</sup> among 100 reporting lenders and is equivalent to being in the top 16.00 percent of lenders. In addition, the top five home purchase lenders collectively had 46.96 percent of the total market share. The bank achieved an 11.32 percent market share of home improvement loans, ranking first among 34 reporting lenders. The bank also achieved a 1.44 percent market share of home refinance

loans, ranking 18<sup>th</sup> among 84 reporting lenders and is equivalent to being in the top 21.43 percent of lenders. For home refinance loans, the top five lenders collectively had 38.40 percent of the total market share.

Based upon 2015 Peer CRA Data, the bank achieved a 3.16 percent market share of small loans to businesses, ranking ninth among 55 reporting lenders, or the top 16.36 percent of lenders. The top five lenders for small business lending consisted of the nation's largest credit card lenders, which collectively had 56.18 percent of the market share. The bank achieved a 14.18 percent market share for lending to small farms, ranking third among 20 reporting lenders, or the top 15.00 percent of lenders.

## **Distribution of Loans by Income Level of the Geography**

### ***Home Mortgage Loans***

Overall, the geographic distribution of home mortgage loans is good.

Refer to Tables 2, 3, 4, and 5 in the 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.

The overall geographic distribution for home mortgage loans is good. In evaluating the geographic distribution of home loans in the AA, it is important to note that under the 2010 U.S. Census, there was only one low-income census tract in the AA. In addition, the low-income tract contains only 183 owner-occupied housing units. As such, the bank's performance in moderate-income geographies carried significantly greater weight when coming to our overall product conclusions.

The overall geographic distribution of home purchase loans is good. The bank's geographic distribution of home purchase loans in 2014 through 2015 was good when considering the very limited lending opportunities in the low-income geography. The bank did not originate or purchase any loans in the low-income geography; however, there were only 183 owner-occupied housing units in that geography. The percentage of loans made in moderate-income geographies was near to the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income census tracts was well below its overall market share for home purchase loans. The bank's performance in 2013 was weaker than the performance noted in 2014 through 2015, and was adequate. This was due to weaker bank performance to demographics in moderate-income geographies. This performance was not significant enough to impact the overall conclusion.

The overall geographic distribution of home improvement loans is excellent. The bank's geographic distribution of home improvement loans in 2014 through 2015 was excellent when considering the very limited lending opportunities in the low-income geography. The bank did not originate or purchase any loans in the low-income geography; however, there were only 183 owner-occupied housing units in that geography. The percentage of loans made in moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income census tracts exceeded its overall market share for home improvement loans. The bank's performance in 2013 was not inconsistent with the performance noted in 2014-2015, and was good.

The overall geographic distribution of home refinance loans is good when considering market share performance in 2013. The bank's geographic distribution of home refinance loans in 2014 through 2015 was adequate when considering the very limited lending opportunities in the low-income geography.

The bank did not originate or purchase any loans in the low-income geography; however, there were only 183 owner-occupied housing units in that geography. The percentage of loans made in moderate-income geographies was below the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income census tracts was near to its overall market share for home refinance loans. The bank's performance in 2013 was weaker than the performance noted in 2014 through 2015, and was excellent, which had a positive impact on the overall conclusion.

### ***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 overall geographic distribution for small loans to businesses is adequate, when considering performance in 2013. The geographic distribution of small loans to businesses in 2014 through 2015 was poor when considering market share performance. The percentage of loans made in the low-income geography was below the percentage of businesses in those geographies. The percentage of loans made in moderate-income geographies was well below the percentage of businesses in those geographies. The bank's market share in the low-income geography was well below its overall market share for small loans to businesses. The bank's market share in moderate-income geographies was significantly below its overall market share for small loans to businesses. The bank's performance in 2013 was stronger than the performance noted in 2014 through 2015, and was good. This was due to stronger performance in both low- and moderate-income geographies. This performance had a positive impact on the overall conclusion.

### ***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 borrower distribution of the bank's origination/purchase of small loans to farms.

The overall geographic distribution for small loans to farms is good, when considering performance in 2013. The overall geographic distribution of small loans to farms in 2014 through 2015 was excellent when considering market share performance. There are no farms located in the low-income geography. The percentage of loans made in moderate-income geographies near to the percentage of farms in those geographies. The bank's market share in moderate-income geographies exceeded its overall market share for small loans to farms. The bank's performance in 2013 was weaker than the performance noted in 2014 through 2015, and was adequate. This was due to weaker performance in moderate-income geographies. This performance had a negative impact on the overall conclusion.

### ***Lending Gap Analysis***

We evaluated the lending distribution in the Illinois Non-MSA to determine if any unexplained, conspicuous gaps existed. We used basic dot density maps and other reports on HMDA and CRA loan data to compare the geographies where loans were made to the geographies in the AA. We also considered competition, market conditions, and demographic information. No unexplained, conspicuous gaps were identified.

## **Distribution of Loans by Income Level of the Borrower**

The bank's overall borrower distribution of loans by income level is adequate. The bank's borrower distribution of home mortgage loans is adequate, small business loans is adequate, and small farm loans is good. When performing our analysis of home mortgage loans, we considered the relatively high percentage of households below the poverty level during the 2014 through 2015 (15 percent) and 2013 (19 percent) analysis periods.

### ***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.

The overall borrower distribution of home purchase loans is good. The borrower distribution performance in 2014 through 2015 was adequate. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers approximated the percentage of moderate-income families. The bank's market share to low-income borrowers exceeded its overall market share for home purchase loans. The bank's market share to moderate-income borrowers was well below its overall market share for home purchase loans. The bank's performance in 2013 was weaker than the performance noted in 2014 through 2015, and was adequate. This was due to weaker low-income borrower performance. This performance was not significant enough to impact the overall conclusion.

The overall borrower distribution of home improvement loans is excellent. The borrower distribution performance in 2014 through 2015 was excellent when considering market share performance. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share to low-income borrowers exceeded its overall market share for home improvement loans. The bank's market share to moderate-income borrowers exceeded its overall market share for home improvement loans. The bank's performance in 2013 was not inconsistent with the performance noted in 2014 through 2015, and was excellent.

The overall borrower distribution of home refinance loans is adequate. The borrower distribution performance in 2014 through 2015 was adequate. The percentage of loans to low-income borrowers was well below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank did not achieve a market share in low-income geographies. The bank's market share to moderate-income borrowers was somewhat near to its overall market share for home refinance loans. The bank's performance in 2013 was not inconsistent with the performance noted in 2014 through 2015, and was adequate.

### ***Small Loans to Businesses***

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.

The overall borrower distribution to small loans to businesses is adequate. The borrower distribution in 2014 through 2015 was adequate when considering market share performance. The percentage of small loans made to small businesses (businesses with gross annual revenues of \$1 million or less) was well

below the percentage of small businesses in those geographies. However, the bank's market share of small loans to small businesses exceeded its overall market share of small loans to businesses. The bank's performance in 2013 was stronger than the performance noted in 2014 through 2015, and was good. This was due to stronger bank to demographic performance. This performance was not significant enough to impact the overall conclusion.

### ***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/purchase of small loans to farms.

The overall borrower distribution for small loans to small farms is good. The borrower distribution in 2014 through 2015 was good when considering market share performance. The percentage of small loans made to small farms (farms with gross annual revenues of \$1 million or less) was below the percentage of farms in those geographies. However, the bank's market share of small loans to small farms exceeded its overall market share of small loans to farms. The bank's performance in 2013 was not inconsistent with the performance noted in 2014 through 2015, and was good.

### **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 community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes borrower lending data on all multifamily loans, including those that also qualify as community development loans. However, table 5 does not separately list community development loans.

The level of community development lending in the AA is excellent and had a significantly positive impact on the lending performance in the Illinois Non-MSA. This performance elevated overall lending performance. During the evaluation period, the bank originated two CD loans totaling \$8 million, or 21.64 percent of Tier 1 capital allocated to the AA. The two loans address identified needs in the AA of community services, reflecting excellent responsiveness. Loan proceeds support the renovation and expansion of local hospitals, which is part of the City of Carbondale's Comprehensive Plan. The facilities provide healthcare procedures that are rare for rural areas.

### **Product Innovation and Flexibility**

Flexible and innovative loan programs had a neutral impact on the bank's lending performance in the Illinois Non-MSA AA. Refer to the Other Performance Data – section in the overall Scope of Evaluation section for additional information.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the lending test in the Danville MSA is stronger than the bank's overall High Satisfactory performance under the lending test in Illinois due to stronger borrower income distribution performance. In the Carbondale-Marion MSA the bank's performance is weaker than the bank's overall performance in the state. Performance in the limited-scope areas was not significant enough to impact the Lending Test rating in the state.

Refer to the Tables 1 through 13 in the state of Illinois section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the investment test in the state of Illinois is Needs to Improve. Based on the full-scope review, the bank's performance in the Illinois Non-MSA AA is poor.

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.

ONB exhibited a poor level of responsiveness to the community development investment needs in the Illinois Non-MSA. Current period investments total \$396 thousand that directly and positively affect the AA. ONB's investments in the Illinois Non-MSA include two qualified investments totaling \$350,000 and 29 grants and contributions totaling \$46,000. These investments primarily support community services to low- and moderate-income families.

To provide perspective regarding the relative level of qualified community development investments, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The dollar amount of the investments represents 1.07 percent of Tier One Capital allocated to the Illinois Non-MSA.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on the limited-scope review, the bank's performance under the investment test in the Danville IL MSA areas is stronger than the bank's overall poor performance in the state of Illinois. The bank made no investments in the Carbondale-Marion IL MSA area. The performance in the combined limited-scope areas did not have an impact on the investment test rating for the state of Illinois.

Refer to the Table 14 in the state of Illinois 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 the state of Illinois is rated Low Satisfactory. Based on the full-scope review, the bank's performance in the IL Non MSA is adequate.

### **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 branch distribution is considered adequate due to the very limited branch presence. The bank operates one full-service branch office in a middle-income geography in the Illinois Non MSA. Seventy seven percent of the population lives in middle-income geographies. Only one percent of the population lives in the two low-income areas, and nineteen percent of the population lives in moderate-income areas.

The bank's record of opening and closing of branches generally has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. ONB did not open or close branches during the evaluation period; however the bank sold eleven branches in this AA to First Mid-Illinois Bancshares in August 2015.

Banking hours and services do not vary in a way that negatively affects low- or moderate-income geographies or individuals and provide reasonable accommodation to the bank's entire AA. The services offered and hours of operation are comparable among locations regardless of income level of the geography. The bank offers a wide range of traditional deposit and banking products.

ONB makes adequate use of alternative delivery systems through ATMs, telephone and on-line banking, electronic bill pay, and mobile banking options. The bank operates one deposit-taking ATM in the Illinois Non MSA. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

### **Community Development Services**

ONB's performance in providing community development services in the IL Non MSA is good. The bank's efforts reflect excellent responsiveness to AA needs. ONB management members were actively involved in providing leadership to over ten different CD organizations. Bank personnel served on the Board of Directors of eight organizations that provide community development services. ONB management and staff used their financial expertise to provide 349 hours of technical assistance to qualified organizations. These organizations work to create affordable housing, provide healthcare to low- and moderate-income families, and provide education and after school care to children of low- and moderate-income parents.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the service test in the Carbondale MSA is not inconsistent with the overall Low Satisfactory performance in the state. The bank sold the six branches in this AA in August 2015. Performance in the Danville MSA is stronger than the bank's overall performance in the state of Illinois due to stronger branch distribution. The bank's performance in these limited-scope areas was not significant enough to impact the bank's overall service test rating for the state of 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

<b>CRA Rating for Indiana</b>	<b>Satisfactory<sup>3</sup>:</b>
<b>The lending test is rated:</b>	<b>High Satisfactory</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>High Satisfactory</b>

The major factors that support this rating include:

- The geographic distribution of loans reflects good penetration among geographies of different income levels. Adequate home mortgage performance was augmented by excellent small loans to businesses performance;
- Overall good borrower income distribution of loans, with good penetration among home mortgage borrowers of different income levels, and adequate penetration among businesses of different revenue sizes;
- The bank made a relatively high level of CD loans that were responsive to identified needs;
- ONB's qualified investment performance is excellent; and
- ONB's branch distribution is good.

### Description of Bank's Operations in Indiana

Old National Bank has 15 AAs within the State of Indiana. These AAs include the Anderson MSA, Bloomington MSA, Columbus MSA, Elkhart-Goshen MSA, Ft. Wayne MSA, Indianapolis-Carmel-Anderson MSA, Lafayette-West Lafayette MSA, Muncie MSA, South Bend-Mishawaka MSA, Terre Haute MSA, and five non-contiguous non-MSA AAs in the state. The non-MSA AAs include the counties of Jackson, Lawrence, Fountain, Warren, Dubois, Jefferson, Jennings, Orange, Parke, Perry, Spencer, Knox, Daviess, Martin, Randolph, Grant, Jay, Wayne, Ripley, White, Noble, Decatur, Scott, Gibson, and Kosciusko. These non-metropolitan areas were combined for analysis purposes. Within the combined Indiana Non-MSA area, the counties of White, Noble, Decatur, and Scott were only included for 2013. This was due to branch consolidations that occurred in 2013 that removed the branches in these counties. Also, Kosciusko County was added in 2014 as a result of the Tower Bank acquisition. In addition, according to the 2014 OMB changes, three of the Indiana AAs were adjusted, namely, the Anderson MSA, Indianapolis-Carmel-Anderson MSA, and the Indiana Non-MSA. The Anderson MSA ceased to exist with the move of Madison County into the Indianapolis-Carmel-

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<sup>3</sup> For banks 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 bank's performance in that area.

Anderson MSA. The Non-MSA was adjusted with the inclusion of Gibson County, which was moved from the Evansville-Henderson MMSA.

Based on the FDIC Summary of Deposit information as of June 30, 2015, the bank had \$4.56 billion in deposits in the state of Indiana, which represents 51.49 percent of the bank's total deposits. The bank has 93 branch locations and 52 deposit-taking ATMs within the state. The branch distribution represented 57.41 percent of the bank's total branch network.

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**

For the state of Indiana, a full-scope review of the Indianapolis-Carmel-Anderson MSA and Terre Haute MSA was completed. The Anderson MSA, Bloomington MSA, Columbus MSA, Elkhart-Goshen MSA, Lafayette-West Lafayette MSA, Muncie MSA, South Bend-Mishawaka MSA, and Indiana Non-MSA received a limited-scope review. The Indianapolis-Carmel-Anderson MSA and Terre Haute MSA received a full-scope review due to the significant percentage of deposits (27 percent), branches (20 percent), and loan volume (22 percent) in these AAs. The ratings primarily are based on the results of full-scope areas. When performing the Lending Test analysis, the bank did not originate or purchase a sufficient volume of home purchase loans in the Anderson MSA or Elkhart MSA to perform a meaningful analysis. Similarly, the bank did not originate or purchase a sufficient volume of home improvement loans in the Anderson MSA to perform a meaningful analysis. Finally, the bank originated or purchased a sufficient volume of small loans to farms only in the Terre Haute MSA, Indiana Non-MSA, and Muncie MSA to perform a meaningful analysis. Refer to the table in Appendix A for more 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 Indianapolis-Carmel-Anderson MSA and Terre Haute MSA is excellent and good, respectively. The combined performance in the limited-scope areas contributed to the overall Lending Test rating in the state.

### **Lending Activity**

The bank's overall lending activity is good for all types of loans in AA.

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.

### **Indianapolis-Carmel-Anderson MSA**

The bank's overall lending activity is good, considering the strong competition for all types of loans in AA. The bank's lending activity for home mortgage lending activity is good, and small business lending activity is good.

Based upon FDIC Deposit Market Share data as of June 30, 2015, ONB achieved a 2.19 percent market share of deposits, ranking ninth among 44 financial institutions in the AA, and ranking them in the top 20.5 percent of total depository banks.

Based upon 2015 Peer Mortgage Data, the bank achieved a 0.40 percent market share of home purchase loans, ranking fifty-fifth among 443 reporting lenders and is equivalent to being in the top 12.42 percent of lenders. In addition, the top five home purchase lenders collectively had 26.13 percent of the total market share. The bank achieved a 4.58 percent market share of home improvement loans, ranking sixth among 146 reporting lenders and is equivalent to being in the top 4.11 percent of lenders. The top five home improvement lenders collectively had 45.12 percent of the total market share. The bank also achieved a 0.63 percent market share of home refinance loans, ranking thirty-eighth among 405 reporting lenders and is equivalent to being in the top 9.38 percent of lenders. For home refinance loans, the top five lenders collectively had 27.43 percent of the total market share.

Based upon 2015 Peer CRA Data, the bank achieved a 1.76 percent market share of small loans to businesses, ranking sixteenth among 116 reporting lenders, or the top 13.79 percent of lenders. The top five lenders for small business lending consisted of the nation's largest credit card lenders, which collectively had 58.47 percent of the market share.

### **Terre Haute MSA**

The bank's overall lending activity is excellent, considering the strong competition for all types of loans in AA. The bank's lending activity for home mortgage lending activity is excellent, small business lending activity is good, and small farm lending is poor.

Based upon FDIC Deposit Market Share data as of June 30, 2015, ONB achieved a 17.03 percent market share of deposits, ranking second among nine financial institutions in the AA, and ranking them in the top 22.2 percent of total depository banks.

Based upon 2015 Peer Mortgage Data, the bank achieved a 2.60 percent market share of home purchase loans, ranking ninth among 109 reporting lenders and is equivalent to being in the top 8.26 percent of lenders. In addition, the top five home purchase lenders collectively had 51.77 percent of the total market share. The bank achieved a 29.21 percent market share of home improvement loans, ranking second among 29 reporting lenders and is equivalent to being in the top 6.90 percent of lenders. The bank also achieved an 8.45 percent market share of home refinance loans, ranking third among 96 reporting lenders and is equivalent to being in the top 3.13 percent of lenders.

Based upon 2015 Peer CRA Data, the bank achieved an 8.04 percent market share of small loans to businesses, ranking fifth among 40 reporting lenders, or the top 12.50 percent of lenders. The top four lenders for small business lending consisted of the nation's largest credit card lenders, which collectively had 60.77 percent of the market share. The bank achieved a 4.48 percent market share for lending to small farms, ranking fourth among 10 reporting lenders, or the top 40.00 percent of lenders. The top three lenders for small farms consisted of the nation's largest banks and collectively had 87.32 percent of the market share.

## **Distribution of Loans by Income Level of the Geography**

### ***Home Mortgage Loans***

The overall geographic distribution for home mortgage loans is adequate. The geographic distribution in Indianapolis-Carmel-Anderson MSA and Terre Haute MSA are adequate.

Refer to Tables 2, 3, 4, and 5 in the 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.

### **Indianapolis-Carmel-Anderson MSA**

Overall, the geographic distribution of home mortgage loans is adequate.

The overall geographic distribution of home purchase loans is excellent. The bank's geographic distribution of home purchase loans in 2014 through 2015 was excellent. The percentage of loans made in low-income geographies exceeded the percentage of owner-occupied units in these geographies. The percentage of loans made in moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank's market share in low-income census tracts exceeded its overall market share for home purchase loans. The bank's market share in moderate-income census tracts exceeded its overall market share for home purchase loans. The bank's performance in 2013 was not inconsistent with the performance noted in 2014 through 2015, and was excellent.

The overall geographic distribution of home improvement loans is adequate. The bank's geographic distribution of home improvement loans in 2014 through 2015 was adequate. The percentage of loans made in low-income geographies was significantly below the percentage of owner-occupied units in these geographies. The percentage of loans made in moderate-income geographies was below the percentage of owner-occupied units in these geographies. The bank's market share in low-income census tracts was well below its overall market share for home improvement loans. The bank's market share in moderate-income census tracts exceeded its overall market share for home improvement loans. The bank's performance in 2013 was not inconsistent with the performance noted in 2014-2015, and was adequate.

The overall geographic distribution of home refinance loans is poor when considering market share performance. The bank's geographic distribution of home refinance loans in 2014 through 2015 was poor. The percentage of loans made in low-income geographies was significantly below the percentage of owner-occupied units in these geographies. The percentage of loans made in moderate-income geographies was well below the percentage of owner-occupied units in these geographies. The bank's market share in low-income census tracts was significantly below its overall market share for home refinance loans. The bank's market share in moderate-income census tracts was near to its overall market share for home refinance loans. The bank's performance in 2013 was not inconsistent with the performance noted in 2014 through 2015, and was poor.

### **Terre Haute MSA**

Overall, the geographic distribution of home mortgage loans is adequate.

The overall geographic distribution of home purchase loans is excellent when considering market share performance. The percentage of loans made in low-income geographies was below the percentage of owner-occupied units in these geographies. However, the percentage of loans made in moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank's market share in low-income census tracts exceeded its overall market share for home purchase loans. The bank's market share in moderate-income census tracts exceeded its overall market share for home purchase loans.

The overall geographic distribution of home improvement loans is good when considering market share performance. The percentage of loans made in low-income geographies approximated the percentage of owner-occupied units in these geographies. The percentage of loans made in moderate-income geographies also approximated the percentage of owner-occupied units in these geographies. The bank's market share in low-income census tracts was well below its overall market share for home improvement loans. The bank's market share in moderate-income census tracts was near to its overall market share for home improvement loans.

The overall geographic distribution of home refinance loans is adequate when considering market share performance. The percentage of loans made in low-income geographies was significantly below the percentage of owner-occupied units in these geographies. The percentage of loans made in moderate-income geographies was below the percentage of owner-occupied units in these geographies. However, the bank's market share in low- and moderate-income census tracts was near to and exceeded its overall market share for home refinance loans, respectively.

### ***Small Loans to Businesses***

The overall geographic distribution for small loans to business is excellent. The geographic distribution in Indianapolis-Carmel-Anderson MSA is excellent and Terre Haute MSA is good.

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.

### **Indianapolis-Carmel-Anderson MSA**

The overall geographic distribution for small loans to businesses is excellent. The geographic distribution of small loans to businesses in 2014 through 2015 was excellent. The percentage of loans made in low-income geographies exceeded the percentage of businesses in those geographies. The percentage of loans made in moderate-income geographies approximated the percentage of businesses in those geographies. The bank's market share in low-income geographies exceeded its overall market share for small loans to businesses. The bank's market share in moderate-income geographies exceeded its overall market share for small loans to businesses. The bank's performance in 2013 was not inconsistent with the performance noted in 2014 through 2015, and was excellent.

### **Terre Haute MSA**

The overall geographic distribution for small loans to businesses is good. The percentage of loans made in low-income geographies exceeded the percentage of businesses in those geographies. The percentage of loans made in moderate-income geographies was near to the percentage of businesses in those geographies. The bank's market share in low-income geographies exceeded its overall market share for

small loans to businesses. The bank's market share in moderate-income geographies was near to its overall market share for small loans to businesses.

### ***Small Loans to Farms***

The overall geographic distribution for small loans to farms is poor.

Refer to Table 7 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/purchase of small loans to farms.

### **Indianapolis-Carmel-Anderson MSA**

The bank did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis during the entire evaluation period.

