



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

January 2, 2001

### **Community Reinvestment Act Performance Evaluation**

Old National Bank  
Charter Number: 8846

420 Main Street  
Evansville, Indiana 47708-1503

Office of the Comptroller of the Currency

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

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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated  
**"Satisfactory"**

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

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

- Lending Test is weighted more heavily than Investment and Service Tests when arriving at overall rating.

The major factors that support this rating include:

Lending levels are good in the Evansville, Indiana - Henderson, Kentucky MSA, and in the States of Illinois and Kentucky. Lending levels are adequate in the State of Indiana.

The geographic distribution of loans among geographies is good in the States of Indiana and Kentucky. The geographic distribution is adequate in the Evansville, Indiana - Henderson, Kentucky MSA and in the State of Illinois. A substantial majority of ONB's reported loans originated/purchased during the evaluation period were to borrowers located within the Bank's AAs.

The distribution of ONB's loans among borrowers of different income levels is adequate in the Evansville, Indiana - Henderson, Kentucky MSA and in the States of Illinois and Indiana. The distribution is good in the State of Kentucky.

Community Development lending has a positive impact on the Lending Test performance in the Evansville, Indiana - Henderson, Kentucky MSA and in the States of Illinois and Indiana.

Investment activity reflects a good responsiveness to the needs of the Evansville, Indiana - Henderson, Kentucky MSA and an adequate responsiveness to the needs of the States of Illinois, Indiana, and Kentucky.

The accessibility of ONB's delivery systems to the geographies and individuals of different income levels is good in the Evansville, Indiana - Henderson, Kentucky MSA and in the States of Illinois and Indiana. The accessibility of delivery systems was adequate in the State of Kentucky.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation. 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.

**Block Numbering Area (BNA)** - Statistical subdivisions of counties in which census tracts have not been established. The U.S. Census Bureau has established BNAs in conjunction with state agencies.

**Census Tract (CT)** - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per 10 year census and an average population of 4,000.

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

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

**Full-Scope Review** - Performance under the lending, investment and service tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

**Geography** - A census tract or a block numbering area delineated by the U.S. Census Bureau 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 applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

**Home Mortgage Loans** - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

**Limited-Scope 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, branch distribution).

**Low-Income** - Income levels that are less than 50 percent of the median family income.

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

**Metropolitan Statistical Area (MSA)** - Area defined by the director of the U.S. Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

**Middle-Income** - Income levels that are at least 80 percent and less than 120 percent of the MFI.

**Moderate-Income** - Income levels that are at least 50 percent and less than 80 percent of the MFI.

**Small Loans to Businesses** - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

**Small Loans to Farms** - Loans with original amounts of \$500,000 or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

**Tier 1 Capital** - The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income** - Income levels that are 120 percent or more of the MFI.

## Description of Institution

Old National Bank is a mid-size bank headquartered in Evansville, Indiana, and is located in the Evansville, Indiana - Henderson, Kentucky MSA. ONB is a wholly owned subsidiary of Old National Bancorp, also headquartered in Evansville, Indiana, with total assets of approximately \$9 billion. Old National Bancorp is the largest bank holding company headquartered in Indiana. The company provides a comprehensive range of financial services including commercial and retail banking, trust, brokerage, correspondent banking, and insurance. As of December 31, 2000, ONB reported total assets of \$8.6 billion. ONB is an interstate bank with 147 branch offices located in Indiana (98), Illinois (23), Kentucky (20), Tennessee (5), and Ohio (1). The number of branches detailed above does not correspond to the number of branches detailed in Appendix D, because we didn't evaluate the performance of all assessment areas as detailed on page 7.

Significant merger and acquisition activity has occurred since the previous CRA Public Evaluation dated April 14, 1998 when ONB was rated "Satisfactory". Since this date, Old National Bancorp has merged numerous affiliated banks into the lead charter. The lead charter (Peoples National Bank of Lawrenceville) was located in Lawrenceville, Illinois, but moved its headquarters to Evansville, Indiana after its merger with Old National Bank in Evansville. The lead charter also changed its name to Old National Bank on November 5, 1999. A list of the banks that merged into the lead charter in 1999, the counties in which they were located, and the dates of the mergers follows. The counties of Clarke, Dubois, Parke, Vermillion, and Vigo were associated with affiliated banks that merged into ONB in Evansville on September 9, 1999.