### **Terre Haute MSA**

The overall geographic distribution for small loans to farms is adequate. The bank did not originate or purchase any small loans to farms in low- or moderate-income geographies. However, with a total of only 361 farms in the AA, with only seven farms in low-income geographies and 18 farms in moderate-income geographies, there are very limited opportunities for the bank to originate or purchase small loans to farms.

### ***Lending Gap Analysis***

We evaluated the lending distribution in the Indianapolis-Carmel-Anderson MSA and Terre Haute MSA to determine if any unexplained, conspicuous gaps existed. We used basic dot density maps and other reports on HMDA and CRA loan data to compare the geographies where loans were made to the geographies in the AA. We also considered competition, market conditions, and demographic information. No unexplained, conspicuous gaps were identified.

## **Distribution of Loans by Income Level of the Borrower**

### ***Home Mortgage Loans***

The bank's overall borrower distribution of loans by income level is good. The borrower distribution in Indianapolis-Carmel-Anderson MSA is excellent and in the Terre Haute MSA is good.

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.

### **Indianapolis-Carmel-Anderson MSA**

The overall borrower distribution in Indianapolis-Carmel-Anderson MSA is excellent.

The overall borrower distribution of home purchase loans is excellent. The overall borrower distribution performance in 2014 through 2015 was excellent. The percentage of loans to low-income borrowers was near to the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share to low-

income borrowers exceeded its overall market share for home purchase loans. The bank's market share to moderate-income borrowers was near to its overall market share for home purchase loans. The bank's performance in 2013 was not inconsistent with the performance noted in 2014 through 2015, and was excellent.

The overall borrower distribution of home improvement loans is excellent. The overall borrower distribution performance in 2014 through 2015 was excellent. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share to low-income borrowers exceeded its overall market share for home improvement loans. The bank's market share to moderate-income borrowers exceeded its overall market share for home improvement loans. The bank's performance in 2013 was not inconsistent with the excellent performance noted in 2014 through 2015.

The overall borrower distribution of home refinance loans is adequate. The overall borrower distribution performance in 2014 through 2015 was adequate. The percentage of loans to low-income borrowers was well below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share to low-income borrowers was well below its overall market share for home refinance loans. The bank's market share to moderate-income borrowers exceeded its overall market share for home refinance loans. The bank's performance in 2013 was stronger than performance noted in 2014 through 2015, and was good, due to stronger low-income market share performance. This performance was not significant enough to impact the overall home refinance conclusion.

### **Terre Haute MSA**

The overall borrower distribution in Terre Haute MSA is good.

The overall borrower distribution of home purchase loans is good, when considering a relatively high households below poverty rate of 18 percent, and that housing is generally unaffordable to low-income borrowers. Please see the market profile in appendix C for more information. The percentage of loans to low-income borrowers was well below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank did not achieve a market share in low-income geographies. The bank's market share to moderate-income borrowers exceeded its overall market share for home purchase loans.

The overall borrower distribution of home improvement loans is good. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share to low-income borrowers was near to its overall market share for home improvement loans. The bank's market share to moderate-income borrowers was near to its overall market share for home improvement loans.

The overall borrower distribution of home refinance loans is good, when considering a relatively high households below poverty rate of 18 percent, and that housing is generally unaffordable to low-income borrowers. Please see the market profile in appendix C for more information. The percentage of loans to low-income borrowers was well below the percentage of low-income families. The percentage of loans to moderate-income borrowers was somewhat near to the percentage of moderate-income families.

The bank's market share to low-income borrowers was below its overall market share for home refinance loans. The bank's market share to moderate-income borrowers exceeded its overall market share for home refinance loans.

### ***Small Loans to Businesses***

The overall borrower distribution for small loans to businesses is adequate.

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.

### **Indianapolis-Carmel-Anderson MSA**

The overall borrower distribution to small loans to businesses is adequate. The borrower distribution in 2014 through 2015 was adequate when considering market share performance. The percentage of small loans made to small businesses (businesses with gross annual revenue of \$1 million or less) was below the percentage of small businesses in those geographies. However, the bank's market share of small loans to small businesses exceeded its overall market share for small loans to small businesses. The bank's performance in 2013 was stronger than the performance noted in 2014-2015, and was good. This was due to stronger bank to demographic performance. This performance was not significant enough to impact the overall conclusion.

### **Terre Haute MSA**

The overall borrower distribution to small loans to businesses is good when considering market share performance. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was below the percentage of small businesses in those geographies. However, the bank's market share of small loans to small businesses exceeded its overall market share for small loans to businesses.

### ***Small Loans to Farms***

The overall distribution of small farm loans is poor.

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/purchase of small loans to farms.

### **Indianapolis-Carmel-Anderson MSA**

The bank did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

### **Terre Haute MSA**

The overall borrower distribution for small loans to small farms is adequate. The percentage of small loans to small farms (farms with gross annual revenue of \$1 million or less) was below the percentage of farms in those geographies. The bank's market share of small loans to small farms was near to its overall market share for 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 community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes borrower lending data on all multifamily loans, including those that also qualify as community development loans. However, table 5 does not separately list community development loans.

### **Indianapolis-Carmel-Anderson MSA**

CD lending was exceptionally strong, and had a significantly positive impact on the lending performance in the Indianapolis-Carmel-Anderson MSA AA. This performance compensated for overall good retail lending performance. CD lending was responsive to the AA's affordable housing needs and had a relatively high level impact on the lending performance in the state of Indiana. During the evaluation period, the bank originated 15 CD loans totaling \$39.84 million, or 38.77 percent of Tier 1 capital allocated to the AA.

Specific examples of the CD loans originated during this evaluation period include:

- Four loans totaling \$6.3 million to provide affordable housing. The loans were made in partnership with Indianapolis Neighborhood Housing Partnership to support mortgage financing for low-income families in the AA.
- A \$6 million loan to provide affordable housing. Loan proceeds will be used to build an additional 22 units to an existing section 8 complex in the AA.

### **Terre Haute MSA**

CD lending had a positive impact on lending performance in the Terre Haute MSA AA. The bank's CD lending was responsive to the AA's identified needs. During the evaluation period, the bank originated two CD loans totaling \$5.07 million, or 13.42 percent of Tier 1 capital allocated to the AA. For example, ONB originated a \$4 million loan to support a corporation's transition of manufacturing operations from overseas to the AA. The move will create jobs to 80 employees, which are LMI individuals, which will provide economic development.

## **Product Innovation and Flexibility**

Flexible and innovative loan programs had a neutral impact on the bank's lending performance in the Indianapolis-Carmel-Anderson MSA or Terre Haute MSA. Refer to the Other Performance Data – section in the overall Scope of Evaluation section for additional information.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, performance in the Bloomington MSA, Lafayette MSA, and Muncie MSA is not inconsistent with the bank's overall High Satisfactory performance in the state. Performance in the Indiana Non-MSA AA was stronger than the overall performance in the state, due to stronger borrower income and CD loan performance. Performance in the Columbus MSA and Elkhart MSA was weaker than overall performance in the state, due to weaker CD loan performance.

Performance in the Ft. Wayne MSA was weaker than overall performance in the state, due to weaker geographic distribution performance. Performance in the Anderson MSA was weaker than overall performance in the state, due to weaker geographic distribution and CD loan performance. Finally, performance in the South Bend MSA was weaker than overall performance in the state, due to weaker borrower income distribution and CD loan performance. The combined limited-scope area performance was significant enough to have a negative impact on the Lending Test performance in the state. Refer to Tables 1 through 13 in the state of Indiana section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the investment test in the state of Indiana is Outstanding. Based on the full-scope review, the bank's performance in the Indianapolis-Carmel, IN MSA is excellent and good in the Terre Haute IN MSA. The combined limited-scope area performance further supports the Outstanding rating in the state.

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.

#### **Indianapolis-Carmel-Anderson MSA**

Current period investments in the AA total \$22.6 million that directly and positively affect the AA. ONB invested \$8.9 million in CRA qualifying mortgage backed securities backed by single-family and multifamily mortgages. While not innovative, these investments provide ongoing responsiveness to affordable housing needs in the community. ONB made \$12.6 million in municipal school bond investments financing physical plant improvements in public schools with rates of free and reduced lunch in excess of 50 percent. The bank also invested in many community organizations with 139 grants totaling \$1.1 million that primarily support community services and affordable housing to low- and moderate-income families, as well as economic development to support small business development. ONB exhibited excellent responsiveness to the community development investment needs of the Indianapolis-Carmel, IN MSA.

We gave consideration for a qualified broader statewide or regional area LIHTC investment of \$353,000 made during the evaluation period.

To provide perspective regarding the relative level of qualified community development investments, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The dollar amount of the current and prior period investments represents 21.94 percent of the allocated portion of the bank's Tier One Capital in the Indianapolis-Carmel, IN MSA.

#### **Terre Haute MSA**

Current period investments total \$3 million that directly and positively affect the AA. ONB invested \$2.9 million in CRA qualifying mortgage backed securities backed by single-family and multifamily mortgages. While not innovative, these investments provide ongoing responsiveness to affordable

housing needs in the community. The bank also invested in several community organizations with 26 grants totaling \$100 thousand that primarily support community services to low- and moderate-income families and economic development in support of small business development. ONB exhibited good responsiveness to the community development investment needs in the Terre Haute IN MSA.

To provide perspective regarding the relative level of qualified community development investments, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The dollar amount of the current and prior period investments represents 7.83 percent of the allocated portion of the bank's Tier One Capital in the Terre Haute IN MSA.

### **Conclusions for Areas Receiving Statewide or Regional Reviews**

We gave consideration for a qualified LIHTC investment of \$353,000 made during the evaluation period and undertaken in a statewide area that includes three of the bank's assessment areas. The purpose of the investment was to finance the development of supportive housing for low- and moderate-income individuals.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the investment test in the Indiana Non MSA, Columbus IN MSA, Elkhart-Goshen IN MSA, Fort Wayne IN MSA, Muncie IN MSA, and South Bend-Mishawaka IN MSA AAs is not inconsistent with the bank's overall Outstanding performance under the investment test in the state of Indiana. The performance in the Bloomington IN MSA, Lafayette-West Lafayette IN MSA, and Anderson IN MSA AAs is weaker than the bank's overall outstanding performance under the investment test for the state of Indiana, due to the level of investments. The combined investment test performance in the limited-scope areas further supports the bank's overall Outstanding investment test rating for the state of Indiana. Refer to 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 High Satisfactory. Based on the full-scope review, the bank's performance in the Indianapolis-Carmel-Anderson MSA is poor and in the Terre Haute MSA is excellent. Combined performance in the limited-scope areas contributed to the service test rating.

### **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.

### **Indianapolis-Carmel-Anderson MSA**

ONB's branches are reasonably accessible to all portions of the bank's AA. The bank operates 25 full service branch offices in the Indianapolis-Carmel-Anderson MSA AA. The bank does not have any

branches in low-income geographies. ONB has seven branches in moderate-income geographies. The bank's distribution of branches in moderate-income geographies exceeds the percentage of the population living within moderate-income geographies.

The bank's record of opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. ONB opened one branch in the AA in a moderate-income geography. The bank closed 18 branches in the AA, one of which was in a low-income geography and seven in a moderate-income geography. The closed branches were located inside several retail stores including Kroger stores, Starbucks, Marsh stores, and Walmart stores. Other ONB branches were in close proximity.

Banking hours and services do not vary in a way that negatively affects low- and moderate-income geographies or low- and moderate-income individuals and provide reasonable accommodation to the bank's entire AA. The services offered and hours of operation are comparable among locations regardless of income level of the geography. The bank offers a wide range of traditional deposit and banking products.

ONB makes adequate use of alternative delivery systems through telephone and on-line banking, electronic bill pay, and mobile banking options. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

### **Terre Haute MSA**

ONB's branches are readily accessible to all portions of the AA when considering the bank's relatively limited presence. The bank operates 6 full-service branch offices in the Terre Haute MSA. ONB has one branch located in a low-income geography. The bank has three branches in moderate-income geographies. The percentage of branches in low- and moderate-income geographies exceeds the percentage of the population living within low- and moderate-income geographies.

ONB did not open or close branches in the AA during the evaluation period.

Banking hours and services do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income individuals or geographies. The services offered and hours of operation are comparable among locations regardless of income level of the geography. ONB makes adequate use of alternative delivery systems through ATMs, telephone and on-line banking, electronic bill pay, and mobile banking options. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

### **Community Development Services**

The bank's level of community development services in the Indianapolis-Carmel, IN MSA and Terre Haute MSA is good.

**Indianapolis-Carmel-Anderson MSA**

ONB's community development services primarily focused on providing financial literacy education and training to the clients of community development organizations within the AA. The bank recorded over 550 participants in ONB's financial education sessions at various local community and nonprofit organizations that were targeted to low- and moderate-income individuals. These classes provided instruction primarily on basic banking functions. In addition, the bank provided instruction on financial literacy to over 500 school-age children through 20 bank employee led sessions.

Local ONB management members were actively involved in providing leadership to over 10 different community organizations to entities that have community development as their primary purpose. During the evaluation period, ONB employees recorded over 1,500 hours of qualified community development service. Bank personnel reported 440 service hours serving on the Board of Directors of organizations and 1,162 service hours using their financial expertise to provide technical assistance to qualified organizations. These organizations work to create affordable housing, provide healthcare to low- and moderate-income families, provide education and after school care to children of low- and moderate-income parents, and revitalize low- and moderate-income geographies.

**Terre Haute MSA**

The bank focused on providing financial literacy education and training to low- and moderate-income residents. The bank provided instruction on financial literacy through the Junior Achievement program to over 1,500 LMI school-aged children at seven Vigo County schools through 65 bank employee led sessions. The bank provided instruction on basic age-appropriate financial and banking functions.

Local ONB management members were actively involved in providing leadership to over 10 different community organizations to entities that have community development as their primary purpose. During the evaluation period, ONB employees recorded over 1,000 hours of qualified community development service. Bank personnel reported 414 service hours serving on the Board of Directors of organizations and 711 service hours using their financial expertise to provide technical assistance to qualified organizations. These organizations work to create affordable housing, provide healthcare and basic needs to low- and moderate-income families, provide education and after school care to children of low- and moderate-income parents, and revitalize low- and moderate-income geographies.

**Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the service test in the Bloomington MSA and the IN Non MSA, is equal to the bank's overall performance in the state. The bank's performance under the service test in the Columbus MSA, Elkhart-Goshen MSA and Lafayette MSA was stronger than its overall performance in the state due to excellent branch distribution. Performance in the Columbus MSA, Fort Wayne MSA, Muncie MSA, and South Bend-Mishawaka was stronger than its overall performance in the state and was good. The performance is weaker than the bank's overall performance in the state of Indiana. The performance differences were due to branch distribution.

The combined performance in the limited-scope areas had a significant impact on the bank's overall service test performance rating for the state of Indiana.

Service test performance in the Anderson MSA was not analyzed due to the AA only being in existence for one year at the beginning of the evaluation period.

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

## State Rating

### State of Kentucky

<b>CRA Rating for Kentucky<sup>4</sup>:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	<b>Needs to Improve</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>High Satisfactory</b>

The major factors that support this rating include:

- The geographic distribution of loans reflects poor penetration among geographies of different income levels. Very poor home mortgage performance was augmented by good small loans to businesses performance;
- Overall adequate borrower income distribution of loans, with adequate penetration among home mortgage borrowers of different income levels, and good penetration among businesses of different revenue sizes;
- ONB's level of qualified investment performance is excellent; and
- ONB's branch distribution is good and the level of community development services is excellent.

### Description of Bank's Operations in Kentucky

Old National Bank has three AAs within the State of Kentucky. These AAs include the Owensboro MSA and the Kentucky Non-MSA. The non-MSA AAs includes two contiguous counties, Muhlenberg and Hopkins, located in the southern region of Kentucky. The Union County AA is near the Indiana state border. These non-metropolitan areas were combined for analysis purposes.

Based on the FDIC Summary of Deposit information as of June 30, 2015, the bank had \$428.4 million in deposits in the state of Kentucky, which represented 4.83 percent of the bank's total deposits. The bank has nine branch locations and three deposit-taking ATMs within the state. The branch distribution represented 5.56 percent of the bank's total branch network.

### Scope of Evaluation in Kentucky

For the state of Kentucky, the Kentucky Non-MSA was selected for a full-scope review, and the Owensboro MSA received a limited-scope review. The Kentucky Non-MSA received a full-scope review due to the high percentage of reportable loans (67 percent) and branches (55 percent). The bank achieved a 26.21 percent market share of deposits, ranking second among 14 banks in the AA. Primary competitors include US Bank NA, Fifth Third Bank, First United Bank and Trust Company, United

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<sup>4</sup> For banks 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 bank's performance in that area.

Community Bank of West Kentucky, and First National Bank of Muhlenberg County. 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.

The ratings primarily are based on the results of full-scope areas. When performing the Lending Test analysis, the bank did not originate or purchase a sufficient volume of small loans to farms in the Owensboro MSA to perform a meaningful analysis. Refer to the table in Appendix A for more 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 Kentucky Non-MSA is adequate.

### **Lending Activity**

The bank's overall lending activity is good, considering the strong competition for all types of loans in AA. The bank's lending activity for home mortgage lending activity is good, small business lending activity is good, and small farm lending is good.

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.

Based upon FDIC Deposit Market Share data as of June 30, 2015, ONB achieved a 26.21 percent market share of deposits, ranking second among 14 financial institutions in the AA, and ranking them in the top 14.3 percent of total depository banks.

Based upon 2015 Peer Mortgage Data, the bank achieved a 3.05 percent market share of home purchase loans, ranking 12<sup>th</sup> among 88 reporting lenders and is equivalent to being in the top 13.64 percent of lenders. In addition, the top five home purchase lenders collectively had 34.91 percent of the total market share. The bank achieved a 53.16 percent market share of home improvement loans, ranking first among 21 reporting lenders. The bank also achieved a 10.41 percent market share of home refinance loans, ranking second among 79 reporting lenders and is equivalent to being in the top 2.53 percent of lenders.

Based upon 2015 Peer CRA Data, the bank achieved a 12.13 percent market share of small loans to businesses, ranking fourth among 37 reporting lenders, or the top 10.81 percent of lenders. The top five lenders for small business lending consisted of the nation's largest credit card lenders, which collectively had 65.29 percent of the market share. The bank achieved a 22.09 percent market share for lending to small farms, ranking second among reporting lenders, or the top 12 percent of lenders. The top five lenders for small farms consisted of the nation's largest banks and collectively had 89.58 percent of the market share.

## **Distribution of Loans by Income Level of the Geography**

The bank's overall lending activity is adequate for all types of loans in AA.

### ***Home Mortgage Loans***

The overall geographic distribution for home mortgage loans is very poor. In evaluating the geographic distribution of home loans in the AA, it is important to note that under the 2010 U.S. Census, there were no low-income census tracts in the AA during the evaluation period. Refer to Tables 2, 3, 4, and 5 in the 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.

The bank's geographic distribution of home purchase loans is adequate when considering market share performance. The percentage of loans made in moderate-income geographies was near to the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income census tracts was significantly below its overall market share for home purchase loans.

The bank's geographic distribution of home improvement loans is good. The percentage of loans made in moderate-income geographies was near to the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income census tracts was below its overall market share for home improvement loans.

The bank's geographic distribution of home refinance loans is very poor. The percentage of loans made in moderate-income geographies was significantly below the percentage of owner-occupied units in these geographies. The bank did not achieve a market share in moderate-income census tracts.

### ***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. In evaluating the geographic distribution of home loans in the AA, it is important to note that under the 2010 U.S. Census, there were no low-income census tracts in the AA during the evaluation period.

The overall geographic distribution of small loans to businesses is good when considering the relatively limited opportunities to lend in moderate-income geographies. According to business demographic data included in appendix C, only 880 businesses were located in the moderate-income geographies. This illustrates the limited opportunities to make small loans to businesses in moderate-income geographies. The percentage of loans made in moderate-income geographies was below the percentage of businesses in those geographies. The bank's market share in moderate-income geographies was near to its overall market share for small loans to businesses and was adequate.

### ***Small Loans to Farms***

Refer to Table 7 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/purchase of small loans to farms. In evaluating the geographic distribution of home loans in the AA, it is important to note that under the 2010 U.S. Census, there were no low-income census tracts in the AA during the evaluation period.

The overall geographic distribution for small loans to farms is good when considering the very limited opportunities to lend in moderate-income geographies. According to business demographic data included in appendix C, only 13 farms were located in the moderate-income geographies. This illustrates the very limited opportunities to make small loans to farms in moderate-income geographies. The percentage of loans made in moderate-income geographies was near to the percentage of businesses in those geographies. The bank's market share in moderate-income geographies was well below its overall market share for small loans to businesses.

### ***Lending Gap Analysis***

We evaluated the lending distribution in the Kentucky Non-MSA AA to determine if any unexplained, conspicuous gaps existed. We used basic dot density maps and other reports on HMDA and CRA loan data to compare the geographies where loans were made to the geographies in the AA. We also considered competition, market conditions, and demographic information. No unexplained, conspicuous gaps were identified.

### **Distribution of Loans by Income Level of the Borrower**

The bank's overall borrower distribution of loans by income level is adequate. The bank's borrower distribution of home mortgage loans is adequate, and small business loans is good.

#### ***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.

The overall borrower distribution of home purchase loans is adequate. The percentage of loans to low-income borrowers was well below the percentage of low-income families. The percentage of loans to moderate-income borrowers approximated the percentage of moderate-income families. The bank's market share to low-income borrowers exceeded its overall market share for home purchase loans. The bank's market share to moderate-income borrowers was significantly below its overall market share for home purchase loans.

The overall borrower distribution of home improvement loans is good. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share to low-income borrowers was near to its overall market share for home improvement loans. The bank's market share to moderate-income borrowers exceeded its overall market share for home improvement loans.

The overall borrower distribution of home refinance loans is adequate when considering market share performance. The percentage of loans to low-income borrowers was well below the percentage of low-income families. The percentage of loans to moderate-income borrowers was below the percentage of moderate-income families. The bank's market share to low-income borrowers was below its overall market share for home refinance loans. The bank's market share to moderate-income borrowers exceeded its overall market share for home refinance loans.

***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 overall borrower distribution for small loans to businesses is good when considering market share performance. The percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) was below the percentage of small businesses. However, the bank's market share of small loans to small businesses exceeded its overall market share for small loans to businesses.

***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/purchase of small loans to farms.

The overall borrower distribution for small loans to farms is good when considering market share performance. The percentage of small loans to small farms (farms with gross annual revenues of \$1 million or less) was below the percentage of small farms. However, the bank's market share of small loans to small farms exceeded its overall market share for 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 community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes borrower lending data on all multifamily loans, including those that also qualify as community development loans. However, table 5 does not separately list community development loans.

Community development lending had a neutral impact on the overall lending performance in the Kentucky Non-MSA AA. During the evaluation period, the bank originated one CD loan totaling \$1 million, or 2.43 percent of Tier 1 capital allocated to the AA.

**Product Innovation and Flexibility**

Flexible and innovative loan programs had a neutral impact on the bank's lending performance in the Kentucky Non-MSA AA. Refer to the Other Performance Data – section in the overall Scope of Evaluation section for additional information.

**Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the lending test in the Owensboro MSA is stronger than the bank's overall Low Satisfactory rating in the state. The stronger performance is due to stronger geographic distribution and CD loan performance. This performance was not significant enough to impact the overall Lending Test performance in the state. Refer to the Tables 1 through 13 in the state of Kentucky section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the investment test in the state of Kentucky is Outstanding. Based on the full-scope review, the bank's performance in the Kentucky Non MSA is excellent.

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.

Current period investments total \$3.5 million that directly and positively affect the AA. ONB invested \$3.3 million in Housing Finance Agency affordable housing bonds backed by CRA qualifying single-family mortgages. While not innovative, these investments provide ongoing responsiveness to affordable housing needs in the community. The bank also invested in community organizations with 37 grants totaling \$149 thousand that primarily support community services for low- and moderate-income families and economic development in support small business development. ONB exhibited good responsiveness to the community development investment needs of the Kentucky Non MSA. Community development needs include access to affordable housing, workforce development, small business and micro-business finance, financial literacy, and community services to low- and moderate-income individuals.

To provide perspective regarding the relative level of qualified community development investments, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The dollar amount of the current and prior period investments represents 8.44 percent of the allocated portion of the bank's Tier One Capital in the Kentucky Non MSA.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on the limited-scope review, the bank's performance under the investment test in the Owensboro, KY MSA was weaker than the bank's overall Outstanding performance under the investment test in the state of Kentucky, due to a lower level of investments. This performance was not significant enough to have an impact on the bank's overall investment test rating for the state of 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 High Satisfactory. Based on the full-scope review, the bank's performance in the Kentucky Non-MSA is good.

### **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 branch distribution is good when considering the bank's relatively limited presence in the AA. The bank operates 5 full-service branch offices in the KY Non MSA. There are no low-income geographies, and the bank has one branch located in a moderate-income geography.

The bank's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, ONB closed one branch in a middle-income geography. The closure was due to a reduction of banking activity in the AA.

The bank's hours and services do not vary in any way that inconveniences the AA, particularly low- and moderate-income individuals or low- and moderate-income geographies. The services offered and hours of operation are comparable among locations regardless of the income level of the geography.

The bank makes adequate use of alternative delivery systems through ATMs, telephone and on-line banking, electronic bill pay, and mobile banking options. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of LMI individuals.

### **Community Development Services**

ONB's performance in providing community development services in the KY Non MSA is excellent. The bank provided instruction on financial literacy through the Junior Achievement program to over 646 LMI school-aged children at six schools through 30 bank employee led sessions. The bank provided instruction on basic age-appropriate financial and banking functions.

Local ONB management members were actively involved in providing leadership to over eight different community organizations to entities that have community development as their primary purpose. During the evaluation period, ONB employees recorded over 1,500 hours of qualified community development service. Bank personnel reported 440 service hours serving on the Board of Directors of organizations and 1,162 service hours using their financial expertise to provide technical assistance to qualified organizations. These organizations work to create affordable housing, provide healthcare to low- and moderate-income families, provide education and after school care to children of low- and moderate-income parents, and revitalize low- and moderate-income geographies.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the service test in the Owensboro MSA was not inconsistent with the bank's overall high satisfactory performance under the service test in Kentucky. Refer to Table 15 in the state of Kentucky section of Appendix D for the facts and data that support these conclusions.

## State Rating

### State of Michigan

<b>CRA Rating for Michigan:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	<b>Low Satisfactory</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>Outstanding</b>

The major factors that support this rating include:

- The geographic distribution of loans reflects adequate penetration among geographies of different income levels. Very poor distribution of home mortgage loans was augmented by excellent small loans to businesses distribution;
- Overall, the distribution of loans by borrower income is good, with good penetration among home mortgage borrowers of different income levels and businesses of different revenue sizes;
- ONB originated a high level of community development loans reflecting excellent responsiveness to identified needs;
- ONB's qualified investment performance is excellent; and
- ONB's branch distribution is excellent.

### Description of Bank's Operations in Michigan

Old National Bank has 10 AAs within the State of Michigan. These AAs include the Ann Arbor MSA, Battle Creek MSA, Grand Rapids-Wyoming MSA, Jackson MSA, Kalamazoo-Portage MSA, Monroe MSA, Niles-Benton Harbor MSA, Warren-Troy-Farmington Hills MD, and two non-contiguous non-MSA AAs in the state. The non-MSA area includes the counties of St. Joseph and Lenawee. These non-metropolitan areas were combined for analysis purposes. The AAs consist of whole MSAs or counties.

All of the AAs in the State of Michigan were formed during the evaluation period as a result of several acquisitions. Details of these acquisitions are as follows:

- The Battle Creek MSA, Jackson MSA, Kalamazoo-Portage MSA, and Niles-Benton Harbor MSA AAs along with the St. Joseph non-MSA county were added in 2013 with the acquisition of Bank of America branches.
- The Ann Arbor MSA, Monroe MSA, and Warren-Troy-Farmington Hills MD AAs along with the Lenawee non-MSA county were added in 2014 with the United Bank and Trust acquisition.
- The Grand Rapids-Wyoming MSA AA was added in 2015 with the Founders Bank and Trust acquisition.

Based on the FDIC Summary of Deposit information as of June 30, 2015, the bank had \$1.33 billion in deposits in the state of Michigan, which represents 15.03 percent of the bank's total deposits. The bank has 36 branch locations and 32 deposit-taking ATMs within the state. The branch distribution represented 22.22 percent of the bank's total branch network.

## **Battle Creek MSA**

The bank achieved a 6.45 percent market share of deposits, ranking sixth among 31 banks in the AA. Primary competitors include Chemical Bank, Comerica Bank, Fifth Third Bank, Southern Michigan Bank & Trust, and PNC Bank NA. Refer to the market profiles for the state of Michigan in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

## **Scope of Evaluation in Michigan**

For the state of Michigan, we performed a full-scope review of the Battle Creek MSA AA. When performing the Lending Test analysis, the bank did not originate or purchase a sufficient volume of home purchase loans in the Battle Creek MSA, Jackson MSA, or Niles MSA to perform a meaningful analysis. Similarly, the bank did not originate or purchase a sufficient volume of home improvement loans in the Battle Creek MSA, Grand Rapids MSA, Monroe MSA, Niles MSA, or Warren MD to perform a meaningful analysis. The bank did not originate or purchase a sufficient volume of small loans to businesses in the Niles MSA to perform a meaningful analysis. Finally, the bank did not originate or purchase a sufficient volume of small loans to farms in any AA in the state to perform a meaningful analysis. The Ann Arbor MSA, Grand Rapids-Wyoming MSA, Jackson MSA, Kalamazoo-Portage MSA, Monroe MSA, Niles-Benton Harbor MSA, Warren-Troy-Farmington Hills MD, and the Michigan Non-MSA AAs received a limited-scope review. The ratings primarily are based on the results of full-scope area. Refer to the table in Appendix A for more information.

## **LENDING TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the lending test in Michigan is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Battle Creek MSA is good. The combined performance in the limited-scope area further supports the Lending Test rating in the state.

### **Lending Activity**

The bank's overall lending activity is good for all types of loans in AA. The bank's lending activity for home mortgage lending is excellent, and small business lending activity is adequate.

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

Based upon FDIC Deposit Market Share data as of June 30, 2015, ONB achieved a 6.45 percent market share of deposits, ranking sixth among 31 financial institutions in the AA, and ranking them in the top 19.4 percent of total depository banks.

Based upon 2015 Peer Mortgage Data, the bank achieved a 0.12 percent market share of home purchase loans, ranking 75<sup>th</sup> among 127 reporting lenders and is equivalent to being in the top 59.06 percent of lenders. In addition, the top five home purchase lenders collectively had 42.80 percent of the total market share. The bank achieved a 2.38 percent market share of home improvement loans, ranking 11th

among 42 reporting lenders and is equivalent to being in the top 26.19 percent of lenders. The top five home improvement lenders collectively had 62.24 percent of the total market share. The bank also achieved a 0.91 percent market share of home refinance loans, ranking 24<sup>th</sup> among 131 reporting lenders and is equivalent to being in the top 18.32 percent of lenders. For home refinance loans, the top five lenders collectively had 43.53 percent of the total market share.

Based upon 2015 Peer CRA Data, the bank achieved a 1.19 percent market share of small loans to businesses, ranking 15<sup>th</sup> among 39 reporting lenders, or the top 38.46 percent of lenders. The top five lenders for small business lending consisted of the nation's largest credit card lenders, which collectively had 65.29 percent of the market share.

## **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution is adequate.

### ***Home Mortgage Loans***

The overall geographic distribution for home mortgage loans is poor.

Refer to Tables 2, 3, 4, and 5 in the Michigan 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.

The bank did not originate or purchase a sufficient volume of home purchase loans or home improvement loans to perform a meaningful analysis.

The bank's geographic distribution of home refinance loans is poor when considering market share performance. The percentage of loans made in both low- and moderate-income geographies was significantly below the percentage of owner-occupied units in those geographies. However, the bank's market share in both low- and moderate-income geographies exceeded the overall home refinance market share.

### ***Small Loans to Businesses***

Refer to Table 6 in the state of Michigan 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 overall geographic distribution for small loans to businesses is excellent when considering the limited opportunities to lend in low-income geographies. According to business demographic data included in appendix C, only 622 businesses were located in the low-income geographies. This illustrated the limited opportunities to make small loans to businesses in low-income geographies. Despite this, the percentage of loans made in low-income geographies exceeded the percentage of businesses in those geographies. The percentage of loans made in moderate-income geographies exceeded the percentage of businesses in those geographies. The bank's market share in low-income geographies was well below its overall market share for small loans to businesses. The bank's market share in moderate-income geographies exceeded its overall market share for small loans to businesses.

### ***Lending Gap Analysis***

We evaluated the lending distribution in the Battle Creek MSA to determine if any unexplained, conspicuous gaps existed. We used basic dot density maps and other reports on HMDA and CRA loan data to compare the geographies where loans were made to the geographies in the AA. We also considered competition, market conditions, and demographic information. No unexplained, conspicuous gaps were identified.

### **Distribution of Loans by Income Level of the Borrower**

The bank's overall borrower distribution of loans by income level is good. The bank's borrower distribution of home mortgage loans is good, and small business loans is good.

#### ***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in the state of Michigan 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.

The bank did not originate or purchase a sufficient volume of home purchase loans or home improvement loans to perform a meaningful analysis.

The overall borrower distribution of home refinance loans is good, when considering that housing is generally unaffordable to low-income borrowers. Please see the market profile in appendix C for more information. The percentage of loans to low-income families was considered good. The percentage of loans to moderate-income borrowers was near to the percentage of moderate-income families. The bank did not achieve a market share to low-income borrowers. The bank's market share to moderate-income borrowers was near to its overall market share for home refinance loans.

#### ***Small Loans to Businesses***

Refer to Table 11 in the state of Michigan 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 overall borrower distribution of small loans to businesses is good when considering market share performance. The percentage of small loans made to small businesses (businesses with gross annual revenues of \$1 million or less) was below the percentage of small businesses in those geographies. However, the bank's market share of small loans to small businesses exceeded its overall market share for small loans to businesses.

### **Community Development Lending**

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

CD lending is excellent and had a significant, positive impact on lending performance in the AA. During the evaluation period, the bank originated a \$4.1 million CD loan, or 60.02 percent of Tier 1 capital allocated to the AA. The refinance loan supported the development of an affordable manufactured housing community located in a moderate-income census tract in the AA. This housing community provided 343 mobile homes affordable to LMI families. The loan reflects excellent responsiveness to the need for affordable housing for LMI families in the AA.

## **Product Innovation and Flexibility**

Flexible and innovative loan programs had a neutral impact on the bank's lending performance in the Battle Creek MSA. Refer to the Other Performance Data – section in the overall Scope of Evaluation section for additional information.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Grand Rapids-Wyoming MSA, Jackson MSA, Monroe MSA, and Warren-Troy-Farmington Hills MD is not inconsistent with the Low Satisfactory performance in the state. Performance in the Kalamazoo-Portage MSA and Niles-Benton Harbor MSA is stronger than the bank's performance in the state, due to stronger geographic distribution and CD loan performance. Performance in the Ann Arbor MSA and MI Non-MSA is weaker, due to weaker borrower income distribution and CD loan performance. The combined performance in the limited-scope areas was significant enough to negatively impact the overall Lending Test rating in the state.

Refer to the Tables 1 through 13 in the state of Michigan section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the investment test in the state of Michigan is Outstanding. Based on the full-scope review, the bank's performance in the Battle Creek MSA is good. Combined performance in the limited-scope areas had a significantly positive impact on the investment test rating in the state.

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

Current period investments in the AA total \$456 thousand in CRA qualifying mortgage backed securities that directly and positively affect the AA. While not innovative, these investments provide ongoing responsiveness to affordable housing needs in the community. The bank also invested in a community organization with one grant totaling \$2,500 supporting community services for low- and moderate-income families. ONB exhibited adequate responsiveness to the community development investment needs of the Battle Creek MSA.

We gave positive consideration for qualified broader statewide or regional area investments of \$7.4 million made during the evaluation period. ONB invested \$5.1 million to provide growth capital in the form of subordinated debt to small businesses statewide. The bank was also given consideration for two

qualified LIHTC investments totaling \$2.3 million financing the development of affordable housing for low- and moderate-income individuals.

To provide perspective regarding the relative level of qualified community development investments, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The dollar amount of the current and prior period investments represents 6.68 percent of the allocated portion of the bank's Tier One Capital in the Battle Creek MSA.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the investment test in the Ann Arbor MI MSA, Grand Rapids-Wyoming MI MSA, Jackson MI MSA, Kalamazoo-Portage MI MSA, Monroe MI MSA, Niles-Benton Harbor MI MSA, and Warren-Troy-Farmington Hills MI MSA is not inconsistent with the bank's overall Outstanding performance under the investment test in the state of Michigan. Performance in the Michigan Non-MSA AA is weaker due to a lower level of qualified investments. The investment test performance in the limited-scope areas had a significant impact on the bank's overall investment test rating for the state of Michigan. Refer to the Table 14 in the state of Michigan 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 the state of Michigan is rated High Satisfactory. Based on the full-scope review, the bank's performance in the Battle Creek MSA is excellent.

### **Retail Banking Services**

Refer to Table 15 in the state of Michigan 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 state of Michigan, the bank purchased 18 branches from Bank of America, NA in July 2013, acquired 18 branch locations from United Bank and Trust in August 2014, and acquired four branches from Founders Bank and Trust in April 2015.

ONB's branch distribution is excellent when considering the bank's very limited presence in the AA. The bank operates two full-service branch offices in the Battle Creek MSA. One of these branches is located in a low-income geography.

ONB's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank closed one branch location in an upper-income geography during the evaluation period. The closing was due to a reduction in business activity at the branch location.

Banking hours and services do not vary in a way that inconveniences certain portions of the AA, particularly low- or moderate-income geographies or individuals. The services offered and hours of operation are comparable among locations regardless of the income level of the geography. The bank offers a wide range of traditional deposit and banking products. The bank makes adequate use of alternative delivery systems through ATMs, telephone and on-line banking, electronic bill pay, and

mobile banking options. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of LMI individuals.

### **Community Development Services**

ONB's performance of providing community development services is adequate in the Battle Creek MSA. Bank employees provide leadership and professional expertise by serving as board or committee members of two community development organizations whose programs target low- and moderate-income individuals and geographies within the bank's AA. In addition, the bank conducted three financial education seminars with 56 attendees at a nonprofit organization that was targeted to low- and moderate-income individuals. The educational seminars provided guidance for basic banking and financial management instruction.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the service test in the Grand Rapids-Wyoming MI MSA and Jackson MSA is not inconsistent with the bank's overall high satisfactory performance in Michigan. Performance in the Ann Arbor MI MSA, Kalamazoo-Portage MI MSA, and MI non-MSA AA is weaker than ONB's overall performance in the state. In the Monroe MI MSA, Niles-Benton Harbor MI MSA, and Warren-Troy-Farmington Hills MI MSA, the bank's performance was stronger than its overall performance in the state. The performance differences were primarily due to branch distribution. Because the combined limited-scope AAs account for such a large portion of the rating area, and most of these areas have weaker performance than the full-scope area, the combined limited-scope area has a negative impact on the Service Test rating 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.

## State Rating

### State of Ohio

<b>CRA Rating for Ohio<sup>5</sup>:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	<b>High Satisfactory</b>
<b>The investment test is rated:</b>	<b>Needs to Improve</b>
<b>The service test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include:

- The geographic distribution of loans reflects adequate penetration among geographies of different income levels, with poor small loans to businesses and adequate small loans to farms performance;
- Overall excellent borrower income distribution of loans, with excellent penetration among businesses and farms of different revenue sizes;
- ONB's qualified investment performance is poor; and
- The bank's branch distribution is considered adequate.

### Description of Bank's Operations in Ohio

Old National Bank has only one AA within the State of Ohio. The AA consisted of the Darke County (a non-MSA county) in Ohio. Based on the FDIC Summary of Deposit information as of June 30, 2015, the bank had \$40.5 million in deposits in the state of Ohio, which represented 0.46 percent of the bank's total deposits.

As of the end of the evaluation period, the bank had no branch locations and no deposit-taking ATMs within the state. In August 2015, ONB sold its one branch office located to Main Source Financial and exited the State of Ohio. Because this AA was in existence for the vast majority of the evaluation period, performance in the AA was assessed. The bank achieved a 3.77 percent market share of deposits, ranking seventh among 11 banks in the AA. Primary competitors include The Park National Bank, Greenville National Bank, The Farmers State Bank, and Greenville Federal. Refer to the market profile for the state of Ohio in appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

### Scope of Evaluation in Ohio

For the state of Ohio, the Darke County AA was selected for analysis using full-scope procedures as it is the only AA in the rating area. The bank originated or purchased only a sufficient volume of small loans

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<sup>5</sup> For banks 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 bank's performance in that area.

to businesses and small loans to farms to perform a meaningful analysis. When evaluating the bank's performance under the Lending Test, we placed greater weight on the distribution of small loans to farms than the distribution of small business loans. We placed significant emphasis on small loans to farms due to it being the bank's primary loan product based on the bank's loan volume, business focus, and the AA's small farm credit needs. Refer to the table in Appendix A for more 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 the Darke County AA is adequate.

#### **Lending Activity**

The bank's overall lending activity is adequate for all types of loans in the AA. The bank's lending activity for home mortgage lending activity is poor, small business lending activity is good, and small farm lending activity is excellent.

Refer to Tables 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.

Based upon FDIC Deposit Market Share data as of June 30, 2015, ONB achieved a 3.77 percent market share of deposits, ranking seventh among 11 financial institutions in the AA, and ranking them in the top 63.6 percent of total depository banks.

Based upon 2015 Peer CRA Data, the bank achieved a 1.80 percent market share of small loans to businesses, ranking ninth among 28 reporting lenders, or the top 32.14 percent of lenders. The top five lenders for small business lending consisted of the nation's largest credit card lenders, which collectively had 70.69 percent of the market share. The bank achieved a 22.50 percent market share for lending to small farms, ranking second among 13 reporting lenders, or the top 15.38 percent of lenders.

### **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution is adequate. In evaluating the geographic distribution of home loans in the AA, it is important to note that under the 2010 U.S. Census, there was only one low-income census tract and only one moderate-income census tract in the AA. As such, the bank's performance in moderate-income geographies carried significantly greater weight when coming to our overall product conclusions.

#### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4, and 5 in the 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.

The bank did not originate or purchase a sufficient volume of home purchase loans, home improvement loans, or home refinance loans to perform a meaningful analysis.

***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 overall geographic distribution for small loans to businesses is poor. When performing our analysis, we considered that there were only 327 businesses in the one moderate-income CT. This illustrated that there were very limited opportunities for the bank to originate or purchase small loans to businesses in the moderate-income geography. The percentage of loans made in moderate-income geographies was significantly below the percentage of businesses in those geographies. The bank did not achieve a market share in the moderate-income CT.

***Small Loans to Farms***

Refer to Table 7 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/purchase of small loans to farms.

The overall geographic distribution for small loans to farms is adequate. The bank did not originate or purchase loans in either low- or moderate-income geographies. However, there are no farms in low-income geographies and only seven farms in moderate-income geographies.

***Lending Gap Analysis***

We evaluated the lending distribution in the Darke County AA to determine if any unexplained, conspicuous gaps existed. We used basic dot density maps and other reports on HMDA and CRA loan data to compare the geographies where loans were made to the geographies in the AA. We also considered competition, market conditions, and demographic information. No unexplained, conspicuous gaps were identified.

**Distribution of Loans by Income Level of the Borrower**

The bank's overall borrower distribution of loans by income level is excellent. The bank's borrower distribution of small loans to businesses and to small loans to farms is excellent. ONB did not originate a sufficient volume of home mortgage loans to perform a meaningful analysis.

***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.

***Small Loans to Businesses***

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.

The overall borrower distribution for small loans to businesses is excellent. The percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) approximated the

percentage of small businesses. The bank's market share of small loans to small businesses exceeded its overall market share 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/purchase of small loans to farms.

The overall borrower distribution for small loans to farms is excellent. The percentage of small loans to small farms (farms with gross annual revenues of \$1 million or less) was near to the percentage of small farms. The bank's market share of small loans to small farms exceeded its overall market share 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 community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes borrower lending data on all multifamily loans, including those that also qualify as community development loans. However, table 5 does not separately list community development loans.

CD lending had a neutral impact on the lending performance in the state of Ohio. During the evaluation period, ONB did not originate any CD loans in the AA. However, there are minimal opportunities to make CD loans in the AA during the evaluation period. We identified one CD organization in the AA. In addition competition to make CD loans is strong with numerous other deposit taking institutions based in the AA.

### **Product Innovation and Flexibility**

Flexible and innovative loan programs had a neutral impact on the bank's lending performance in the Darke County AA. Refer to the Other Performance Data – section in the overall Scope of Evaluation section for additional information.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the investment test in the state of Ohio is Needs to Improve. Based on the full-scope review, the bank's performance in the Darke County AA is poor.

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.

ONB exhibited poor responsiveness to the community development investment needs of the Ohio Non MSA. Current period investments total \$91 thousand that directly and positively affect the AA. ONB made \$91 thousand in investments in CRA qualifying mortgage backed securities. While not innovative, these investments provide ongoing responsiveness to affordable housing needs in the

community. The bank also invested in community organizations with 2 grants totaling \$600. These grants support community services for low- and moderate-income families.

To provide perspective regarding the relative level of qualified community development investments, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The dollar amount of the current and prior period investments represents 1.96 percent of the allocated portion of the bank's Tier One Capital in the Ohio Non MSA.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the service test in the state of Ohio is rated Low Satisfactory. Based on the full-scope review, the bank's performance in the Darke County AA 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.

The bank's branch distribution in the Darke County AA is adequate when considering its very limited presence. The bank's one branch in the AA was located in a middle-income geography, which contains eighty-five percent of the AA's population and eighty-three percent of the AA's LMI families. The services offered and hours of operation at this branch are comparable to other ONB branches. The bank does not have any ATMs in the AA. During the evaluation period, the bank did not open any branches in the AA. The bank sold this office to Main Source Financial Group in August 2015. The bank makes adequate use of alternative delivery systems through telephone and on-line banking, electronic bill pay, and mobile banking options. We did not place significant weight on these alternative delivery systems, as the bank did not maintain sufficient metrics to determine their effectiveness in helping to meet the service and credit needs of LMI individuals.