BANK NAME	County/State	MERGER DATE
Security Bank & Trust Company	Knox County, IN	10/7/99
ONB Bloomington, N.A.	Monroe County, IN	10/7/99
First State Bank	Muhlenberg, KY	10/7/99
Farmers Bank & Trust Company of Madisonville	Hopkins County, KY	10/7/99
Morganfield National Bank	Union County, KY	10/7/99
The City National Bank of Fulton	Fulton & Hickman Counties, KY	10/7/99
First Citizens Bank & Trust Company	Putnam County, IN	11/4/99
Bank of Western Indiana	Fountain & Warren Counties, IN	11/4/99
United Southwest Bank	Daviess & Martin Counties, IN	11/4/99
Palmer American National Bank of Danville	Vermilion County, IL	11/4/99
First National Bank of Oblong	Crawford County, IL	11/4/99
First National Bank of Harrisburg	Saline County, IL	11/4/99
Old National Bank in	Dubois, Gibson, Parke,	11/5/99

Evansville	Perry, Posey, Spencer, Vanderburgh, Vermillion, Vigo, & Warrick Counties, IN; Henderson County, KY; and Clark, Wabash & White Counties, IL	
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In 1999 and 2000, Old National Bancorp acquired six financial institutions that were subsequently merged into ONB in 2000. A list of the banks that merged into the lead charter in 2000, the counties in which they were located, and the dates of mergers follows.

BANK NAME	COUNTY/STATE	MERGER DATE
Permanent Federal Savings Bank	Gibson, Vanderburgh, & Warrick Counties, IN	7/28/00
Farmers State Bank	Darke County, OH	9/18/00
Peoples Loan & Trust Bank	Randolph & Wayne Counties, IN	9/18/00
American National Bank & Trust Company of Muncie	Boone, Delaware, Grant, Jay, Madison, & Marion Counties, IN	9/18/00
First National Bank & Trust Company	Jackson, Jefferson, Union, & Williamson Counties, IL	10/13/00
Heritage Bank	Montgomery County, TN	10/13/00

ONB is a full service lender offering various loan and deposit products. ONB offers conventional and government guaranteed home mortgage loans, home improvement loans, consumer loans, and a full range of business and agricultural loans. As of December 31, 2000, net loans represented 72 percent of total assets and consisted of commercial and commercial real estate loans (40 percent), residential real estate loans (38 percent), consumer loans (12 percent), agricultural and agricultural real estate loans (5 percent), and other loans (5 percent).

ONB has historically been a commercial, home mortgage, and consumer lender. Agricultural lending is not a primary line of business except in rural areas that ONB serves.

There are no legal, financial, or other factors impeding ONB's ability to help meet the credit needs of the communities it serves. As of December 31, 2000, ONB reported Tier 1 capital of \$605 million.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for the Lending Test is April 1, 1998 through December 31, 2000, with the exception of CD loans. The evaluation period for CD loans, the Investment Test, and the Service Test is April 15, 1998 through January 2, 2001.

We did not consider ONB's performance in the assessment areas (AAs) associated with the merger activity that occurred in year 2000 in the bank's evaluation. This is because at least six months of data was not available to perform a meaningful analysis. The exception is the AAs associated with the Permanent Federal Savings Bank merger. We did evaluate ONB's performance in these AAs because these AAs overlap the AAs of the surviving bank.

We evaluated ONB's origination/purchase of home mortgage loans, small loans to businesses and farms, and CD loans. However, home mortgage loan data was not available for all AAs from April 1, 1998 through December 31, 2000. This is because many of the AAs were associated with affiliated banks that did not have a branch office in a MSA and therefore were not subject to the reporting requirements of the Home Mortgage Disclosure Act until they merged into the lead charter. The following chart depicts, by date, what home mortgage data was available for analysis.

BANK ASSESSMENT AREA	DATES HOME MORTGAGE DATA WAS AVAILABLE
Evansville, IN - Henderson, KY MSA	4/1/98 - 12/31/00
Vermilion County, IL	1/1/00 - 12/31/00
Wabash County, IL	1/1/00 - 12/31/00
Clark County, IL	1/1/00 - 12/31/00
Crawford County, IL	1/1/00 - 12/31/00
Lawrence County, IL	1/1/00 - 12/31/00
Saline County, IL	1/1/00 - 12/31/00
White County, IL	1/1/99 - 12/31/00
Bloomington, IN MSA	4/1/98 - 12/31/00
Daviess, Dubois, Knox, & Martin Counties, IN	1/1/00 - 12/31/00
Terre Haute, IN MSA	4/1/98 - 12/31/00
Fountain & Warren Counties, IN	1/1/00 - 12/31/00
Gibson County, IN	4/1/98 - 12/31/00
Parke County, IN	4/1/98 - 12/31/00
Perry & Spencer Counties, IN	1/1/99 - 12/31/00
Putnam County, IN	1/1/00 - 12/31/00
Hopkins & Muhlenberg Counties, KY	1/1/00 - 12/31/00
Fulton & Hickman Counties KY	1/1/00 - 12/31/00
Owensboro MSA, KY (branch opened 10/99)	10/1/99 - 12/31/00
Union County, KY	1/1/00 - 12/31/00