### **Community Development Services**

The bank's performance in providing community development services in the Drake County Non-MSA is adequate. Three bank employees provided financial assistance to a community development organization serving LMI individuals.

## 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 01/01/2013 to 12/31/2015 Investment and Service Tests and CD Loans: 01/01/2013 to 12/31/2015	
<b>Bank</b>	<b>Products Reviewed</b>	
Old National Bank (ONB) Evansville, IN	Home Purchase, Home Improvement, and Home Refinance loans; Multifamily loans; Small Business loans; Small Farm loans; Community Development loans, investments, and services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Old National Foundation, Inc.	Affiliate	Community Development Investments
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Evansville IN-KY MMA	Full-Scope	Posey, Vanderburgh, Gibson (2013 only) and Warrick (IN), and Henderson (KY) counties.
Louisville-Jefferson County KY-IN MMA	Full-Scope	Jefferson (KY) and Washington(IN) counties
State of Illinois IL Non-MSA	Full-Scope	Clark, Jackson, Jefferson, Lawrence, Saline, Wabash, White, and Williamson counties
Carbondale-Marion MSA	Limited-Scope	Jackson and Williamson counties (2014 – 2015 only)
Danville MSA	Limited-Scope	Vermilion county
State of Indiana Indianapolis-Carmel-Anderson MSA	Full-Scope	Boone, Hamilton, Hendricks, Johnson, Madison (2014-2015 only) Marion, and Putnam counties
Terre Haute MSA	Full-Scope	Vermillion and Virgo counties
Anderson MSA	Limited-Scope	Madison county (2013 only)
Bloomington MSA	Limited-Scope	Monroe county
Columbus MSA	Limited-Scope	Bartholomew county
Elkhart-Goshen MSA	Limited-Scope	Elkhart county
Fort Wayne MSA	Limited-Scope	Allen county
IN Non-MSA	Full-Scope	Daviess, Decatur, Dubois, Fountain, Grant, Jackson, Jay, Jefferson, Jennings, Knox, Kosciusko (2014-2015 only), Lawrence,
	Limited-Scope	
	Limited-Scope	

		Martin, Orange, Parke, Perry, Randolph, Ripley, Scott, Spencer, Warren, Wayne counties.
Muncie MSA South Bend-Mishawaka IN MSA	Limited-Scope Limited-Scope	Delaware county St. Joseph county
State of Kentucky KY Non-MSA Owensboro MSA	Full-Scope Limited-Scope	Hopkins, Muhlenberg, and Union counties Daviness county
State of Michigan Battle Creek MSA Ann Arbor MSA Grand Rapids-Wyoming MSA Jackson MSA Kalamazoo-Portage MSA MI Non-MSA Monroe MSA Niles-Benton Harbor MSA Warren-Troy-Farmington Hills MD	Full-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope	Calhoun county Washtenaw county Kent county Jackson county Kalamazoo and Van Buren counties Lenawee (2015 and 2015 only) and St. Joseph counties Monroe county Berrien county Livingston county
State of Ohio Darke County Non-MSA	Full-Scope	Darke county

## 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	Outstanding	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Evansville IN-KY MMSA	Outstanding	Outstanding	Outstanding	Outstanding
Louisville-Jefferson County KY-IN MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Illinois	High Satisfactory	Needs to Improve	Low Satisfactory	Satisfactory
State of Indiana	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of Kentucky	Needs to Improve	Outstanding	High Satisfactory	Satisfactory
State of Michigan	Low Satisfactory	Outstanding	Outstanding	Satisfactory
State of Ohio	High Satisfactory	Needs to Improve	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 MMSA

Demographic Information for Full Scope Area: Evansville-Henderson IN-KY MMSA 2010 Census with 2014 OMB Changes						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	78	12.82	25.64	35.90	24.36	1.28
Population by Geography	311,552	6.25	21.47	38.19	34.09	0.00
Owner-Occupied Housing by Geography	87,656	4.28	17.98	40.62	37.12	0.00
Business by Geography	18,501	7.24	23.55	38.83	30.38	0.01
Farms by Geography	1,051	0.86	7.99	50.71	40.44	0.00
Family Distribution by Income Level	82,318	21.44	17.23	21.60	39.73	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	31,833	11.16	31.52	36.74	20.58	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		60,794 64,800 13%	Median Housing Value Unemployment Rate (2010 US Census)		115,643 3.29%	

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

Source: 2010 US Census and 2015 FFIEC updated MFI

Demographic Information for Full Scope Area: Evansville-Henderson IN-KY MMSA 2010 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	85	11.76	23.53	38.82	24.71	1.18
Population by Geography	345,055	5.64	20.34	38.20	35.81	0.00
Owner-Occupied Housing by Geography	97,757	3.84	17.26	40.12	38.78	0.00
Business by Geography	24,461	6.76	20.01	41.84	31.39	0.01
Farms by Geography	1,521	1.38	8.88	50.62	39.12	0.00
Family Distribution by Income Level	90,835	20.99	17.36	21.54	40.11	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	34,832	10.19	29.87	38.10	21.83	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2013 Households Below Poverty Level		60,518 60,100 13%	Median Housing Value Unemployment Rate		167,700 4.30%	

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

Source: Moody's Analytics, 2010 US Census and 2013 FFIEC updated MFI

The Evansville, IN-KY MMSA AA consists of all five counties in the Evansville, IN-KY MMSA. At the beginning of the evaluation period, this included Gibson, Posey, Vanderburgh, Warrick, and Henderson (KY) counties. With the 2014 OMB changes, Gibson County was removed from the MMSA and became a non-MSA county. According to the FDIC's Summary of Deposits, as of June 30, 2015, ONB's deposits in the AA comprised 18.53 percent of the bank's total deposits, making this the bank's largest AA in terms of deposits held.

According to June 30, 2015 FDIC Deposit Market Share data, competition is moderate with 21 deposit competitors operating 80 branches in the AA. ONB had a 30.29 percent deposit market share which ranked second among all depository banks in the AA. Major competitors include Fifth Third Bank, with a deposit market share of 32.01 percent, and German American Bancorp with a deposit market share of 6.49 percent.

The Evansville, IN-KY MMSA AA has a moderately-diversified economy. Key sectors of the economy include education and health services, manufacturing, professional and business services, and government. Major employers include Deaconess Hospital, Toyota Motor Manufacturing, St Mary's Medical Center, the Evansville Vanderburgh School Corporation, and the University of Southern Indiana. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Evansville, IN-KY MMSA was 4.3 percent in 2015, compared to 5.2 percent in 2014 and 6.8 percent in 2013. By way of comparison for the same period, the statewide unemployment rate in Indiana was 4.6 percent in 2015, 5.5 percent in 2014, and 6.4 percent in 2013; statewide unemployment rates in Kentucky were 5.3 percent in 2015, 5.3 percent in 2014, and 7.6 percent in 2013. The Bureau of Labor Statistics indicates the national unemployment rate was 7.4 percent in 2013, down to 6.2 percent in 2014, and then 5.3 percent for 2015.

The MMSA is a relatively high cost area, limiting access to homeownership for low-income borrowers. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$32,400 per year (or less than 50 percent of the FFIEC adjusted median family income in the AA) could afford at most a \$150,888 mortgage with a payment of \$810 per month. This illustrates that low- and moderate-income borrowers would not be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$568. The median housing value in the AA is \$104,700 and \$105,888 in 2013 and 2015 reflecting a percent change of 1.15 percent from 2013 to 2015 according to Realtor.com data.

Data from Moody's Analytics indicates the median price of a home as of December 31, 2015 was \$167,700 for the Evansville, IN-KY MMSA. Housing prices have steadily increased since 2010 when the median price was \$155,600. Foreclosure inventories are back down to where they were before the recession, and the homeowner vacancy rate is on par with the U.S. average.

We obtained community contact information by contacting affordable housing and economic development organizations, organizations providing financial literacy and homeownership education services, and social service organizations during an interagency community development listening session and previous interviews. We identified the following needs in the AA:

- Establishment of a CDFI;
- Development of intentional community development networks including banks and community development organizations;
- Financing of affordable multifamily rental housing for low- and moderate-income residents, as well as the preservation of existing affordable units;
- Affordable mortgage loans targeted to low- and moderate-income individuals;
- Rehabilitation of deteriorated pre-1960 housing in low- and moderate-income geographies;
- Small-dollar consumer loans;
- Credit-builder loans and second chance checking accounts;

- Financial counseling and education programs, and incentives for savings;
- Development of commercial/retail nodes in LMI neighborhoods to catalyze reinvestment and economic development;
- 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;
- Grants in support of nonprofit social service and community development organization administrative, program development and delivery capacity; and
- Workforce development for higher skilled health care, service, and manufacturing jobs.

We determined the opportunities to make CD loans and provide CD services within the AA are abundant. The AA has numerous CD organizations including nonprofit 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, new markets tax credits, mortgage-backed securities for affordable housing, and CRA QIF. Competition for CD loans, qualified investments, and CD services is moderate to high and consists primarily of local banks that have a presence within the AA.

## Louisville-Jefferson County KY-IN MMSA

Demographic Information for Full Scope Area: Louisville-Jefferson County KY-IN MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	197	17.26	19.29	34.01	28.93	0.51
Population by Geography	769,358	13.58	16.78	39.71	29.94	0.00
Owner-Occupied Housing by Geography	203,052	6.98	14.59	43.02	35.41	0.00
Business by Geography	59,694	14.71	13.97	30.83	40.10	0.39
Farms by Geography	1,430	5.87	18.11	38.25	37.62	0.14
Family Distribution by Income Level	192,853	23.26	17.62	19.91	39.21	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	78,835	23.08	23.52	38.57	14.83	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		60,164 65,400 15%	Median Housing Value Unemployment Rate		175,100 4.70%	

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

Source: Moody's Analytics, 2010 US Census and 2015 FFIEC updated MFI

The Louisville MSA AA consists of Jefferson County in Kentucky and Washington County in Indiana. According to the FDIC's 2015 data release, ONB deposits in the AA comprised 1.96 percent of total bank deposits.

According to June 30, 2015, FDIC Deposit Market Share data, competition is significant with 27 deposit competitors operating 245 branches in the AA. ONB had a 0.97 percent deposit market share, which ranked 11<sup>th</sup> among the 28 depository banks in the AA. Major competitors include PNC Bank with 26.37 percent deposit market share, JP Morgan Chase Bank, N.A. with deposit market share of 18.71 percent and Fifth Third Bank with 12.89 percent deposit market share.

The Louisville MSA AA has a diversified economy. Key sectors of the economy include motor vehicle parts manufacturing, education and health services, and government. Major employers include Fort Knox, UPS, Ford Motor Co., Humana Inc., and Norton Healthcare. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Louisville MSA was 7.2 percent in 2013, compared to 5.7 percent in 2014 and 4.7 percent in 2015. By way of comparison, for the same period the statewide unemployment rate in Indiana was 4.6 percent in 2015, 5.5 percent in 2014, and 6.4 percent in 2013; statewide unemployment rates in Kentucky were 5.3 percent in 2015, 5.3 percent in 2014, and 7.6 percent in 2013. The Bureau of Labor Statistics indicates the national unemployment rate was 7.4 percent in 2013, down to 6.2 percent in 2014, and then 5.3 percent for 2015.

Data from Moody's Analytics indicates the median price of a home at December 31, 2015 was \$175,100 for the Louisville MSA.

The MMSA is a relatively high cost area, limiting access to homeownership for low-income borrowers. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$32,700 per year (or less than 50 percent of the FFIEC adjusted median family income in the AA) could

afford at most a \$152,378 mortgage with a payment of \$818 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$886. The median housing value in the AA is \$138,400 and \$152,378 in 2013 and 2015 respectively, reflecting a percent change of 19.22 percent from 2013 to 2015 according to Realtor.com data.

To identify the AA's credit, investment, and service needs, we contacted an organization that provides affordable housing, economic development, and financial literacy services. In addition, we participated in an interagency community development listening session with organizations that provided information from affordable housing, economic development, and homelessness services. We identified the following needs in the AA:

- Down payment assistance and homeownership counseling;
- Financial literacy training and second chance banking products/services;
- Flexible construction and permanent loans for community development projects; and
- Social services funding for organizations assisting low- and moderate-income individuals/families.

Opportunities to provide CD loans, investments, and services in the AA are plentiful. There are numerous CD organizations serving the AA including CDFIs, CDCs, for profit and nonprofit housing organizations, small business organizations, and local government agencies. Opportunities to provide CD investments include low-income housing tax credits mortgage-backed securities for low- and moderate-income housing, and charitable donations. Competition for CD loans, investments, and services is moderate to high with numerous local financial institutions serving the AA and several larger regional financial institutions with a presence in the AA.

## State of Illinois

### IL Non-MSA

Demographic Information for Full Scope Area: IL Non-MSA 2010 Census with 2014 OMB Changes						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	38	2.63	23.68	71.05	2.63	0.00
Population by Geography	123,520	1.17	19.34	77.04	2.45	0.00
Owner-Occupied Housing by Geography	38,047	0.48	17.62	78.86	3.04	0.00
Business by Geography	6,731	4.69	17.46	74.05	3.80	0.00
Farms by Geography	872	0.00	5.16	94.38	0.46	0.00
Family Distribution by Income Level	33,931	22.75	19.90	22.37	34.98	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	14,471	1.53	25.76	71.25	1.46	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		54,499 60,100 15%	Median Housing Value Unemployment Rate (2010 US Census)		76,942 3.74%	

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

Source: 2010 US Census and 2015 FFIEC updated MFI

Demographic Information for Full Scope Area: IL Non-MSA 2010 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	67	2.99	26.87	64.18	5.97	0.00
Population by Geography	250,095	3.39	23.18	66.47	6.96	0.00
Owner-Occupied Housing by Geography	70,351	0.94	18.49	72.48	8.09	0.00
Business by Geography	16,986	3.39	29.51	59.37	7.73	0.00
Farms by Geography	1,553	0.52	7.08	89.12	3.28	0.00
Family Distribution by Income Level	63,479	23.46	19.06	21.37	36.11	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	26,991	2.82	27.32	66.04	3.82	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2013 Households Below Poverty Level		54,549 56,200 19%	Median Housing Value Unemployment Rate (2010 US Census)		87,412 4.26%	

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

Source: 2010 US Census and 2013 FFIEC updated MFI

At the beginning of the evaluation period, this AA consisted of eight non-MSA counties (Clark, Jackson, Jefferson, Lawrence, Saline, Wabash, White, and Williamson) located in southeastern Illinois. With the 2014 OMB changes, Jackson and Williamson Counties were redesignated and became the Carbondale-Marion MSA. According to the FDIC's Summary of Deposits, as of June 30, 2015 ONB's deposits in the AA comprised 3.61 percent of the bank's total deposits.

According to June 30, 2015, FDIC Deposit Market Share data, competition is moderate with 25 deposit competitors operating 65 offices in the AA. ONB had an 11.13 percent deposit market share, which

ranks first among all depository banks. Major competitors include First Southern Bank with a deposit market share of 11.01 percent and People's National Bank with a deposit market share of 8.82 percent.

The bank achieved a 12.24 percent market share of deposits, ranking second among 25 banks in the AA. Primary competitors include Casey State Bank, Peoples National Bank NA, Banterra Bank, and Community First Bank of the Heartland.

The IL Non-MSA AA has a moderately-diversified economy. Key sectors of the economy include mining, government, manufacturing, and agriculture. Though the AA is predominantly rural, it does contain one MSA. Six of the counties are non-MSA and two constitute the Carbondale-Marion MSA. On average, 71 percent of the AA workforce works outside the counties in which they reside. Based on data from the Bureau of Labor Statistics, the unemployment rate in the IL Non-MSA AA was 6.9 percent in 2015, compared to 5.7 percent in 2014 and 8.5 percent in 2013. By way of comparison, for the same period the statewide unemployment rate in Illinois was 6.1 percent in 2015, 6.1 percent in 2014, and 8.4 percent in 2013; the national unemployment rate was 4.8 percent in 2015, 5.4 percent in 2014, and 6.5 percent in 2013.

According to the US Census Bureau American FactFinder, the median price of a home as of December 31, 2015 was \$82,975 for the IL Non MSA AA. Housing prices have remained stable for the period: \$82,913 in 2014 and \$82,238 in 2013.

We contacted three organizations to identify the AA's lending, investment, and service needs. These include a regional economic development organization, a regional small and micro business lending and technical assistance provider, and a statewide community development, leadership, and agricultural services organization. We identified the following needs in the AA:

- Financing of affordable multifamily rental housing for low- and moderate-income residents, as well as the preservation of existing affordable units;
- Down payment assistance for rental housing development and single-family homeownership;
- Financing for single-family rehab and home improvement;
- Job training for higher skilled health care, service, and manufacturing jobs and financial literacy;
- Financing in support of industry attraction and expansion of local industry;
- Affordable micro business loans;
- Wider access and utilization of gap financing and credit enhancement programs for economic development lending;
- Grants and Services in support of nonprofit community development organization management and program capacity;
- Various community services for senior citizens such as tax preparation assistance, transportation, financial counseling, and funding for emergency assistance grants; and
- Agriculture production and distribution finance.

We determined that opportunities to make CD loans and provide CD services are moderate. Opportunities to make qualified investments other than donations do exist but are limited and generally available on a regional basis. These opportunities include low-income housing tax credits, new markets tax credits, mortgage-backed securities for affordable housing, and some targeted municipal bonds. The AA has a moderate number of government agencies involved in economic and business development, fewer providing affordable housing, and few non-profit community

development organizations. There are an abundance of agencies providing social services to low- and moderate-income families.

# State of Indiana

## Indianapolis-Carmel-Anderson IN MSA

Demographic Information for Full Scope Area: Indianapolis-Carmel-Anderson IN MSA 2010 Census with 2014 OMB Changes						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	360	13.89	28.61	33.33	23.89	0.28
Population by Geography	1,689,303	8.67	24.94	33.62	32.57	0.20
Owner-Occupied Housing by Geography	431,705	5.55	19.96	36.69	37.79	0.00
Business by Geography	115,755	5.45	20.34	36.64	37.54	0.03
Farms by Geography	3,808	2.42	10.79	52.52	34.24	0.03
Family Distribution by Income Level	417,902	21.46	17.22	20.29	41.02	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	161,648	16.26	35.87	31.56	16.31	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		64,663 68,900 12%	Median Housing Value Unemployment Rate (2010 US Census)		145,237 4.12%	

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

Source: 2010 US Census and 2015 FFIEC updated MFI

Demographic Information for Full Scope Area: Indianapolis-Carmel-Anderson IN MSA 2010 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	323	14.86	27.55	33.75	23.84	0.00
Population by Geography	1,557,667	9.21	23.94	34.90	31.96	0.00
Owner-Occupied Housing by Geography	393,925	5.90	18.78	38.13	37.19	0.00
Business by Geography	131,599	6.09	19.46	38.02	36.43	0.00
Farms by Geography	3,780	2.94	13.31	51.11	32.65	0.00
Family Distribution by Income Level	384,330	21.95	17.09	20.19	40.78	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	150,022	17.12	34.55	32.75	15.58	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2013 Households Below Poverty Level		66,347 65,100 12%	Median Housing Value Unemployment Rate		127,900 4.50%	

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

Source: Moody's Analytics, 2010 US Census and 2013 FFIEC updated MFI

At the beginning of the evaluation period, the Indianapolis-Carmel, IN MSA AA consisted of six of the 10 counties in the Indianapolis-Carmel, IN MSA: Boone, Hamilton, Hendricks, Johnson, Marion, and Putnam Counties. With the 2014 OMB changes, Madison County was added to the MSA. According to the FDIC's Summary of Deposits, as of June 30, 2015 ONB's deposits in the AA comprised 10.04 percent of the bank's total deposits.

According to June 30, 2015 FDIC Deposit Market Share data, competition is significant with 44 deposit competitors operating 508 branches in the AA. ONB had a 2.19 percent deposit market share which ranked 11<sup>th</sup> among all depository banks. Major competitors include JPMorgan Chase Bank, N.A. with a

25.15 percent market share, PNC Bank, N.A. with a 19.28 percent market share, and Fifth Third Bank with a market share of 9.25 percent.

The bank achieved a 2.19 percent market share of deposits, ranking ninth among 44 banks in the AA. The banking industry is highly competitive in the AA and includes branches of national, regional, and local community banks. Primary competitors include JPMorgan Chase Bank NA, PNC Bank NA, The Huntington NA, Fifth Third Bank, and KeyBank NA.

The Indianapolis-Carmel, IN MSA AA has a well-diversified economy. Key sectors of the economy include professional and business services, education and health services, and government. Major employers in the AA include: Indiana University Health, St. Vincent Hospitals and Health Services, and Purdue University. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Indianapolis-Carmel, IN MSA was 4.5 percent in 2015, compared to 5.6 percent in 2014 and 7.2 percent in 2013. By way of comparison for the same period, the statewide unemployment rate in Indiana was 4.6 percent in 2015, 5.5 percent in 2014, and 6.4 percent in 2013. The Bureau of Labor Statistics indicates the national unemployment rate was 7.4 percent in 2013, down to 6.2 percent in 2014, and then 5.3 percent for 2015.

Data from Moody's Analytics indicates the median price of a home at December 31, 2015 was \$127,900 for the Indianapolis-Carmel, IN MSA. This is a 15 percent increase from the median home price of \$111,000 in 2013.

The high price of cost of housing makes it difficult for low- and moderate-income borrowers to achieve homeownership. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$32,800 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$152,751 mortgage with a payment of \$820 per month. A moderate-income borrower making \$52,480 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$244,401 mortgage with a payment of \$1,312 per month. This illustrates that low- and moderate-income borrowers would not be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$805. The median housing value in the AA is \$128,600 and \$149,900 in 2013 and 2015 respectively, reflecting a percent change of 16.56 percent from 2013 to 2015 according to Realtor.com data.

We contacted an organization that provides affordable housing development, lending, and policy organization, an association of community and economic development agencies, and an affordable housing provider to identify the lending, investment, and service needs in the AA. We identified the following loan, investment, and service needs in the AA:

- Affordable home purchase loans, home improvement loans, and rehab loans;
- Financing of affordable multifamily rental housing for low- and moderate-income residents, as well as the preservation of existing affordable units;
- Private finance of small-scale mixed use commercial/retail/residential projects;
- Small business loans including leasehold improvement and working capital financing;
- Workforce development for higher skilled health care, service, and manufacturing jobs;
- Small-dollar consumer loans;
- Credit-builder loans and second chance checking accounts;
- Financial counseling and education programs, and incentives for savings;

- Grants in support of 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 nonprofit organizations to acquire single family homes for redevelopment; and
- Participation in community economic development leadership efforts.

Opportunities to make CD loans and provide CD services are abundant in the AA. There are numerous CD organizations in the AA. These include economic development and business development organizations, CDC's, CDFI's, nonprofit housing organizations and social service agencies that provide CD services to low- and moderate-income individuals. The opportunity to make qualified investments include low-income housing tax credits, new markets tax credits, mortgage-backed securities for affordable housing. Competition for CD loans, qualified investments, and CD services is moderate to high and consists primarily of local banks that have a presence within the AA.

## Terre Haute IN MSA

Demographic Information for Full Scope Area: Terre Haute IN MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	33	18.18	21.21	42.42	18.18	0.00
Population by Geography	124,060	14.32	17.48	41.77	26.43	0.00
Owner-Occupied Housing by Geography	31,859	6.79	17.68	45.61	29.92	0.00
Business by Geography	6,562	19.96	14.93	40.11	24.99	0.00
Farms by Geography	361	1.94	4.99	55.40	37.67	0.00
Family Distribution by Income Level	29,505	22.09	18.63	18.74	40.54	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	12,015	18.51	23.27	41.30	16.92	0.00
Median Family Income		51,224	Median Housing Value		148,500	
FFIEC Adjusted Median Family Income for 2015		55,900	Unemployment Rate		6.30%	
Households Below Poverty Level		18%				

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

Source: Moody's Analytics, 2010 US Census and 2015 FFIEC updated MFI

The Terre Haute MSA AA consists of Vermillion and Vigo Counties in Indiana. According to the FDIC's Summary of Deposits, as of June 30, 2015 ONB's deposits in the AA comprised 3.70 percent of the bank's total deposits.

According to June 30, 2015 FDIC Deposit Market Share data, competition is minimal with approximately eight deposit competitors operating 33 offices in the AA. ONB ranked second in the AA with a 17.03 percent deposit market share. Major competitors include First Financial Bank, N.A. with 55.16 percent market share, Terre Haute Savings Bank with 12.40 percent deposit market share and Fifth Third Bank with deposit market share of 6.94 percent.

The bank achieved a 17.03 percent market share of deposits, ranking second among 9 banks in the AA. Primary competitors include First Financial Bank NA, Terre Haute Savings Bank, Fifth Third Bank, and First Farmers Bank and Trust Company. 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.

The Terre Haute MSA AA has a moderately diversified economy that is in recovery. Key sectors of the economy include plastic product manufacturing, education and health services, and government. Major employers include Union Hospital Health Care Group, Indiana State University and Sony DADC. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Terre Haute MSA was 9.2 percent in 2013, compared to 7.4 percent in 2014 and 6.3 percent in 2015. By way of comparison for the same period, the statewide unemployment rate in Indiana was 4.6 percent in 2015, 5.5 percent in 2014, and 6.4 percent in 2013. The Bureau of Labor Statistics indicates the national unemployment rate was 7.4 percent in 2013, down to 6.2 percent in 2014, and then 5.3 percent for 2015.

Data from Moody's Analytics indicates the median price of a home at December 31, 2015 was \$148,500 for the Terre Haute MSA.

The cost of housing makes it difficult for low- and moderate-income borrowers to achieve homeownership. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$26,200 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$122,014 mortgage with a payment of \$655 per month. A moderate-income borrower making \$41,920 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$195,223 mortgage with a payment of \$1,048 per month. This illustrates that low- and moderate-income borrowers would not be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$421. The median housing value in the AA is \$79,900 and \$78,500 in 2013 and 2015 respectively, reflecting a percent change of -1.75 percent from 2013 to 2015 according to Realtor.com data.

We contacted a regional economic development organization and a local economic development organization to identify the lending, investment, and service needs in the AA. We identified the following needs in the AA:

- Home ownership down payment savings programs;
- First-time home buyer programs post financing; and
- Financing for nonprofit organizations to acquire and renovate foreclosed homes.

There is a moderate number of opportunities to provide CD loans, qualified investments, or CD services in the AA. The opportunities include a locally based economic development organization and a regional economic development organization. There are a modest number of private nonprofit organizations serving the AA. In addition, we identified opportunities to provide match funding for home rehab programs, post financing homeownership counseling, and financial literacy training. The AA competition for CD loans, qualified investments, and CD services is high in comparison to the number of opportunities and consists of locally-based financial institutions and regional financial institutions with a presence in the AA.

# State of Kentucky

## Kentucky Non-MSA

Demographic Information for Full Scope Area: Kentucky Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	25	0.00	16.00	56.00	28.00	0.00
Population by Geography	93,426	0.00	10.85	59.24	29.91	0.00
Owner-Occupied Housing by Geography	27,515	0.00	8.46	61.22	30.32	0.00
Business by Geography	5,288	0.00	16.64	54.07	29.29	0.00
Farms by Geography	433	0.00	3.00	56.58	40.42	0.00
Family Distribution by Income Level	25,715	17.66	16.40	20.60	45.34	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	8,758	0.00	15.68	62.38	21.95	0.00
Median Family Income		43,402	Median Housing Value		78,585	
FFIEC Adjusted Median Family Income for 2015		46,900	Unemployment Rate (2010 US Census)		3.91%	
Households Below Poverty Level		17%				

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

Source: 2010 US Census and 2015 FFIEC updated MFI

ONB's AA consists of three non-MSA counties (Hopkins, Muhlenberg, and Union) located in western Kentucky. According to the FDIC's Summary of Deposits, as of June 30, 2015 ONB's deposits in the AA comprised 4.04 percent of the bank's total deposits.

According to June 30, 2015 Deposit Market Share data, competition is relatively minimal with 13 deposit competitors operating 35 offices in the AA. ONB ranked first in the AA with a 26.21 percent deposit market share. Major competitors include Fifth Third Bank with a deposit market share of 12.74 percent, First United Bank and Trust with a deposit market share of 11.26 percent, and United Community Bank of West Kentucky with a deposit market share of 10.06 percent.

The KY Non-MSA AA has a moderately-diversified economy. Key sectors of the economy include government, mining, and healthcare and social services. Though all three of the counties in the AA are non-MSA, each is adjacent to an MSA. Union County is adjacent to Henderson County which is part of the Evansville, IN-KY MSA. Hopkins and Muhlenberg Counties are adjacent to the Clarksville-Hopkinsville, TN-KY MSA. On average, 27 percent of the AA workforce works outside the counties in which they reside. Based on data from the Bureau of Labor Statistics, the unemployment rate in the KY Non-MSA AA was 6.8 percent in 2015, compared to 5.2 percent in 2014 and 7.1 percent in 2013. By way of comparison for the same period, the statewide unemployment rate in Kentucky was 5.3 percent in 2015, 5.3 percent in 2014, and 7.6 percent in 2013; the national unemployment rate was 4.8 percent in 2015, 5.4 percent in 2014, and 6.5 percent in 2013. The Bureau of Labor Statistics indicates the national unemployment rate was 7.4 percent in 2013, down to 6.2 percent in 2014, and then 5.3 percent for 2015.

The relatively high cost for housing in the KY Non-MSA AA makes it difficult for low-income borrowers to achieve homeownership. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$23,450 per year (or less than 50 percent of the 2016 FFIEC adjusted median

family income in the AA) could afford a \$109,208 mortgage with a payment of \$586 per month. A moderate-income borrower making \$37,520 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$174,732 mortgage with a payment of \$938 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$629. The median housing value in the AA is \$121,200 and \$117,200 in 2013 and 2015 respectively, reflecting a percent decrease of 3.3 percent from 2013 to 2015 according to Zillow.com data.

According to the US Census Bureau American FactFinder, the median price of a home as of December 31, 2015 was \$83,300 for the KY Non MSA AA. Housing prices have risen slightly for the period: \$82,033 in 2014 and \$79,233 in 2013.

We contacted an affordable housing organization and a small business and economic development organization to identify the lending, investment, and service needs in the AA. We identified following needs in the AA:

- Down payment assistance for low- and moderate-income first-time home buyers;
- Affordable manufactured home purchase finance;
- Financing of affordable multifamily rental housing for low- and moderate-income residents, as well as the preservation of existing affordable units;
- Workforce development for higher skilled jobs;
- Small business lending and micro-lending;
- Various community services targeted to low- and moderate-income individuals such as transportation assistance, utilities assistance, job training, and financial literacy; and
- Financial literacy classes.

Opportunities to make CD loans and provide CD services within the AA are moderate. The AA has business and economic development agencies, housing agencies, and social service agencies that provide community services to low- and moderate-income individuals. The opportunity to make qualified investments other than donations is limited and consists of mortgage-backed securities for affordable housing and potential activity with four statewide CDFI's. 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 Michigan

## Battle Creek MI MSA

Demographic Information for Full Scope Area: Battle Creek MI MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	39	10.26	28.21	38.46	23.08	0.00
Population by Geography	136,146	6.37	25.80	39.54	28.29	0.00
Owner-Occupied Housing by Geography	38,891	4.91	22.42	38.92	33.75	0.00
Business by Geography	7,220	8.61	22.83	38.05	30.51	0.00
Farms by Geography	504	1.19	11.51	56.35	30.95	0.00
Family Distribution by Income Level	35,859	20.99	18.07	20.52	40.42	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	14,006	11.70	35.25	36.30	16.75	0.00
Median Family Income		52,533	Median Housing Value		151,600	
FFIEC Adjusted Median Family Income for 2015		53,400	Unemployment Rate		3.9%	
Households Below Poverty Level		15%				

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

Source: Moody's Analytics, 2010 US Census and 2015 FFIEC updated MFI

The Battle Creek MSA AA consists of one county, Calhoun, which is the entire MSA. According to the FDIC's Summary of Deposits, as of June 30, 2015, ONB's deposits in the AA comprised 0.67 percent of the bank's total deposits.

According to June 30, 2015 FDIC Deposit Market Share data, competition is relatively minimal with 12 deposit competitors operating 29 branches in the AA. ONB ranked fifth among these depositors with a 6.04 percent deposit market share. Major competitors include Chemical Bank with 32.07 percent market share, Comerica Bank with 20.99 percent deposit market share, and Fifth Third Bank with deposit market share of 10.81 percent.

The Battle Creek MSA AA has a moderately diversified economy that is in recovery. Job growth is lagging; however, the unemployment rate is lower than the national unemployment rate. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Battle Creek MSA was 6.7 percent in 2013, compared to 5.0 percent in 2014 and 3.9 percent in 2015. By way of comparison for the same period, the statewide unemployment rate in Michigan was 5.0 percent in 2015, 6.2 percent in 2014, and 8.1 percent in 2013; the national unemployment rate was 4.8 percent in 2015, 5.4 percent in 2014, and 6.5 percent in 2013.

Key sectors of the economy include motor vehicle parts manufacturing, education and health services, and government. Major employers include DENSO Manufacturing Michigan, Kellogg Co., Firekeepers Casino, Veterans Administration Medical Center, and Bronson Battle Creek.

Data from Moody's Analytics indicates the median price of a home at December 31, 2012 was \$151,600 for the Battle Creek MSA.

The high cost of housing in the Battle Creek MSA makes it difficult for LMI borrowers to achieve homeownership. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$27,750 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$129,233 mortgage with a payment of \$694 per month. A moderate-income borrower making \$44,400 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$206,773 mortgage with a payment of \$1,110 per month. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$609. The median housing value in the AA is \$89,900 and \$113,500 in 2013 and 2015 respectively, reflecting a percent change of 26.25 percent from 2013 to 2015 according to Realtor.com data.

To identify the lending, investment, and service needs in the AA, we contacted an affordable housing organization, a regional small business and economic development technical services provider, and a regional affordable housing organization. We identified the following needs in the AA:

- Home ownership down payment savings programs;
- Additional affordable housing units for LMI families;
- First-time home buyer programs post financing; and
- Financing for nonprofit organizations to acquire and renovate foreclosed homes.

There is an adequate level of opportunities for banks to provide CD loans, qualified investments, or CD services in the AA. These include funding for home rehabilitation programs, post financing homeownership counseling, and financial literacy training and credit repair counseling.

# State of Ohio

## Darke County Ohio

Demographic Information for Full Scope Area: Darke County Ohio						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	12	0.00	8.33	83.33	8.33	0.00
Population by Geography	52,959	0.00	7.37	84.88	7.75	0.00
Owner-Occupied Housing by Geography	16,162	0.00	6.17	86.21	7.62	0.00
Business by Geography	3,063	0.00	10.68	83.51	5.81	0.00
Farms by Geography	677	0.00	1.03	76.51	22.45	0.00
Family Distribution by Income Level	14,530	17.21	18.80	24.32	39.68	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	5,232	0.00	10.95	83.39	5.66	0.00
Median Family Income		52,573	Median Housing Value		116,070	
FFIEC Adjusted Median Family Income for 2015		56,900	Unemployment Rate		4.00%	
Households Below Poverty Level		11%				

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

Source: 2010 US Census and 2015 FFIEC updated MFI

The Darke County Ohio AA consists of Darke County, a non-MSA county located in western Ohio. ONB sold the one branch office located within the AA to Main Source Financial in August 2015 and exited the State of Ohio. According to the FDIC's Summary of Deposits, as of June 30, 2015, ONB's deposits in the AA comprised 0.46 percent of the bank's total deposits, making this the bank's second smallest in terms of deposits held. ONB operated one branch in the AA until August 2015 when it was sold to Main Source Financial Group.

According to June 30, 2015 FDIC Deposit Market Share data, competition is relatively minimal with 10 deposit competitors operating 24 branches in the AA. ONB had a 3.77 percent deposit market share, which ranked seventh among all banks in the AA. Major competitors included Greenville National Bank with 29.01 percent deposit market share, Park National Bank with 24.21 percent market share, and Greenville Federal with deposit market share of 10.35 percent.

Darke County is primarily rural farming community with over 600 square miles of land. The county's farming economy is dominated by corn, soybean, and egg production. 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 Greenville Technology, Whirlpool Corporation, Midmark Corporation, and Wayne HealthCare.

The Darke County Ohio AA has a moderately diversified economy. Key sectors of the economy include manufacturing, education and health services, and agriculture. Major employers include Greenville Technology, Whirlpool Corporation, Midmark Corporation, and Wayne HealthCare. Based on data from the Bureau of Labor Statistics, the unemployment rate in Drake County was 6.1 percent in 2013 compared to 4.5 percent in 2014, and 4.0 percent in 2015. By way of comparison for the same period, the statewide unemployment rate in Ohio was 4.9 percent in 2015, 5.1 percent in 2014, and 6.8 percent in 2013; the national unemployment rate was 4.8 percent in 2015, 5.4 percent in 2014, and 6.5 percent in 2013.

Overall, the cost of housing in the AA is reasonably affordable for low- and moderate-income individuals. Data from the United States Census Bureau indicates the median housing value in Darke County was \$116,070 as of December 31, 2015. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$28,450 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$132,493 mortgage with a payment of \$711 per month. A moderate-income borrower making \$45,520 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$211,988 mortgage with a payment of \$1,138 per month. This illustrates that low- and moderate-income borrowers would be able to qualify for a mortgage loan in the AA with an estimated payment of \$509. The median housing value in the AA is \$89,900 and \$94,900 in 2013 and 2015 reflecting a percent change of 5.56 percent from 2013 to 2015 according to Zillow.com data.

We contacted a local economic development professional to identify the lending, investment, and service needs in the AA. We identified the following AA needs:

- Various community services targeted to low- and moderate-income individuals;
- Affordable micro business loans;
- Alternative crop financing;
- Rehabilitation financing of affordable multifamily rental properties; and
- Financing of affordable multifamily rental housing for low- and moderate-income residences.

We determined there are minimal opportunities to make CD loans and provide CD services within the AA. The opportunities consists of financing affordable housing for low- and moderate-income individuals and offering CD services. The county has an economic development organization that targets business expansion and job creation projects in the AA. 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

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### 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 30<sup>th</sup> 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. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- 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. Borrower 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. Borrower Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Borrower Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Borrower 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. Borrower 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 borrower areas smaller than counties, it may be necessary to use borrower areas larger than the bank's assessment area.
- Table 7. Borrower 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 borrower areas smaller than counties, it may be necessary to use borrower 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. Borrower and Borrower Distribution of Consumer Loans (OPTIONAL)** - For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

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

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

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

# Tables of Performance Data

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EVANSVILE-HENDERSON IN-KY MMSA .....D-5

LOUISVILLE-JEFFERSON COUNTY KY-IN .....D-19

STATE OF ILLINOIS .....D-33

STATE OF INDIANA.....D-47

STATE OF KENTUCKY .....D-61

STATE OF MICHIGAN .....D-75

STATE OF OHIO.....D-89

# Evansville-Henderson IN-KY MMSA

## Table 1. Lending Volume

LENDING VOLUME												
Geography: EVANSVILLE IN-KY MMSA												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015												
Assessment Area (2015):	% 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)	
<b>Full Review:</b>												
Evansville-Henderson IN-KY MMSA	100.00	1,113	139,389	1,015	170,432	47	4,657	16	25,403	2,191	339,881	100.00

\* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2013 to December 31, 2015.

\*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or bank, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: EVANSVILLE IN-KY MMSA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015									
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	Over all	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Evansville-Henderson IN-KY MMSA	490	100.00	4.28	3.88	17.98	17.14	40.62	32.04	37.12	46.94	4.21	7.14	4.12	3.81	4.43	

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: EVANSVILLE IN-KY MMSA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015								
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
<b>Full Review:</b>															
Evansville-Henderson IN-KY MMSA	299	100.00	4.28	4.01	17.98	15.72	40.62	43.48	37.12	36.79	13.18	13.64	12.42	16.44	10.64

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: EVANSVILLE IN-KY MMSA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015									
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
Full Review:															
Evansville-Henderson IN-KY MMSA	312	100.00	4.28	2.88	17.98	17.63	40.62	32.05	37.12	47.44	4.14	3.85	4.63	3.38	4.61

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: EVANSVILLE IN-KY MMSA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015								
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
<b>Full Review:</b>															
Evansville-Henderson IN-KY MMSA	12	100.00	8.64	8.33	37.76	41.67	34.27	25.00	19.33	25.00	7.89	0.00	0.00	7.14	25.00

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi-Family Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: EVANSVILLE IN-KY MMSA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Evansville-Henderson IN-KY MMSA	1,015	100.00	7.24	8.97	23.55	28.37	38.83	34.29	30.38	28.37	12.89	14.81	15.46	13.13	10.82

\* Based on 2015 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 (2015).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: EVANSVILLE IN-KY MMSA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
Evansville-Henderson IN-KY MMSA	47	100.00	0.86	0.00	7.99	0.00	50.71	46.81	40.44	53.19	9.62	0.00	0.00	9.46	12.09	

\* Based on 2015 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 (2015).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: EVANSVILLE IN-KY MMSA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
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 6	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Evansville-Henderson IN-KY MMSA	490	100.00	21.44	14.91	17.23	24.54	21.60	19.50	39.73	41.06	4.66	4.21	4.21	3.83	5.87

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 11.0% of loans originated and purchased by bank. 6 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: EVANSVILLE IN-KY MMSA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families* **	% BANK Loans****	% Families <sup>7</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Evansville-Henderson IN-KY MMSA	299	100.00	21.44	14.23	17.23	22.63	21.60	24.82	39.73	38.32	12.22	15.13	13.94	8.93	12.87

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 8.4% of loans originated and purchased by bank.

<sup>7</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: EVANSVILLE IN-KY MMSA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
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 <sup>8</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Evansville-Henderson IN-KY MMSA	312	100.00	21.44	9.79	17.23	22.03	21.60	24.48	39.73	43.71	4.83	3.33	5.80	3.59	5.49

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 8.3% of loans originated and purchased by bank.

<sup>8</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: EVANSVILLE IN-KY MMSA			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
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
<b>Full Review:</b>									
Evansville-Henderson IN-KY MMSA	1,015	100.00	74.88	43.55	60.89	18.72	20.39	12.89	14.32

\* Based on 2015 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 - 2015).

\*\*\*\* 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 10.05% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: EVANSVILLE IN-KY MMSA			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Evansville-Henderson IN-KY MMSA	47	100.00	98.57	80.85	65.96	27.66	6.38	9.62	12.34

\* Based on 2015 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 - 2015).

\*\*\*\* 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 12.77% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: EVANSVILLE IN-KY MMSA				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Evansville-Henderson IN-KY MMSA	0	0	291	20,598	291	20,598	100.00	0	0

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\* '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 bank's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: EVANSVILLE IN-KY MMSA				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015									
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
<b>Full Review:</b>																	
Evansville-Henderson IN-KY MMSA	100.00	16	100.00	12.50	25.00	37.50	25.00	0	0	0	0	0	0	6.25	21.47	38.19	34.09

# Louisville-Jefferson County KY-IN MMSA

**Table 1. Lending Volume**

LENDING VOLUME		Geography: LOUISVILLE KY-IN MMSA				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015						
Assessment Area (2015):	% 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)	
<b>Full Review:</b>												
Louisville-Jefferson County KY-IN MMSA	100.00	316	59,805	176	45,681	2	136	2	22,189	496	127,811	100.00

\* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2013 to December 31, 2015.

\*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or bank, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: LOUISVILLE KY-IN MMSA					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015									
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	Over all	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Louisville-Jefferson County KY-IN MMSA	90	100.00	6.98	4.44	14.59	11.11	43.02	42.22	35.41	42.22	0.26	0.25	0.26	0.26	0.26	

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: LOUISVILLE KY-IN MMSA				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Louisville-Jefferson County KY-IN MMSA	57	100.00	6.98	0.00	14.59	35.09	43.02	33.33	35.41	31.58	1.49	0.00	3.82	1.25	1.04

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: LOUISVILLE KY-IN MMSA					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015									
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	
<b>Full Review:</b>																
Louisville-Jefferson County KY-IN MMSA	166	100.00	6.98	2.41	14.59	21.69	43.02	30.72	35.41	45.18	0.44	0.56	0.73	0.23	0.54	

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: LOUISVILLE KY-IN MMSA					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015									
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	
<b>Full Review:</b>																
Louisville-Jefferson County KY-IN MMSA	3	100.00	22.95	0.00	18.71	33.33	34.68	33.33	23.66	33.33	0.77	0.00	2.94	0.00	0.00	

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi-Family Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: LOUISVILLE KY-IN MMSA						Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015							
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Louisville-Jefferson County KY-IN MMSA	176	100.00	14.71	21.59	13.97	25.57	30.83	11.93	40.10	40.91	0.43	0.71	1.06	0.05	0.42

\* Based on 2015 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 (2015).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: LOUISVILLE KY-IN MMSA					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015								
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
<b>Full Review:</b>															
Louisville-Jefferson County KY-IN MMSA	2	100.00	5.87	0.00	18.11	100.00	38.25	0.00	37.62	0.00	1.32	0.00	3.13	0.00	0.00

\* Based on 2015 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 (2015).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: LOUISVILLE KY-IN MMSA						Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015							
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 9	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Louisville-Jefferson County KY-IN MMSA	90	100.00	23.26	12.94	17.62	21.18	19.91	17.65	39.21	48.24	0.29	0.26	0.20	0.32	0.34

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 5.6% of loans originated and purchased by bank.

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

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: LOUISVILLE KY-IN MMSA				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015					Market Share*				
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 <sup>10</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****					
<b>Full Review:</b>															
Louisville-Jefferson County KY-IN MMSA	57	100.00	23.26	7.14	17.62	26.79	19.91	23.21	39.21	42.86	1.48	1.74	3.00	0.49	1.18

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.8% of loans originated and purchased by bank.