Additionally, home improvement loan data from April 1, 1998 through December 31, 1999 for the Bloomington MSA and 1999 home mortgage loan data for the Wabash County, Illinois AA was not available for review because the bank did not collect or report this information.



Wabash County, Illinois was one of ONB's AAs as of October 23, 1998. Consequently, 1999 home mortgage data should have been reported.

### **Data Integrity**

We tested ONB's publicly filed information on home mortgage loans and small loans to businesses and farms as part of this CRA evaluation. We tested 1998, 1999, and 2000 loan data. Our review of 1998 and 1999 home mortgage loan data revealed significant errors pertaining to borrower income. Our review of small loans to businesses and farms for 1998 and 1999 revealed significant errors pertaining to improper revenue codes, geo-coding of loans, and reporting of loans that did not meet the definition of small loans to businesses and farms. ONB was able to isolate the sources of the errors and correct the data. ONB's 2000 loan data was substantially accurate. As a result, this evaluation is based on accurate data.

We also reviewed the CD loans, qualified investments, and CD services that were submitted by ONB to verify they met the regulatory definition of CD. A substantial majority of the CD activities submitted by ONB did not meet the definition of CD. We excluded these CD activities from our review.

### **Selection of Areas for Full-Scope Review**

For each state where the bank has an office, we selected a sample of metropolitan and nonmetropolitan AAs within that state for full-scope reviews. Refer to the Scope section under each State Rating for details regarding how we selected the areas. Every multistate metropolitan area in which the bank has branches in more than one state received a full-scope review.

### **Ratings**

The bank's overall rating is a blend of the multistate metropolitan area rating and state ratings. We placed the most weight on the Evansville, Indiana - Henderson, Kentucky MSA ratings and then secondly on the State of Indiana ratings in arriving at the overall bank ratings. This is because these two areas have the largest percentages of ONB's deposits and loans that were originated/purchased during the evaluation period. We placed the least weight on the State of Kentucky ratings because this area has the smallest percentage of ONB's deposits and loans that were originated/purchased during the evaluation period.

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

## **Fair Lending Review**

We performed two comparative file analyses of home improvement loans, in connection with the evaluation of ONB's CRA performance, to determine compliance with anti-discrimination laws. The first comparative file analysis consisted of comparing denied African-American applicants to approved Caucasian applicants. The second comparative file analysis consisted of comparing denied applicants receiving Social Security to approved applicants with earned income. Both comparative file analyses consisted of loan applications processed through the Evansville decision center and covered a time period from October 1, 1998 through July 31, 1999. We evaluated underwriting decisions to determine whether the denied applicants were treated similarly to the approved applicants. No violations of the substantive provisions of the anti-discrimination laws and regulations were identified.

## Multistate Metropolitan Area Rating

CRA Rating for the Evansville, Indiana - Henderson Kentucky MSA<sup>1</sup>:

Satisfactory

The Lending Test is rated: Low

Satisfactory

The Investment Test is rated: High

Satisfactory

The Service Test is rated: High

Satisfactory

The major factors that support this rating include:

Lending levels are good.

The geographic distribution of loans among geographies is adequate.

The distribution of ONB's loans among borrowers of different income levels is adequate. This demonstrates an adequate responsiveness to addressing identified community credit needs.

Community development lending activity and flexible lending practices have a positive impact on Lending Test performance for the Evansville, Indiana - Henderson, Kentucky MSA.

Investment activity reflects a good responsiveness to identified community needs.

The accessibility of ONB's delivery systems to the geographies and individuals of different income levels is good. The bank's performance in providing community development services is good.

### **Description of Institution's Operations in the Evansville, Indiana - Henderson, Kentucky MSA**

Refer to the Market Profile for the Evansville, Indiana - Henderson, Kentucky MSA in Appendix C for detailed demographics and other performance context information.

### **LENDING TEST**

#### **Lending Activity**

Refer to Table 1 in the Multistate Metropolitan Area section of Appendix D for the facts and data used to evaluate the bank's lending activity.

ONB's lending activity is good in the Evansville, Indiana - Henderson, Kentucky MSA.