<sup>10</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: LOUISVILLE KY-IN MMSA				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015									
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 <sup>11</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Louisville-Jefferson County KY-IN MMSA	166	100.00	23.26	6.88	17.62	18.75	19.91	23.13	39.21	51.25	0.54	0.41	0.41	0.55	0.62

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.6% of loans originated and purchased by bank.

<sup>11</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: LOUISVILLE KY-IN MMSA			Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015				
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
<b>Full Review:</b>									
Louisville-Jefferson County KY-IN MMSA	176	100.00	75.94	32.95	43.18	21.02	35.80	0.43	0.29

\* Based on 2015 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 - 2015).

\*\*\*\* 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 19.32% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: LOUISVILLE KY-IN MMSA			Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Louisville-Jefferson County KY-IN MMSA	2	100.00	97.27	50.00	50.00	50.00	0.00	1.32	3.13

\* Based on 2015 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 - 2015).

\*\*\*\* 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 50.00% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: LOUISVILLE KY-IN MMSA				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Louisville-Jefferson County KY-IN MMSA	2	896	40	1,818	42	2,714	100.00	0	0

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\* '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 bank's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: LOUISVILLE KY-IN MMSA				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015									
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
<b>Full Review:</b>																	
Louisville-Jefferson County KY-IN MMSA	100.00	5	100.00	20.00	0.00	40.00	40.00	0	1	0	-1	0	0	13.58	16.78	39.71	29.94

## State of Illinois

### Table 1. Lending Volume

LENDING VOLUME												
Geography: ILLINOIS												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015												
Assessment Area (2015):	% 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)	
<b>Full Review:</b>												
IL Non-MSA	47.95	167	8,287	118	19,167	88	13,508	2	8,000	375	48,962	47.12
<b>Limited Review:</b>												
Carbondale-Marion IL MSA	25.45	149	9,506	50	7,597	0	0	0		199	17,103	29.38
Danville IL MSA	26.60	126	6,343	65	14,314	16	1,932	1	8,000	208	30,589	23.50

\* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2013 to December 31, 2015 for the IL Non-MSA and Danville IL MSA, and January 1, 2014 to December 31, 2015 for the Carbondale-Marion IL MSA.

\*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or bank, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
IL Non-MSA	36	43.37	0.48	0.00	17.62	16.67	78.86	75.00	3.04	8.33	1.49	0.00	0.67	1.68	1.37	
<b>Limited Review:</b>																
Danville IL MSA	22	26.51	2.49	0.00	22.63	9.09	52.33	36.36	22.55	54.55	1.55	0.00	1.64	1.12	2.27	
Carbondale-Marion IL MSA	25	30.12	1.47	0.00	16.50	32.00	56.07	36.00	25.95	32.00	0.71	0.00	0.97	0.47	0.97	

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
IL Non-MSA	97	41.81	0.48	0.00	17.62	22.68	78.86	76.29	3.04	1.03	11.32	0.00	21.05	10.37	0.00	
<b>Limited Review:</b>																
Danville IL MSA	73	31.47	2.49	5.48	22.63	12.33	52.33	36.99	22.55	45.21	11.85	33.33	11.43	6.31	20.34	
Carbondale-Marion IL MSA	62	26.72	1.47	3.23	16.50	11.29	56.07	59.68	25.95	25.81	7.89	0.00	4.76	7.08	10.91	

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
IL Non-MSA	34	26.77	0.48	0.00	17.62	11.76	78.86	85.29	3.04	2.94	1.44	0.00	1.28	1.58	0.00
<b>Limited Review:</b>															
Danville IL MSA	31	24.41	2.49	0.00	22.63	12.90	52.33	48.39	22.55	38.71	2.98	0.00	4.05	1.85	4.92
Carbondale-Marion IL MSA	62	48.82	1.47	3.23	16.50	14.52	56.07	54.84	25.95	27.42	2.54	11.11	1.00	3.18	1.63

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY															Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
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									
<b>Full Review:</b>																								
IL Non-MSA	0	0.00	7.32	0.00	19.41	0.00	71.94	0.00	1.34	0.00	0.00	0.00	0.00	0.00	0.00									
<b>Limited Review:</b>																								
Danville IL MSA	0	0.00	18.74	0.00	39.31	0.00	18.59	0.00	23.36	0.00	0.00	0.00	0.00	0.00	0.00									
Carbondale-Marion IL MSA	0	0.00	12.59	0.00	63.39	0.00	15.82	0.00	8.21	0.00	0.00	0.00	0.00	0.00	0.00									

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi-Family Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
IL Non-MSA	118	50.64	4.69	3.39	17.46	9.32	74.05	85.59	3.80	1.69	3.16	1.79	1.11	3.93	2.94									
<b>Limited Review:</b>																								
Danville IL MSA	65	27.90	3.12	10.77	32.90	40.00	44.43	29.23	19.55	20.00	5.03	14.29	5.59	3.70	5.38									
Carbondale-Marion IL MSA	50	21.46	2.72	4.00	41.33	26.00	36.17	42.00	19.77	28.00	1.24	0.00	0.52	1.82	1.70									

\* Based on 2015 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 (2015).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
IL Non-MSA	88	84.62	0.00	0.00	5.16	4.55	94.38	95.45	0.46	0.00	14.18	0.00	14.29	14.29	0.00	
<b>Limited Review:</b>																
Danville IL MSA	16	15.38	0.00	0.00	8.20	0.00	78.69	93.75	13.11	6.25	3.50	0.00	0.00	4.31	0.00	
Carbondale-Marion IL MSA	0	0.00	2.24	0.00	10.45	0.00	69.90	0.00	17.41	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2015 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 (2015).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
IL Non-MSA	36	43.37	22.75	11.43	19.90	20.00	22.37	31.43	34.98	37.14	1.80	2.63	0.89	1.87	2.28	
<b>Limited Review:</b>																
Danville IL MSA	22	26.51	21.15	0.00	17.70	30.00	21.00	15.00	40.15	55.00	1.99	0.00	2.78	1.32	2.53	
Carbondale-Marion IL MSA	25	30.12	22.29	0.00	16.51	25.00	20.00	16.67	41.20	58.33	0.82	0.00	1.46	0.34	0.94	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.8% of loans originated and purchased by bank. 12 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share*				
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 <sup>13</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
IL Non-MSA	97	41.81	22.75	10.64	19.90	22.34	22.37	32.98	34.98	34.04	11.41	15.79	18.18	7.69	8.45	
<b>Limited Review:</b>																
Danville IL MSA	73	31.47	21.15	13.70	17.70	13.70	21.00	35.62	40.15	36.99	12.32	17.65	0.00	13.46	14.02	
Carbondale-Marion IL MSA	62	26.72	22.29	13.11	16.51	19.67	20.00	27.87	41.20	39.34	8.11	23.08	6.06	14.29	3.33	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

<sup>13</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015									
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 <sup>14</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
IL Non-MSA	34	26.77	22.75	6.45	19.90	22.58	22.37	19.35	34.98	51.61	1.28	0.00	1.05	2.04	1.19	
<b>Limited Review:</b>																
Danville IL MSA	31	24.41	21.15	6.45	17.70	22.58	21.00	19.35	40.15	51.61	3.40	3.23	3.80	4.67	2.56	
Carbondale-Marion IL MSA	62	48.82	22.29	5.08	16.51	23.73	20.00	23.73	41.20	47.46	2.93	0.00	7.07	2.47	2.43	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.7% of loans originated and purchased by bank.

<sup>14</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
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
<b>Full Review:</b>									
IL Non-MSA	118	50.64	73.06	44.07	61.02	19.49	19.49	3.16	3.33
<b>Limited Review:</b>									
Danville IL MSA	65	27.90	72.76	47.69	63.08	10.77	26.15	5.03	5.60
Carbondale-Marion IL MSA	50	21.46	73.63	56.00	62.00	18.00	20.00	1.24	1.83

\* Based on 2015 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 - 2015).

\*\*\*\* 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 6.87% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: ILLINOIS			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
IL Non-MSA	88	84.62	99.20	79.55	57.95	20.45	21.59	14.18	16.84
<b>Limited Review:</b>									
Danville IL MSA	16	15.38	99.59	87.50	68.75	6.25	25.00	3.50	4.55
Carbondale-Marion IL MSA	0	0.00	98.01	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2015 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&amp;B - 2015).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 1.92% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
IL Non-MSA	0	0	31	396	31	396	24.44	0	0
<b>Limited Review:</b>									
Carbondale-Marion IL MSA***	0	0	0	0	0	0	0.00	0	0
Danville IL MSA	0	0	14	1,224	14	1,224	75.56	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 bank's financial reporting system.

\*\*\* The evaluation period for Investments is from January 01, 2014 to December 31, 2015 for the AA.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015									
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
<b>Full Review:</b>																	
IL Non-MSA	47.12	1	33.33	0.00	0.00	100.0	0.00	0	0	0	0	0	0	1.17	19.34	77.04	2.45
<b>Limited Review:</b>																	
Carbondale-Marion IL MSA	29.38	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	5.55	24.02	49.06	21.37
Danville IL MSA	23.50	2	66.67	0.00	50.00	0.00	50.00	0	0	0	0	0	0	4.35	28.26	48.27	19.12

# State of Indiana

## Table 1. Lending Volume

LENDING VOLUME		Geography: INDIANA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Indianapolis-Carmel-Anderson IN MSA	22.08	897	119,499	891	189,560	18	3,073	15	39,843	1,821	351,975	19.50
Terre Haute IN MSA	8.16	454	26,752	202	32,933	15	2,522	2	5,078	673	67,285	7.18
<b>Limited Review:</b>												
Anderson IN MSA^	2.56	104	8,350	30	3,612	3	551	0	0	137	12,513	0.00
Bloomington IN MSA	6.17	318	53,723	186	37,364	4	493	1	640	509	92,220	12.70
Columbus IN MSA	2.53	150	22,126	56	11,086	3	403	0	-	209	33,615	3.71
Elkhart-Goshen IN MSA	1.93	58	6,206	101	24,548	0	0	0	-	159	30,754	1.27
Ft Wayne IN MSA	4.62	105	14,211	272	52,923	3	53	1	10,000	381	77,187	8.75
IN Non-MSA	40.62	1,437	109,073	967	111,240	935	109,959	11	23,936	3,350	354,208	33.74
Lafayette-West Lafayette IN MSA	5.09	274	49,636	132	18,251	11	1,313	3	7,350	420	76,550	6.51
Muncie IN MSA	5.14	248	19,465	134	20,633	38	3,703	4	17,420	424	61,221	4.09
South Bend-Mishawaka IN MSA	3.65	145	23,193	156	32,764	0	0	0	-	301	55,957	2.54

\* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2013 to December 31, 2015, and January 01, 2013 to December 31, 2013 for the Anderson IN MSA.

\*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or bank, as appropriate.

^ The evaluation period for the MSA is January 1, 2013 to December 31, 2013.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: INDIANA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Indianapolis-Carmel-Anderson IN MSA	320	23.95	5.47	6.56	18.68	19.38	39.48	33.75	36.37	40.31	0.40	1.07	0.51	0.44	0.32	
Terre Haute IN MSA	96	7.19	6.79	6.25	17.68	20.83	45.61	35.42	29.92	37.50	2.60	3.77	4.43	2.14	2.38	
<b>Limited Review:</b>																
Anderson IN MSA^	13	2.04	1.04	0.00	17.60	0.00	53.57	61.54	27.80	38.46	0.90	0.00	0.00	0.90	1.07	
Bloomington IN MSA	141	10.55	2.46	1.42	11.88	18.44	51.77	41.13	33.89	39.01	2.76	2.00	4.03	2.24	3.04	
Columbus IN MSA	56	4.19	0.00	0.00	9.60	3.57	71.07	71.43	19.33	25.00	1.79	0.00	0.00	1.77	2.52	
Elkhart-Goshen IN MSA	11	0.82	0.00	0.00	13.11	9.09	55.62	36.36	31.27	54.55	0.23	0.00	0.00	0.19	0.35	
Ft Wayne IN MSA	37	2.77	5.52	2.70	21.92	13.51	37.27	21.62	35.29	62.16	0.30	0.93	0.26	0.13	0.44	
IN Non-MSA	436	32.63	0.00	0.00	12.63	9.17	69.97	63.76	17.40	27.06	2.52	0.00	2.38	2.31	3.23	
Lafayette-West Lafayette IN MSA	113	8.46	0.88	0.88	23.59	10.62	51.10	57.52	24.43	30.97	2.49	0.00	0.97	2.69	3.35	
Muncie IN MSA	83	6.21	1.33	0.00	27.03	10.84	38.21	33.73	33.43	55.42	3.46	0.00	1.99	3.22	4.09	
South Bend-Mishawaka IN MSA	43	3.22	2.22	0.00	21.95	16.28	37.41	23.26	38.43	60.47	0.49	0.00	0.30	0.56	0.52	

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

^ The evaluation period for the MSA is January 1, 2013 to December 31, 2013.

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: INDIANA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Indianapolis-Carmel-Anderson IN MSA	260	19.46	5.47	1.92	18.68	15.38	39.48	45.77	36.37	36.92	4.58	2.94	8.86	4.58	3.33	
Terre Haute IN MSA	205	15.34	6.79	7.32	17.68	14.63	45.61	50.73	29.92	27.32	29.21	18.18	25.93	29.79	33.78	
<b>Limited Review:</b>																
Anderson IN MSA^	18	3.10	1.04	0.00	17.60	0.00	53.57	66.67	27.80	33.33	8.87	0.00	0.00	11.54	8.70	
Bloomington IN MSA	62	4.64	2.46	3.23	11.88	9.68	51.77	53.23	33.89	33.87	7.88	0.00	13.04	8.40	6.45	
Columbus IN MSA	27	2.02	0.00	0.00	9.60	11.11	71.07	74.07	19.33	14.81	4.92	0.00	5.26	7.34	0.00	
Elkhart-Goshen IN MSA	18	1.35	0.00	0.00	13.11	16.67	55.62	61.11	31.27	22.22	3.94	0.00	4.55	6.19	1.19	
Ft Wayne IN MSA	25	1.87	5.52	0.00	21.92	16.00	37.27	36.00	35.29	48.00	1.36	0.00	0.00	1.52	2.17	
IN Non-MSA	590	44.16	0.00	0.00	12.63	13.39	69.97	73.39	17.40	13.22	16.08	0.00	20.24	15.30	16.92	
Lafayette-West Lafayette IN MSA	49	3.67	0.88	0.00	23.59	16.33	51.10	67.35	24.43	16.33	10.00	0.00	9.26	10.94	9.62	
Muncie IN MSA	72	5.39	1.33	1.39	27.03	20.83	38.21	40.28	33.43	37.50	16.88	50.00	18.18	13.89	18.87	
South Bend-Mishawaka IN MSA	28	2.10	2.22	3.57	21.95	17.86	37.41	17.86	38.43	60.71	2.57	16.67	1.72	0.81	3.70	

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

^ The evaluation period for the MSA is January 1, 2013 to December 31, 2013.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: INDIANA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Indianapolis-Carmel-Anderson IN MSA	312	22.41	5.47	0.32	18.68	10.90	39.48	41.67	36.37	47.12	0.63	0.22	0.60	0.72	0.60	
Terre Haute IN MSA	153	10.99	6.79	3.92	17.68	15.69	45.61	52.29	29.92	28.10	8.45	8.00	9.46	10.62	5.52	
<b>Limited Review:</b>																
Anderson IN MSA^	73	3.68	1.04	0.00	17.60	4.11	53.57	64.38	27.80	31.51	3.32	0.00	1.33	3.86	3.09	
Bloomington IN MSA	112	8.05	2.46	1.79	11.88	6.25	51.77	50.89	33.89	41.07	4.30	0.00	2.72	4.17	5.26	
Columbus IN MSA	67	4.81	0.00	0.00	9.60	7.46	71.07	59.70	19.33	32.84	2.33	0.00	1.20	2.42	2.47	
Elkhart-Goshen IN MSA	29	2.08	0.00	0.00	13.11	24.14	55.62	44.83	31.27	31.03	0.65	0.00	1.56	0.39	0.79	
Ft Wayne IN MSA	42	3.02	5.52	0.00	21.92	7.14	37.27	26.19	35.29	66.67	0.66	0.00	0.34	0.52	0.90	
IN Non-MSA	409	29.38	0.00	0.00	12.63	9.78	69.97	68.95	17.40	21.27	3.76	0.00	2.90	3.53	4.96	
Lafayette-West Lafayette IN MSA	102	7.33	0.88	0.98	23.59	20.59	51.10	50.98	24.43	27.45	4.03	0.00	4.32	3.76	4.58	
Muncie IN MSA	92	6.61	1.33	1.09	27.03	16.30	38.21	41.30	33.43	41.30	5.01	0.00	6.25	4.48	5.15	
South Bend-Mishawaka IN MSA	74	5.32	2.22	1.35	21.95	17.57	37.41	33.78	38.43	47.30	1.36	4.35	1.86	1.14	1.34	

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

^ The evaluation period for the MSA is January 1, 2013 to December 31, 2013.

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: INDIANA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Indianapolis-Carmel-Anderson IN MSA	5	22.73	12.89	20.00	40.72	40.00	30.79	40.00	15.60	0.00	2.75	7.69	2.56	2.44	0.00	
Terre Haute IN MSA	0	0.00	31.41	0.00	14.02	0.00	30.63	0.00	23.94	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Anderson IN MSA^	0	0.00	2.16	0.00	24.51	0.00	64.82	0.00	8.50	0.00	0.00	0.00	0.00	0.00	0.00	
Bloomington IN MSA	3	13.64	16.91	33.33	25.54	0.00	33.60	66.67	23.94	0.00	3.85	0.00	0.00	7.69	0.00	
Columbus IN MSA	0	0.00	0.00	0.00	31.05	0.00	49.28	0.00	19.68	0.00	0.00	0.00	0.00	0.00	0.00	
Elkhart-Goshen IN MSA	0	0.00	0.00	0.00	25.73	0.00	69.00	0.00	5.27	0.00	0.00	0.00	0.00	0.00	0.00	
Ft Wayne IN MSA	1	4.55	10.63	0.00	54.92	100.00	23.10	0.00	11.34	0.00	6.67	0.00	12.50	0.00	0.00	
IN Non-MSA	2	9.09	0.00	0.00	30.41	0.00	55.00	50.00	14.59	50.00	6.45	0.00	0.00	4.35	20.00	
Lafayette-West Lafayette IN MSA	10	45.45	18.39	30.00	41.01	50.00	23.66	20.00	16.93	0.00	10.91	11.54	13.64	0.00	0.00	
Muncie IN MSA	1	4.55	6.63	0.00	23.42	0.00	54.39	100.00	15.56	0.00	0.00	0.00	0.00	0.00	0.00	
South Bend-Mishawaka IN MSA	0	0.00	8.23	0.00	47.06	0.00	34.23	0.00	10.49	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi-Family Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

^ The evaluation period for the MSA is January 1, 2013 to December 31, 2013.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: INDIANA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans						
<b>Full Review:</b>																
Indianapolis-Carmel-Anderson IN MSA	891	28.83	5.53	6.96	19.47	19.08	38.93	33.56	36.04	40.40	1.75	2.13	1.88	1.46	1.91	
Terre Haute IN MSA	202	6.54	19.96	25.74	14.93	12.38	40.11	39.60	24.99	22.28	8.04	9.40	6.98	9.61	5.70	
<b>Limited Review:</b>																
Anderson IN MSA^	30	1.90	1.66	0.00	25.58	13.33	47.65	66.67	25.02	20.00	2.60	0.00	1.51	3.60	2.08	
Bloomington IN MSA	186	6.02	7.44	7.53	12.94	18.82	50.66	47.85	28.96	25.81	5.27	4.00	9.13	4.66	5.15	
Columbus IN MSA	56	1.81	0.00	0.00	25.89	33.93	56.56	58.93	17.55	7.14	2.63	0.00	3.67	2.76	1.12	
Elkhart-Goshen IN MSA	101	3.27	0.00	0.00	17.23	16.83	55.32	54.46	27.45	28.71	1.78	0.00	1.69	2.04	1.49	
Ft Wayne IN MSA	270	8.74	10.38	22.96	25.19	21.11	32.61	27.04	31.42	28.89	2.77	6.58	2.49	2.08	2.55	
IN Non-MSA	967	31.28	0.00	0.00	15.73	13.96	66.19	68.36	18.08	17.68	5.64	0.00	5.91	5.87	5.45	
Lafayette-West Lafayette IN MSA	132	4.27	6.02	1.52	40.05	42.42	34.27	43.18	19.07	12.88	0.00	0.00	0.00	0.00	0.00	
Muncie IN MSA	130	4.21	2.73	3.85	31.82	35.38	39.38	37.69	23.97	23.08	5.77	7.14	5.69	5.88	5.69	
South Bend-Mishawaka IN MSA	156	5.05	7.84	7.69	24.63	16.67	34.75	48.08	32.77	27.56	1.99	2.70	1.23	2.81	1.62	

\* Based on 2015 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 (2015).

^ The evaluation period for the MSA is January 1, 2013 to December 31, 2013.

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: INDIANA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
Indianapolis-Carmel-Anderson IN MSA	18	1.75	2.42	0.00	11.53	11.11	51.60	66.67	34.43	22.22	1.89	0.00	10.00	2.06	0.91	
Terre Haute IN MSA	15	1.46	1.94	0.00	4.99	0.00	55.40	86.67	37.67	13.33	4.48	0.00	0.00	6.49	1.96	
<b>Limited Review:</b>																
Anderson IN MSA^	3	0.54	0.53	0.00	5.30	0.00	55.48	0.00	38.69	100.00	6.12	0.00	0.00	0.00	10.71	
Bloomington IN MSA	4	0.39	1.83	0.00	3.66	25.00	74.73	75.00	19.78	0.00	13.33	0.00	0.00	18.18	0.00	
Columbus IN MSA	3	0.29	0.00	0.00	4.88	0.00	84.15	100.00	10.98	0.00	3.51	0.00	0.00	3.70	0.00	
Elkhart-Goshen IN MSA	0	0.00	0.00	0.00	3.69	0.00	46.62	0.00	49.69	0.00	0.00	0.00	0.00	0.00	0.00	
Ft Wayne IN MSA	3	0.29	2.75	0.00	11.23	0.00	45.70	100.00	40.32	0.00	1.46	0.00	0.00	2.44	0.00	
IN Non-MSA	935	91.04	0.00	0.00	3.91	3.21	75.86	82.57	20.23	14.22	23.38	0.00	33.33	23.58	21.99	
Lafayette-West Lafayette IN MSA	11	1.07	0.75	0.00	10.53	9.09	74.81	72.73	13.91	18.18	0.00	0.00	0.00	0.00	0.00	
Muncie IN MSA	38	3.70	0.61	0.00	8.59	0.00	56.75	47.37	34.05	52.63	18.68	0.00	0.00	15.00	25.81	
South Bend-Mishawaka IN MSA	0	0.00	1.29	0.00	9.02	0.00	45.86	0.00	43.83	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2015 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 (2015).

^ The evaluation period for the MSA is January 1, 2013 to December 31, 2013.

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: INDIANA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share*				
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 15	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Indianapolis-Carmel-Anderson IN MSA	320	23.95	21.67	20.39	17.24	20.00	20.38	16.47	40.71	43.14	0.46	1.07	0.37	0.25	0.44	
Terre Haute IN MSA	96	7.19	22.09	6.67	18.63	22.22	18.74	23.33	40.54	47.78	2.85	0.00	4.12	1.75	3.53	
<b>Limited Review:</b>																
Anderson IN MSA^	13	2.04	18.44	0.00	19.00	38.46	22.60	30.77	39.96	30.77	1.13	0.00	1.48	1.24	1.21	
Bloomington IN MSA	141	10.55	20.06	8.82	16.27	23.53	19.96	21.32	43.70	46.32	3.30	2.54	2.94	2.87	3.78	
Columbus IN MSA	56	4.19	18.65	12.73	19.27	27.27	23.45	23.64	38.63	36.36	1.99	2.68	1.88	1.30	2.24	
Elkhart-Goshen IN MSA	11	0.82	17.81	0.00	19.19	20.00	22.78	20.00	40.22	60.00	0.23	0.00	0.00	0.24	0.44	
Ft Wayne IN MSA	37	2.77	19.54	10.34	18.49	10.34	22.62	20.69	39.35	58.62	0.26	0.22	0.00	0.27	0.52	
IN Non-MSA	436	32.63	18.18	9.95	19.24	31.75	23.22	24.41	39.36	33.89	3.09	2.71	2.96	3.27	3.22	
Lafayette-West Lafayette IN MSA	113	8.46	21.86	5.56	17.19	21.30	21.12	23.15	39.82	50.00	2.80	1.42	2.48	2.22	3.83	
Muncie IN MSA	83	6.21	20.23	14.63	19.01	21.95	21.73	19.51	39.03	43.90	4.27	8.24	3.28	2.68	4.95	
South Bend-Mishawaka IN MSA	43	3.22	20.35	2.50	18.06	5.00	20.94	15.00	40.65	77.50	0.57	0.27	0.00	0.45	1.22	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 8.2% of loans originated and purchased by bank.

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

^ The evaluation period for the MSA is January 1, 2013 to December 31, 2013.

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: INDIANA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share*				
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****	% Families16	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Indianapolis-Carmel-Anderson IN MSA	260	19.46	21.67	11.90	17.24	19.05	20.38	26.98	40.71	42.06	4.57	7.37	4.69	4.75	3.87	
Terre Haute IN MSA	205	15.34	22.09	8.50	18.63	19.00	18.74	29.00	40.54	43.50	30.26	28.57	25.81	33.33	31.00	
<b>Limited Review:</b>																
Anderson IN MSA^	18	3.10	18.44	5.56	19.00	16.67	22.60	33.33	39.96	44.44	9.05	6.67	6.67	10.71	9.64	
Bloomington IN MSA	62	4.64	20.06	3.45	16.27	25.86	19.96	24.14	43.70	46.55	8.48	0.00	6.38	13.95	8.47	
Columbus IN MSA	27	2.02	18.65	33.33	19.27	25.93	23.45	18.52	38.63	22.22	4.95	13.33	6.06	2.94	2.35	
Elkhart-Goshen IN MSA	18	1.35	17.81	16.67	19.19	27.78	22.78	11.11	40.22	44.44	4.21	7.69	7.89	4.55	2.11	
Fi Wayne IN MSA	25	1.87	19.54	4.17	18.49	33.33	22.62	25.00	39.35	37.50	1.26	1.23	1.86	1.14	0.92	
IN Non-MSA	590	44.16	18.18	14.16	19.24	23.83	23.22	26.42	39.36	35.58	16.43	20.44	16.56	15.89	15.41	
Lafayette-West Lafayette IN MSA	49	3.67	21.86	8.89	17.19	22.22	21.12	28.89	39.82	40.00	9.91	5.26	11.86	13.73	7.53	
Muncie IN MSA	72	5.39	20.23	7.46	19.01	22.39	21.73	32.84	39.03	37.31	16.11	7.69	14.29	20.51	15.94	
South Bend-Mishawaka IN MSA	28	2.10	20.35	3.57	18.06	14.29	20.94	32.14	40.65	50.00	2.78	2.00	0.00	4.71	3.31	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.8% of loans originated and purchased by bank.

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

^ The evaluation period for the MSA is January 1, 2013 to December 31, 2013.

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: INDIANA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families*	% BANK Loans****	% Families <sup>17</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Indianapolis-Carmel-Anderson IN MSA	312	22.41	21.67	5.42	17.24	21.36	20.38	24.07	40.71	49.15	0.80	0.48	0.92	0.78	0.82	
Terre Haute IN MSA	153	10.99	22.09	9.03	18.63	14.58	18.74	31.25	40.54	45.14	9.78	6.67	10.26	12.38	8.24	
<b>Limited Review:</b>																
Anderson IN MSA <sup>^</sup>	73	3.68	18.44	4.55	19.00	22.73	22.60	24.24	39.96	48.48	3.83	1.53	4.10	3.48	4.55	
Bloomington IN MSA	112	8.05	20.06	9.17	16.27	21.10	19.96	20.18	43.70	49.54	5.16	4.60	5.69	4.07	5.51	
Columbus IN MSA	67	4.81	18.65	12.12	19.27	13.64	23.45	21.21	38.63	53.03	2.85	4.82	0.56	3.31	3.24	
Elkhart-Goshen IN MSA	29	2.08	17.81	0.00	19.19	17.86	22.78	25.00	40.22	57.14	0.73	0.00	0.00	0.43	1.31	
Ft Wayne IN MSA	42	3.02	19.54	2.86	18.49	22.86	22.62	28.57	39.35	45.71	0.79	0.34	1.00	0.62	0.89	
IN Non-MSA	409	29.38	18.18	11.36	19.24	21.97	23.22	23.74	39.36	42.93	4.55	5.26	4.74	3.45	4.97	
Lafayette-West Lafayette IN MSA	102	7.33	21.86	10.89	17.19	19.80	21.12	20.79	39.82	48.51	5.21	6.52	3.65	3.64	6.53	
Muncie IN MSA	92	6.61	20.23	11.36	19.01	19.32	21.73	18.18	39.03	51.14	5.81	5.66	5.93	4.66	6.43	
South Bend-Mishawaka IN MSA	74	5.32	20.35	2.74	18.06	26.03	20.94	30.14	40.65	41.10	1.73	0.63	2.23	1.77	1.66	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.1% of loans originated and purchased by bank.

<sup>17</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

<sup>^</sup> The evaluation period for the MSA is January 1, 2013 to December 31, 2013.

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: INDIANA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
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
<b>Full Review:</b>									
Indianapolis-Carmel-Anderson IN MSA	891	28.77	76.62	51.40	50.17	20.76	29.07	1.75	2.21
Terre Haute IN MSA	202	6.52	73.90	57.43	59.41	21.78	18.81	8.04	10.88
<b>Limited Review:</b>									
Anderson IN MSA^	30	1.90	72.37	70.00	70.00	13.33	16.67	2.60	3.79
Bloomington IN MSA	186	6.01	77.20	58.60	52.69	22.58	24.73	5.27	7.14
Columbus IN MSA	56	1.81	73.80	44.64	46.43	26.79	26.79	2.63	3.17
Elkhart-Goshen IN MSA	101	3.26	74.26	32.67	42.57	22.77	34.65	1.78	1.42
Ft Wayne IN MSA	272	8.78	75.37	45.96	51.47	26.10	22.43	2.77	3.13
IN Non-MSA	967	31.22	77.12	61.12	72.91	16.44	10.65	5.64	7.40
Lafayette-West Lafayette IN MSA	132	4.26	75.38	62.88	59.09	26.52	14.39	0.00	0.00
Muncie IN MSA	134	4.33	74.67	67.91	67.16	14.93	17.91	5.77	9.98
South Bend-Mishawaka IN MSA	156	5.04	74.40	47.44	51.92	21.15	26.92	1.99	1.82

\* Based on 2015 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 - 2015).

\*\*\*\* 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 5.04% of small loans to businesses originated and purchased by the bank.

^ The evaluation period for the MSA is January 1, 2013 to December 31, 2013.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: INDIANA			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Indianapolis-Carmel-Anderson IN MSA	18	1.75	97.16	100.00	55.56	27.78	16.67	1.89	3.90
Terre Haute IN MSA	15	1.46	98.34	73.33	33.33	53.33	13.33	4.48	3.96
<b>Limited Review:</b>									
Anderson IN MSA^	3	0.54	99.29	100.00	66.67	0.00	33.33	6.12	8.11
Bloomington IN MSA	4	0.39	97.80	100.00	50.00	50.00	0.00	13.33	18.18
Columbus IN MSA	3	0.29	97.87	100.00	66.67	33.33	0.00	3.51	8.00
Elkhart-Goshen IN MSA	0	0.00	98.77	0.00	0.00	0.00	0.00	0.00	0.00
Ft Wayne IN MSA	3	0.29	97.82	100.00	100.00	0.00	0.00	1.46	2.44
IN Non-MSA	935	91.04	98.63	86.42	63.10	23.42	13.48	23.38	30.95
Lafayette-West Lafayette IN MSA	11	1.07	98.12	72.73	63.64	27.27	9.09	0.00	0.00
Muncie IN MSA	38	3.70	97.85	97.37	76.32	18.42	5.26	18.68	28.81
South Bend-Mishawaka IN MSA	0	0.00	97.24	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2015 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 - 2015).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 1.17% of small loans to farms originated and purchased by the bank.

^ The evaluation period for the MSA is January 1, 2013 to December 31, 2013.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: INDIANA		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Indianapolis-Carmel-Anderson IN MSA	0	0	164	22,550	164	22,550	32.52	0	0
Terre Haute IN MSA	0	0	35	2,960	35	2,960	4.27	0	0
<b>Limited Review:</b>									
Anderson IN MSA^	0	0	0	0	0	0	0.00	0	0
Bloomington IN MSA	0	0	47	2,911	47	2,911	4.20	0	0
Columbus IN MSA	0	0	15	2,130	15	2,130	3.07	0	0
Elkhart-Goshen IN MSA	0	0	29	2,585	29	2,585	3.73	0	0
Ft Wayne IN MSA	0	0	54	13,657	54	13,657	19.70	0	0
IN Non-MSA	0	0	207	17,806	207	17,806	25.08	0	0
Lafayette-West Lafayette IN MSA	0	0	30	807	30	807	1.16	0	0
Muncie IN MSA	0	0	41	1,851	41	1,851	2.467	0	0
South Bend-Mishawaka IN MSA	0	0	20	1,717	20	1,717	2.48	0	0
IN Statewide			1	353	1	353	51		

\* '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 bank's financial reporting system.

^ The evaluation period for the MSA is January 1, 2013 to December 31, 2013.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: INDIANA				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015									
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
<b>Full Review:</b>																	
Indianapolis-Carmel-Anderson IN MSA	19.50	25	26.89	0.00	28.00	28.00	44.00	1	18	-1	-6	-5	-5	8.61	23.74	36.19	31.25
Terre Haute IN MSA	7.18	6	6.45	16.67	50.00	33.33	0.00	0	0	0	0	0	0	14.32	17.48	41.77	26.43
<b>Limited Review:</b>																	
Anderson IN MSA <sup>^</sup>	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	1.54	21.44	51.48	22.95
Bloomington IN MSA	12.70	6	6.45	0.00	16.67	50.00	33.33	0	2	0	0	-2	0	16.38	14.47	42.41	26.74
Columbus IN MSA	3.71	5	5.38	0.00	40.00	40.00	20.00	0	1	0	0	-1	0	0.00	15.52	67.10	17.38
Elkhart-Goshen IN MSA	1.27	1	1.07	0.00	100.0	0.00	0.00	0	1	0	0	-1	0	0.00	17.02	53.84	29.14
Ft Wayne IN MSA	8.75	6	6.45	0.00	33.33	33.33	33.33	0	2	0	0	0	-2	9.04	26.61	33.35	30.82
IN Non-MSA	33.74	28	30.10	0.00	28.57	57.14	14.29	0	7	0	-1	-4	-2	0.00	16.11	67.63	16.25
Lafayette-West Lafayette IN MSA	6.51	5	5.38	0.00	60.00	20.00	20.00	0	3	0	0	-1	-2	7.42	26.27	41.93	18.51
Muncie IN MSA	4.09	6	6.45	0.00	50.00	33.33	16.67	0	0	0	0	0	0	3.09	26.00	38.49	26.59
South Bend-Mishawaka IN MSA	2.54	5	5.38	20.00	20.00	20.00	40.00	0	1	0	-1	0	0	4.59	27.75	36.27	31.40

<sup>^</sup> The evaluation period for the MSA is January 1, 2013 to December 31, 2013.

# State of Kentucky

## Table 1. Lending Volume

LENDING VOLUME												
Geography: KENTUCKY												
Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015												
Assessment Area (2015):	% 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)	
<b>Full Review:</b>												
Kentucky Non-MSA	67.38	816	48,088	325	44,988	116	12,325	1	1,006	1,258	106,407	83.66
<b>Limited Review:</b>												
Owensboro KY MSA	32.62	443	45,269	146	18,300	18	919	2	1,002	609	65,490	16.34

\* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2013 to December 31, 2015.

\*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or bank, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: KENTUCKY					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015									
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	Over all	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Kentucky Non-MSA	90	32.61	0.00	0.00	8.46	6.67	61.22	50.00	30.32	43.33	3.05	0.00	1.32	3.53	2.74	
<b>Limited Review:</b>																
Owensboro KY MSA	186	67.39	2.61	1.08	8.19	7.53	65.25	55.91	23.94	35.48	4.05	6.06	3.14	3.93	4.53	

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: KENTUCKY					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Kentucky Non-MSA	402	79.76	0.00	0.00	8.46	7.21	61.22	68.41	30.32	24.38	53.16	0.00	37.50	58.26	49.02	
<b>Limited Review:</b>																
Owensboro KY MSA	102	20.24	2.61	4.90	8.19	7.84	65.25	65.69	23.94	21.57	20.75	14.29	30.77	24.47	11.11	

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: KENTUCKY				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Kentucky Non-MSA	324	67.78	0.00	0.00	8.46	3.40	61.22	67.59	30.32	29.01	10.41	0.00	0.00	13.51	8.61
<b>Limited Review:</b>															
Owensboro KY MSA	154	32.22	2.61	0.65	8.19	7.79	65.25	64.29	23.94	27.27	4.37	0.00	4.35	4.07	5.39

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: KENTUCKY					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015									
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	
<b>Full Review:</b>																
Kentucky Non-MSA	0	0.00	0.00	0.00	25.37	0.00	38.96	0.00	35.66	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Owensboro KY MSA	1	100.00	11.39	0.00	13.14	0.00	60.93	100.00	14.54	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi-Family Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: KENTUCKY					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans						
<b>Full Review:</b>																
Kentucky Non-MSA	325	69.00	0.00	0.00	16.64	13.23	54.07	60.92	29.29	25.85	12.13	0.00	10.64	14.52	10.23	
<b>Limited Review:</b>																
Owensboro KY MSA	146	31.00	11.22	10.27	10.75	8.90	54.53	52.05	23.50	28.77	3.99	4.58	2.96	3.23	6.75	

\* Based on 2015 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 (2015).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: KENTUCKY					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015									
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	
<b>Full Review:</b>																
Kentucky Non-MSA	116	86.57	0.00	0.00	3.00	2.59	56.58	69.83	40.42	27.59	22.09	0.00	12.50	28.57	15.49	
<b>Limited Review:</b>																
Owensboro KY MSA	18	13.43	1.12	0.00	2.47	0.00	71.46	94.44	24.94	5.56	1.88	0.00	0.00	2.19	0.00	

\* Based on 2015 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 (2015).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: KENTUCKY					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015									
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 18	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Kentucky Non-MSA	90	32.61	17.66	4.82	16.40	15.66	20.60	27.71	45.34	51.81	3.36	3.45	0.67	3.56	4.50	
<b>Limited Review:</b>																
Owensboro KY MSA	186	67.39	20.33	12.05	16.13	24.70	24.01	19.28	39.54	43.98	4.65	5.41	5.34	4.20	4.28	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 9.8% of loans originated and purchased by bank. 18 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: KENTUCKY					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015					Market Share*				
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****	% Families19	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Kentucky Non-MSA	402	79.76	17.66	8.88	16.40	16.75	20.60	23.86	45.34	50.51	53.01	44.44	55.56	48.72	55.56	
<b>Limited Review:</b>																
Owensboro KY MSA	102	20.24	20.33	7.22	16.13	20.62	24.01	28.87	39.54	43.30	20.69	18.75	25.00	23.68	17.91	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.6% of loans originated and purchased by bank.

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

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: KENTUCKY					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families*	% BANK Loans****	% Families <sup>20</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Kentucky Non-MSA	324	67.78	17.66	3.82	16.40	13.38	20.60	21.34	45.34	61.46	11.58	9.52	14.58	8.74	12.27	
<b>Limited Review:</b>																
Owensboro KY MSA	154	32.22	20.33	9.40	16.13	20.13	24.01	19.46	39.54	51.01	5.57	7.14	5.34	3.70	6.35	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.1% of loans originated and purchased by bank. <sup>20</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: KENTUCKY					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015				
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
<b>Full Review:</b>									
Kentucky Non-MSA	325	69.00	74.62	54.77	69.85	16.31	13.85	12.13	16.17
<b>Limited Review:</b>									
Owensboro KY MSA	146	31.00	74.27	39.73	65.07	21.92	13.01	3.99	2.98

\* Based on 2015 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 - 2015).

\*\*\*\* 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 18.47% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: KENTUCKY			Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Kentucky Non-MSA	116	86.57	98.85	81.90	61.21	32.76	6.03	22.09	30.12
<b>Limited Review:</b>									
Owensboro KY MSA	18	13.43	99.33	100.00	83.33	16.67	0.00	1.88	2.84

\* Based on 2015 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 - 2015).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.75% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: KENTUCKY			Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Kentucky Non-MSA	0	0	41	3,495	41	3,495	96.20	0	0
<b>Limited Review:</b>									
Owensboro KY MSA	0	0	31	138	31	138	3.80	0	0

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\* '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 bank's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: KENTUCKY				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2015									
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Opening s	# 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
<b>Full Review:</b>																	
Kentucky Non-MSA	83.66	5	55.56	0.00	20.00	60.00	20.00	0	1	0	0	-1	0	0.00	10.85	59.24	29.91
<b>Limited Review:</b>																	
Owensboro KY MSA	16.34	4	44.44	25.00	0.00	75.00	0.00	0	0	0	0	0	0	5.65	11.04	62.87	20.45

# State of Michigan

## Table 1. Lending Volume

LENDING VOLUME												
Geography: MICHIGAN												
Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015												
Assessment Area (2015):	% 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)	
<b>Full Review:</b>												
Battle Creek MI MSA	3.66	68	5,461	33	3,650	0	0	1	4,100	102	13,211	4.52
<b>Limited Review:</b>												
Ann Arbor MI MSA^	30.68	648	180,598	204	51,662	1	50	1	800	854	233,110	20.59
Grand Rapids-Wyoming MI MSA^^	18.25	368	79,595	137	30,842	0	0	3	17,598	508	128,035	23.71
Jackson MI MSA	5.50	133	12,535	20	2,213	0	0	0		153	14,748	3.86
Kalamazoo-Portage MI MSA	12.79	312	35,275	43	7,931	0	0	1	4,000	356	47,206	14.32
MI Non-MSA	17.96	294	27,355	200	30,316	6	615	0		500	58,286	25.84
Monroe MI MSA^	3.81	59	10,203	45	9,124	1	30	1	1,188	106	20,545	1.84
Niles-Benton Harbor MI MSA	1.98	42	3,379	12	1,562	0	0	1	10,250	55	15,191	4.17
Warren-Troy-Farmington Hills MI MD^	5.39	111	31,167	38	6,870	0	0	1	413	150	38,450	1.15

\* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.  
 \*\* The evaluation period for Community Development Loans is from July 01, 2013 to December 31, 2015.  
 \*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or bank, as appropriate.  
 ^ The evaluation period for the MSA is August 1, 2014 to December 31, 2015  
 ^^ The evaluation period for the MSA is April 1, 2015 to December 31, 2015

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: MICHIGAN					Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Battle Creek MI MSA	9	1.05	4.91	0.00	22.42	22.22	38.92	44.44	33.75	33.33	0.12	0.00	0.00	0.37	0.00	
<b>Limited Review:</b>																
Ann Arbor MI MSA^	331	38.67	3.99	1.21	14.89	5.14	51.87	43.50	29.26	50.15	3.77	2.54	1.19	2.96	6.48	
Grand Rapids-Wyoming MI MSA^^	262	30.61	3.45	4.58	16.74	6.49	45.62	37.02	34.18	51.91	2.54	3.92	1.11	2.19	3.53	
Jackson MI MSA	14	1.64	6.37	0.00	10.04	0.00	54.72	50.00	28.87	50.00	0.53	0.00	0.00	0.47	0.75	
Kalamazoo-Portage MI MSA	42	4.91	3.62	0.00	13.53	11.90	56.20	40.48	26.66	47.62	0.52	0.00	0.69	0.36	0.74	
MI Non-MSA	97	11.33	0.00	0.00	6.36	2.06	56.06	39.18	37.58	58.76	2.89	0.00	2.67	2.28	3.57	
Monroe MI MSA^	33	3.86	0.62	0.00	8.57	3.03	73.90	93.94	16.91	3.03	0.94	0.00	0.00	1.29	0.00	
Niles-Benton Harbor MI MSA	3	0.35	4.11	0.00	11.74	33.33	47.96	0.00	36.19	66.67	0.04	0.00	0.00	0.00	0.10	
Warren-Troy-Farmington Hills MI MD^	65	7.59	0.13	1.54	5.63	1.54	53.35	38.46	40.89	58.46	0.81	0.00	0.50	0.70	0.98	

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

^ The evaluation period for the MSA is August 1, 2014 to December 31, 2015

^^ The evaluation period for the MSA is April 1, 2015 to December 31, 2015

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: MICHIGAN					Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
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	
<b>Full Review:</b>																
Battle Creek MI MSA	16	8.12	4.91	6.25	22.42	37.50	38.92	37.50	33.75	18.75	2.38	20.00	0.00	2.80	2.48	
<b>Limited Review:</b>																
Ann Arbor MI MSA^	21	10.66	3.99	0.00	14.89	9.52	51.87	76.19	29.26	14.29	2.61	0.00	3.85	3.24	1.54	
Grand Rapids-Wyoming MI MSA^^	3	1.52	3.45	0.00	16.74	0.00	45.62	0.00	34.18	100.00	0.42	0.00	0.00	0.00	1.06	
Jackson MI MSA	30	15.23	6.37	13.33	10.04	13.33	54.72	33.33	28.87	40.00	4.29	5.00	10.71	2.67	5.44	
Kalamazoo-Portage MI MSA	63	31.98	3.62	3.17	13.53	7.94	56.20	46.03	26.66	42.86	3.93	9.09	8.06	2.63	4.37	
MI Non-MSA	47	23.86	0.00	0.00	6.36	0.00	56.06	63.83	37.58	36.17	8.65	0.00	0.00	9.27	8.55	
Monroe MI MSA^	3	1.52	0.62	0.00	8.57	0.00	73.90	100.00	16.91	0.00	0.74	0.00	0.00	0.96	0.00	
Niles-Benton Harbor MI MSA	12	6.09	4.11	8.33	11.74	16.67	47.96	25.00	36.19	50.00	1.63	0.00	2.70	0.83	2.47	
Warren-Troy-Farmington Hills MI MD^	2	1.02	0.13	0.00	5.63	0.00	53.35	0.00	40.89	100.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