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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.

In the Evansville, Indiana - Henderson, Kentucky MSA, 60 percent, 37 percent, and 3 percent of the loans originated/purchased were home mortgage loans, small loans to businesses, and small loans to farms, respectively. Among home mortgage loans, 53 percent, 15 percent, and 32 percent were home purchase, home improvement, and home mortgage refinance loans, respectively.

ONB's lending activity is good given its deposit market share, especially considering the large number of lending competitors operating in the area. ONB ranks first in terms of deposits among depository institutions with a 45 percent market share. According to 1999 aggregate HMDA data, ONB is the second largest originator/purchaser of home purchase (15 percent market share), home improvement (25 percent market share), and home mortgage refinance (9 percent market share) loans in the AA. Less than one percentage point separates ONB from the top lender of home mortgage refinance and home improvement loans. Less than four percentage points separate ONB from the top lender of home purchase loans. While ONB's market share percentages for home mortgage loans are lower than its deposit market share, this performance is typical of a larger bank which is one of over 200 reporting mortgage lenders within this AA. Based on 1999 Aggregate CRA data, ONB ranks first among all lenders for small loans to businesses and farms with a 26 percent and 58 percent market share, respectively.

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

The geographic distribution of ONB's home mortgage loans and small loans to businesses is adequate in this AA. The number of farms located in low- and moderate-income geographies in this AA was not significant enough to perform a meaningful analysis. We placed more weight on the distribution of small loans to businesses and then home purchase loans because they represent the largest percentage of loans originated/purchased within the AA.

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

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

#### **Home Purchase Loans**

The geographic distribution of home purchase loans is adequate in this AA. The portion of home purchase loans in low-income geographies equals the portion of owner-occupied housing units that are within those geographies. The bank's market share of loans in low-income geographies is near the bank's overall market share. The portion of home purchase loans in moderate-income geographies is significantly lower than the portion of owner-occupied housing units within those geographies. The bank's market share of loans in moderate-income geographies is lower than the bank's overall market share.

Home Improvement Loans

The geographic distribution of home improvement loans is excellent in this AA. The portion of home improvement loans in low- and moderate-income geographies equals and significantly exceeds, respectively, the portion of owner-occupied housing units that are within those geographies. The bank's market share of loans in low- and moderate-income geographies significantly exceeds and exceeds, respectively, the bank's overall market share.

Home Mortgage Refinance Loans

The geographic distribution of home mortgage refinance loans is poor in this AA. The portion of home mortgage refinance loans in low-income geographies equals the portion of owner-occupied housing units that are within those geographies. The bank's market share of loans in low-income geographies is near the bank's overall market share. The portion of home mortgage refinance loans in moderate-income geographies is significantly lower than the portion of owner-occupied housing units within those geographies. The bank's market share of loans in moderate-income geographies is significantly lower than the bank's overall market share.

***Small Loans to Businesses***

Refer to Table 5 in the Multistate Metropolitan Area 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 businesses.

The geographic distribution of small loans to businesses is adequate in this AA. The portion of small loans to businesses in low-income geographies is significantly lower than the portion of businesses that are within those geographies. The bank's market share of loans in low-income geographies is significantly lower than the bank's overall market share. The portion of small loans to businesses in moderate-income geographies is near the portion of businesses in those geographies. The bank's market share of loans in moderate-income geographies exceeds the bank's overall market share.

***Small Loans to Farms***

Refer to Table 6 in the Multistate Metropolitan Area 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 number of farms located in low- and moderate-income geographies in this AA was not significant enough to perform a meaningful analysis.

***Lending Gap Analysis***

We reviewed summary reports detailing ONB's lending activity over the evaluation period for home mortgage loans and small loans to businesses to identify gaps in the geographic distribution of

loans. We did not identify any unexplained conspicuous gaps in lending.

### ***Inside/Outside Ratio***

A substantial majority (90 percent) of home mortgage loans originated/purchased by ONB during the evaluation period was within the bank's AAs in Illinois, Indiana, and Kentucky. ONB originated/purchased 92 percent, 84 percent, and 92 percent of home purchase, home mortgage refinance, and home improvement loans, respectively, within all of its AAs. The bank originated/purchased 85 percent and 76 percent of small loans to businesses and farms, respectively, within all of the its AAs. All CD loans were originated/purchased within the bank's AAs. We gave positive consideration to this record of lending within the AAs when drawing conclusions relative to the overall geographic distribution of lending by income level of geography.