^ The evaluation period for the MSA is August 1, 2014 to December 31, 2015

^^ The evaluation period for the MSA is April 1, 2015 to December 31, 2015

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MICHIGAN				Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Battle Creek MI MSA	43	4.43	4.91	2.33	22.42	9.30	38.92	37.21	33.75	51.16	0.91	5.56	1.56	0.91	0.54	
<b>Limited Review:</b>																
Ann Arbor MI MSA^	289	29.79	3.99	1.38	14.89	3.11	51.87	53.29	29.26	42.21	3.80	3.26	1.21	3.85	4.49	
Grand Rapids-Wyoming MI MSA^^	100	10.31	3.45	2.00	16.74	3.00	45.62	31.00	34.18	64.00	2.01	1.78	0.63	1.32	3.01	
Jackson MI MSA	89	9.18	6.37	2.25	10.04	4.49	54.72	56.18	28.87	37.08	2.07	2.63	1.09	1.85	2.55	
Kalamazoo-Portage MI MSA	206	21.24	3.62	2.43	13.53	8.25	56.20	54.85	26.66	34.47	1.79	3.70	0.72	1.73	2.08	
MI Non-MSA	150	15.46	0.00	0.00	6.36	2.00	56.06	34.00	37.58	64.00	5.73	0.00	2.27	3.66	8.13	
Monroe MI MSA^	22	2.27	0.62	0.00	8.57	0.00	73.90	90.91	16.91	9.09	0.80	0.00	0.00	0.94	0.54	
Niles-Benton Harbor MI MSA	27	2.78	4.11	0.00	11.74	25.93	47.96	40.74	36.19	33.33	0.40	0.00	0.75	0.23	0.54	
Warren-Troy-Farmington Hills MI MD^	44	4.54	0.13	0.00	5.63	0.00	53.35	40.91	40.89	59.09	0.59	0.00	0.00	0.53	0.68	

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

^ The evaluation period for the MSA is August 1, 2014 to December 31, 2015

^^ The evaluation period for the MSA is April 1, 2015 to December 31, 2015

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: MICHIGAN					Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Battle Creek MI MSA	0	0.00	9.69	0.00	30.47	0.00	42.94	0.00	16.90	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Ann Arbor MI MSA^	7	58.33	20.11	0.00	30.30	28.57	36.45	57.14	13.14	14.29	15.15	0.00	0.00	16.67	14.29	
Grand Rapids-Wyoming MI MSA^^	3	25.00	7.00	0.00	33.46	66.67	47.83	0.00	11.71	33.33	7.14	0.00	7.69	0.00	20.00	
Jackson MI MSA	0	0.00	25.53	0.00	27.06	0.00	37.37	0.00	10.03	0.00	0.00	0.00	0.00	0.00	0.00	
Kalamazoo-Portage MI MSA	1	8.33	8.93	0.00	25.81	0.00	51.98	100.00	13.28	0.00	2.63	0.00	0.00	5.88	0.00	
MI Non-MSA	0	0.00	0.00	0.00	15.90	0.00	66.74	0.00	17.36	0.00	0.00	0.00	0.00	0.00	0.00	
Monroe MI MSA^	1	8.33	0.56	0.00	32.49	0.00	59.42	100.00	7.53	0.00	14.29	0.00	0.00	20.00	0.00	
Niles-Benton Harbor MI MSA	0	0.00	18.72	0.00	22.27	0.00	29.41	0.00	29.60	0.00	0.00	0.00	0.00	0.00	0.00	
Warren-Troy-Farmington Hills MI MD^	0	0.00	10.56	0.00	29.18	0.00	53.24	0.00	7.02	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi-Family Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

^ The evaluation period for the MSA is August 1, 2014 to December 31, 2015

^^ The evaluation period for the MSA is April 1, 2015 to December 31, 2015

Bank ID: Old National Bank

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: MICHIGAN					Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans						
<b>Full Review:</b>																
Battle Creek MI MSA	33	4.51	8.61	9.09	22.83	51.52	38.05	21.21	30.51	18.18	1.19	0.78	1.94	0.66	1.31	
<b>Limited Review:</b>																
Ann Arbor MI MSA^	204	27.87	4.81	1.96	12.50	5.39	49.75	64.71	31.46	27.94	1.95	1.72	1.14	2.43	1.58	
Grand Rapids-Wyoming MI MSA^^	137	18.72	6.28	2.19	18.59	20.44	39.72	34.31	35.41	43.07	1.44	0.54	1.89	1.32	1.55	
Jackson MI MSA	20	2.73	15.31	5.00	14.65	0.00	45.13	65.00	24.73	30.00	0.51	0.32	0.00	0.83	0.47	
Kalamazoo-Portage MI MSA	43	5.87	5.76	6.98	18.00	9.30	53.23	51.16	23.01	32.56	0.52	0.44	0.35	0.53	0.65	
MI Non-MSA	200	27.32	0.00	0.00	7.76	11.00	57.78	47.00	34.46	42.00	5.00	0.00	7.41	4.68	5.27	
Monroe MI MSA^	45	6.15	0.77	0.00	12.00	2.22	71.00	80.00	16.22	17.78	1.99	0.00	0.76	2.22	1.77	
Niles-Benton Harbor MI MSA	12	1.64	9.84	0.00	10.76	16.67	42.32	16.67	37.08	66.67	0.27	0.00	0.54	0.12	0.43	
Warren-Troy-Farmington Hills MI MD^	38	5.19	2.52	2.63	9.74	13.16	51.30	36.84	36.44	47.37	0.67	0.97	1.33	0.53	0.70	

\* Based on 2015 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 (2015).

^ The evaluation period for the MSA is August 1, 2014 to December 31, 2015

^^ The evaluation period for the MSA is April 1, 2015 to December 31, 2015

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: MICHIGAN				Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
Battle Creek MI MSA	0	0.00	1.19	0.00	11.51	0.00	56.35	0.00	30.95	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Ann Arbor MI MSA^	1	12.50	1.24	0.00	5.43	0.00	69.34	100.00	23.98	0.00	1.85	0.00	0.00	2.27	0.00	
Grand Rapids-Wyoming MI MSA^^	0	0.00	1.46	0.00	7.31	0.00	46.85	0.00	44.38	0.00	0.00	0.00	0.00	0.00	0.00	
Jackson MI MSA	0	0.00	1.78	0.00	3.56	0.00	60.99	0.00	33.66	0.00	0.00	0.00	0.00	0.00	0.00	
Kalamazoo-Portage MI MSA	0	0.00	0.87	0.00	17.33	0.00	62.63	0.00	19.17	0.00	0.00	0.00	0.00	0.00	0.00	
MI Non-MSA	6	75.00	0.00	0.00	0.96	0.00	61.87	66.67	37.17	33.33	1.82	0.00	0.00	2.21	1.22	
Monroe MI MSA^	1	12.50	0.00	0.00	2.62	0.00	88.52	100.00	8.85	0.00	0.86	0.00	0.00	0.94	0.00	
Niles-Benton Harbor MI MSA	0	0.00	1.76	0.00	3.68	0.00	63.09	0.00	31.47	0.00	0.00	0.00	0.00	0.00	0.00	
Warren-Troy-Farmington Hills MI MD^	0	0.00	0.69	0.00	3.64	0.00	62.22	0.00	33.45	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2015 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 (2015).

^ The evaluation period for the MSA is August 1, 2014 to December 31, 2015

^^ The evaluation period for the MSA is April 1, 2015 to December 31, 2015

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: MICHIGAN					Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families 21	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Battle Creek MI MSA	9	1.05	20.99	0.00	18.07	33.33	20.52	11.11	40.42	55.56	0.14	0.00	0.29	0.25	0.00	
<b>Limited Review:</b>																
Ann Arbor MI MSA^	331	38.67	21.69	7.23	16.89	11.01	21.43	22.01	39.99	59.75	4.13	2.64	1.73	3.18	6.49	
Grand Rapids-Wyoming MI MSA^^	262	30.61	21.20	3.85	17.60	18.85	21.34	23.08	39.86	54.23	2.99	0.95	1.98	3.04	4.56	
Jackson MI MSA	14	1.64	20.69	0.00	18.28	21.43	21.31	14.29	39.72	64.29	0.63	0.00	0.40	0.38	1.09	
Kalamazoo-Portage MI MSA	42	4.91	22.68	13.16	16.42	10.53	20.50	23.68	40.40	52.63	0.58	1.17	0.21	0.43	0.73	
MI Non-MSA	97	11.33	16.13	6.45	16.75	20.43	22.08	26.88	45.04	46.24	3.21	3.42	2.46	2.52	4.31	
Monroe MI MSA^	33	3.86	18.60	12.12	19.27	33.33	22.93	24.24	39.20	30.30	1.06	1.59	1.43	0.76	0.90	
Niles-Benton Harbor MI MSA	3	0.35	21.66	0.00	18.24	33.33	19.92	33.33	40.18	33.33	0.05	0.00	0.00	0.00	0.10	
Warren-Troy-Farmington Hills MI MD^	65	7.59	14.98	4.62	15.66	9.23	24.12	21.54	45.24	64.62	0.95	0.29	0.64	0.76	1.45	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

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

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

^ The evaluation period for the MSA is August 1, 2014 to December 31, 2015

^^ The evaluation period for the MSA is April 1, 2015 to December 31, 2015

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: MICHIGAN					Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015					Market Share*				
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****	% Families22	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Battle Creek MI MSA	16	8.12	20.99	6.25	18.07	31.25	20.52	18.75	40.42	43.75	2.46	0.00	0.00	2.86	3.65	
<b>Limited Review:</b>																
Ann Arbor MI MSA^	21	10.66	21.69	15.00	16.89	5.00	21.43	25.00	39.99	55.00	2.72	6.82	1.03	1.84	3.33	
Grand Rapids-Wyoming MI MSA^^	3	1.52	21.20	0.00	17.60	0.00	21.34	0.00	39.86	100.00	0.43	0.00	0.00	0.00	0.98	
Jackson MI MSA	30	15.23	20.69	10.00	18.28	16.67	21.31	36.67	39.72	36.67	4.48	3.77	1.61	4.95	5.38	
Kalamazoo-Portage MI MSA	63	31.98	22.68	10.17	16.42	23.73	20.50	15.25	40.40	50.85	3.90	8.70	4.39	2.88	3.33	
MI Non-MSA	47	23.86	16.13	6.38	16.75	14.89	22.08	31.91	45.04	46.81	8.77	7.14	11.29	12.79	6.35	
Monroe MI MSA^	3	1.52	18.60	0.00	19.27	66.67	22.93	0.00	39.20	33.33	0.77	0.00	2.53	0.00	0.90	
Niles-Benton Harbor MI MSA	12	6.09	21.66	18.18	18.24	36.36	19.92	0.00	40.18	45.45	1.27	3.33	1.92	0.00	1.01	
Warren-Troy-Farmington Hills MI MD^	2	1.02	14.98	0.00	15.66	0.00	24.12	100.00	45.24	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.0% of loans originated and purchased by bank.

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

^ The evaluation period for the MSA is August 1, 2014 to December 31, 2015

^^ The evaluation period for the MSA is April 1, 2015 to December 31, 2015

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MICHIGAN					Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families* **	% BANK Loans****	% Families <sup>23</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Battle Creek MI MSA	43	4.43	20.99	11.90	18.07	16.67	20.52	21.43	40.42	50.00	1.11	0.00	1.05	1.10	1.31	
<b>Limited Review:</b>																
Ann Arbor MI MSA^	289	29.79	21.69	5.00	16.89	15.36	21.43	22.86	39.99	56.79	4.39	2.68	3.54	3.76	5.28	
Grand Rapids-Wyoming MI MSA^^	100	10.31	21.20	5.05	17.60	15.15	21.34	13.13	39.86	66.67	2.54	1.17	1.45	1.40	3.98	
Jackson MI MSA	89	9.18	20.69	6.82	18.28	17.05	21.31	15.91	39.72	60.23	2.64	1.20	2.65	1.83	3.22	
Kalamazoo-Portage MI MSA	206	21.24	22.68	9.95	16.42	15.92	20.50	28.86	40.40	45.27	2.13	3.56	1.83	2.31	1.94	
MI Non-MSA	150	15.46	16.13	4.08	16.75	17.69	22.08	32.65	45.04	45.58	6.62	3.45	7.35	7.23	6.43	
Monroe MI MSA^	22	2.27	18.60	0.00	19.27	25.00	22.93	35.00	39.20	40.00	0.86	0.00	0.97	1.06	0.84	
Niles-Benton Harbor MI MSA	27	2.78	21.66	14.81	18.24	22.22	19.92	25.93	40.18	37.04	0.49	1.08	0.46	0.34	0.48	
Warren-Troy-Farmington Hills MI MD^	44	4.54	14.98	2.38	15.66	14.29	24.12	21.43	45.24	61.90	0.65	0.00	0.44	0.59	0.85	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.5% of loans originated and purchased by bank.

<sup>23</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

^ The evaluation period for the MSA is August 1, 2014 to December 31, 2015

^^ The evaluation period for the MSA is April 1, 2015 to December 31, 2015

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: MICHIGAN					Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015				
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
<b>Full Review:</b>									
Battle Creek MI MSA	33	4.51	77.05	54.55	75.76	9.09	15.15	1.19	1.77
<b>Limited Review:</b>									
Ann Arbor MI MSA^	204	27.87	78.05	51.96	38.24	26.96	34.80	1.95	2.00
Grand Rapids-Wyoming MI MSA^^	137	18.72	74.78	43.80	45.26	27.74	27.01	1.44	1.71
Jackson MI MSA	20	2.73	77.48	80.00	55.00	45.00	0.00	0.51	0.85
Kalamazoo-Portage MI MSA	43	5.87	77.51	60.47	62.79	11.63	25.58	0.52	0.64
MI Non-MSA	200	27.32	80.06	62.00	60.00	21.50	18.50	5.00	5.70
Monroe MI MSA^	45	6.15	80.31	62.22	42.22	33.33	24.44	1.99	2.50
Niles-Benton Harbor MI MSA	12	1.64	78.64	83.33	50.00	41.67	8.33	0.27	0.48
Warren-Troy-Farmington Hills MI MD^	38	5.19	83.58	47.37	34.21	47.37	18.42	0.67	0.51

\* Based on 2015 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 - 2015).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.96% of small loans to businesses originated and purchased by the bank.

^ The evaluation period for the MSA is August 1, 2014 to December 31, 2015

^^ The evaluation period for the MSA is April 1, 2015 to December 31, 2015

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MICHIGAN			Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Battle Creek MI MSA	0	0.00	97.42	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
Ann Arbor MI MSA^	1	12.50	96.83	100.00	100.00	0.00	0.00	1.85	4.17
Grand Rapids-Wyoming MI MSA^^	0	0.00	94.98	0.00	0.00	0.00	0.00	0.00	0.00
Jackson MI MSA	0	0.00	99.41	0.00	0.00	0.00	0.00	0.00	0.00
Kalamazoo-Portage MI MSA	0	0.00	94.68	0.00	0.00	0.00	0.00	0.00	0.00
MI Non-MSA	6	75.00	98.83	100.00	50.00	50.00	0.00	1.82	3.51
Monroe MI MSA^	1	12.50	97.21	100.00	100.00	0.00	0.00	0.86	1.23
Niles-Benton Harbor MI MSA	0	0.00	97.06	0.00	0.00	0.00	0.00	0.00	0.00
Warren-Troy-Farmington Hills MI MD^	0	0.00	97.92	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2015 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 - 2015).

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

^ The evaluation period for the MSA is August 1, 2014 to December 31, 2015

^^ The evaluation period for the MSA is April 1, 2015 to December 31, 2015

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: MICHIGAN		Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Battle Creek MI MSA	0	0	4	456	4	456	1.95	0	0
<b>Limited Review:</b>									
Ann Arbor MI MSA^	0	0	32	3,738	32	3,738	11.01	0	0
Grand Rapids-Wyoming MI MSA^^	0	0	45	2,820	45	2,820	12.08	0	0
Jackson MI MSA	0	0	5	716	5	716	3.07	0	0
Kalamazoo-Portage MI MSA	0	0	24	1,865	24	1,865	7.00	0	0
MI Non-MSA	0	0	29	881	29	881	3.77	0	0
Monroe MI MSA^	0	0	4	1,023	4	1,023	4.38	0	0
Niles-Benton Harbor MI MSA	0	0	12	3,394	12	3,394	14.54	0	0
Warren-Troy-Farmington Hills MI MD^	0	0	5	1,024	5	1,024	4.39	0	0
			3	7,430	3	7,430			

\* '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 bank's financial reporting system.

^ The evaluation period for the MSA is August 1, 2014 to December 31, 2015

^^ The evaluation period for the MSA is April 1, 2015 to December 31, 2015

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: MICHIGAN				Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015					
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Opening s	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Battle Creek MI MSA	4.52	2	5.56	50.00	0.00	0.00	50.00	0	1	0	0	0	-1	6.37	25.80	39.54	28.29
<b>Limited Review:</b>																	
Ann Arbor MI MSA <sup>^</sup>	20.59	5	13.89	0.00	0.00	80.00	20.00	0	0	0	0	0	0	8.05	17.84	46.48	24.26
Grand Rapids-Wyoming MI MSA <sup>^^</sup>	23.71	4	11.10	0.00	25.00	0.00	75.00	0	0	0	0	0	0	6.80	20.77	42.13	30.29
Jackson MI MSA	3.86	3	8.33	0.00	33.33	33.33	33.33	0	0	0	0	0	0	9.91	11.04	50.42	24.40
Kalamazoo-Portage MI MSA	14.32	8	22.22	0.00	12.50	0.00	87.50	0	0	0	0	0	0	8.13	16.94	51.82	23.11
MI Non-MSA	25.84	9	25.00	0.00	11.11	66.67	22.22	0	3	0	0	-2	-1	0.00	8.41	56.56	35.03
Monroe MI MSA <sup>^</sup>	1.84	2	5.56	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.96	10.81	72.72	15.51
Niles-Benton Harbor MI MSA	4.17	2	5.56	0.00	0.00	50.00	50.00	0	1	-1	0	0	0	8.58	13.81	45.16	32.45
Warren-Troy-Farmington Hills MI MD <sup>^</sup>	1.15	1	2.78	100.00	0.00	0.00	0.00	0	0	0	0	0	0	0.63	6.35	53.22	39.80

<sup>^</sup> The evaluation period for the MSA is August 1, 2014 to December 31, 2015

<sup>^^</sup> The evaluation period for the MSA is April 1, 2015 to December 31, 2015

# State of Ohio

## Table 1. Lending Volume

LENDING VOLUME												Geography: OHIO		Evaluation Period: JANUARY 1, 2013 TO AUGUST 31, 2015	
Assessment Area (2015):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)				
Full Review:															
Darke County Ohio	100.00	29	1,605	64	3,617	130	15,634	0	0	223	20,856	100.00			

\* Loan Data as of August 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2013 to August 31, 2015.

\*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or bank, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: OHIO				Evaluation Period: JANUARY 1, 2013 TO AUGUST 31, 2015									
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	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Darke County Ohio	5	100.00	0.00	0.00	6.17	20.00	86.21	80.00	7.62	0.00	0.17	0.00	0.00	0.19	0.00

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: OHIO				Evaluation Period: JANUARY 1, 2013 TO AUGUST 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies						
	#	% 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
<b>Full Review:</b>															
Darke County Ohio	13	100.00	0.00	0.00	6.17	0.00	86.21	76.92	7.62	23.08	1.37	0.00	0.00	1.67	0.00

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: OHIO				Evaluation Period: JANUARY 1, 2013 TO AUGUST 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Darke County Ohio	11	100.00	0.00	0.00	6.17	0.00	86.21	90.91	7.62	9.09	0.29	0.00	0.00	0.31	0.00

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY															Geography: OHIO					Evaluation Period: JANUARY 1, 2013 TO AUGUST 31, 2015				
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									
<b>Full Review:</b>																								
Darke County Ohio	0	0.00	0.00	0.00	5.03	0.00	94.97	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00									

\* Based on 2015 Peer Mortgage Data -- US and PR

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi-Family Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: OHIO					Evaluation Period: JANUARY 1, 2013 TO AUGUST 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans						
<b>Full Review:</b>																
Darke County Ohio	64	100.00	0.00	0.00	10.68	1.56	83.51	96.88	5.81	1.56	1.80	0.00	0.00	2.04	1.92	

\* Based on 2015 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 (2015).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: OHIO					Evaluation Period: JANUARY 1, 2013 TO AUGUST 31, 2015								
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
<b>Full Review:</b>															
Darke County Ohio	130	100.00	0.00	0.00	1.03	0.00	76.51	90.00	22.45	10.00	22.50	0.00	0.00	23.95	16.13

\* Based on 2015 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 (2015).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: OHIO					Evaluation Period: JANUARY 1, 2013 TO AUGUST 31, 2015					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families 24	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Darke County Ohio	5	100.00	17.21	20.00	18.80	20.00	24.32	20.00	39.68	40.00	0.20	0.00	0.62	0.00	0.00	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank. 24 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: OHIO				Evaluation Period: JANUARY 1, 2013 TO AUGUST 31, 2015						Market Share*				
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 <sup>25</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Darke County Ohio	13	100.00	17.21	7.69	18.80	53.85	24.32	15.38	39.68	23.08	1.43	0.00	7.14	0.00	0.00	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

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

<sup>25</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: OHIO				Evaluation Period: JANUARY 1, 2013 TO AUGUST 31, 2015					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Families*	% BANK Loans****	% Families <sup>26</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****					
<b>Full Review:</b>															
Darke County Ohio	11	100.00	17.21	10.00	18.80	10.00	24.32	20.00	39.68	60.00	0.34	0.00	0.00	1.30	0.00

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 9.1% of loans originated and purchased by bank.  
<sup>26</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: OHIO					Evaluation Period: JANUARY 1, 2013 TO AUGUST 31, 2015				
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
<b>Full Review:</b>									
Darke County Ohio	64	100.00	80.05	79.69	87.50	9.38	3.13	1.80	3.56

\* Based on 2015 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 - 2015).

\*\*\*\* 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 1.56% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: OHIO			Evaluation Period: JANUARY 1, 2013 TO AUGUST 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Darke County Ohio	130	100.00	97.93	90.00	66.15	18.46	15.38	22.50	28.86

\* Based on 2015 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 - 2015).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 1.54% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
			Geography: OHIO		Evaluation Period: JANUARY 1, 2013 TO AUGUST 31, 2015				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Darke County Ohio	0	0	3	091	3	91	100.00	0	0

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\* '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 bank's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: OHIO				Evaluation Period: JANUARY 1, 2013 TO AUGUST 31, 2015									
MA/Assessment Area:	Deposit s	Branches				Branch Openings/Closings				Population							
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Opening s	# 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
<b>Full Review:</b>																	
Darke County Ohio	100.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0.00	7.37	84.88	7.75