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

The borrower distribution of ONB's home mortgage loans and small loans to businesses and farms reflects adequate dispersion among borrowers of different income levels in this AA. We placed more weight on the distribution of small loans to businesses and then home purchase loans because they represent the largest percentage of loans originated/purchased within the AA.

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

Refer to Tables 7, 8 and 9 in the Multistate Metropolitan Area section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations/purchases.

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level (12 percent of households) and the barriers that this may have on home ownership.

### **Home Purchase Loans**

ONB has done a good job of addressing the low- and moderate-income borrower credit needs for home purchase loans, an identified credit need. When assessing the bank's performance, we took into consideration the poverty population, as previously discussed. The portion of home purchase loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The bank's market share of loans to low-income borrowers substantially meets its overall market share. The portion of home purchase loans to moderate-income borrowers exceeds the portion of AA families that are moderate-income. The bank's market share of loans to moderate-income borrowers is lower than the bank's overall market share.

### **Home Improvement Loans**

ONB has done an excellent job of addressing the low- and moderate-

income borrower credit needs for home improvement loans, an identified credit need. When assessing the bank's performance, we took into consideration the poverty population, as previously discussed. The portion of home improvement loans to low-income borrowers is lower than the portion of AA families that are low-income. The bank's market share of loans to low-income borrowers exceeds its overall market share. The portion of home improvement loans to moderate-income borrowers significantly exceeds the portion of AA families that are moderate-income. The bank's market share of loans to moderate-income borrowers exceeds the bank's overall market share.

#### Home Mortgage Refinance Loans

The borrower distribution of home mortgage refinance loans is adequate in this AA. When assessing the bank's performance, we took into consideration the poverty population, as previously discussed. The portion of home mortgage refinance loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The bank's market share of loans to low-income borrowers is lower than its overall market share. The portion of home mortgage refinance loans to moderate-income borrowers is lower than the portion of AA families that are moderate-income. The bank's market share of loans to moderate-income borrowers is lower than bank's overall market share.

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

Refer to Table 10 in the Multistate Metropolitan Area 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 businesses.

The borrower distribution of small loans to businesses is adequate in this AA. The portion of ONB's loans extended to businesses with revenues of \$1 million or less is lower than the portion of area businesses that have revenue levels of \$1 million or less. ONB's market share to the \$1 million or less borrowers substantially meets its overall market share to businesses for the AA.

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

Refer to Table 11 in the Multistate Metropolitan Area 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 borrower distribution of small loans to farms is good in this AA. The portion of ONB's loans extended to farms with revenues of \$1 million or less substantially meets the portion of area farms that have revenue levels of \$1 million or less. ONB's market share to the \$1 million or less borrowers substantially meets its overall market share to farms for the AA.

#### **Community Development Lending**

Refer to Table 1 in the Multistate Metropolitan Area section of

Appendix D for the facts and data used to evaluate the bank's level of community development lending.

CD lending has a positive impact on the Lending Test for the Evansville, Indiana - Henderson, Kentucky, MSA. ONB has done a good job of addressing identified needs of affordable housing and social services primarily for low- and moderate-income individuals.

ONB has originated \$9.6 million of CD loans during the evaluation period. Approximately \$7.5 million was used to construct and provide permanent financing for three multifamily housing complexes, with a total of 132-units, designated for low- and moderate-income individuals. The bank loaned approximately \$2 million to CD organizations that provide social services primarily to low- and moderate-income individuals. Fifty-six thousand dollars was used to revitalize and stabilize a low-income census tract. A summary of some of these loans is detailed below.

### **Affordable Housing**

- Two loans totaling \$6.7 million to a limited partnership, and funds from other sources, to construct and provide permanent financing for a 112-unit apartment complex located in Evansville, Indiana.
- Two loans totaling \$725 thousand to a limited partnership, and funds from other sources, to construct and provide permanent financing for a 10-unit housing complex located in Evansville, Indiana.
- One loan for \$83,000 to a limited partnership, and funds from other sources, to construct a 10-unit housing complex located in Evansville, Indiana.

### **Social Services**

- Two loans totaling \$850,000 to finance working capital for a non-profit organization that provides rehabilitation services primarily to low- and moderate-income individuals residing in Evansville, Indiana.
- A loan for \$363,000 to purchase a commercial building by a non-profit organization that provides job training to individuals residing in the Evansville Enterprise Zone. Low- and moderate-income individuals receive assistance with search and placement, resume preparation, and interviewing technique skills.
- Two loans totaling \$330,000 to a non-profit organization that provides various social services primarily to low- and moderate-income elderly individuals residing in Gibson, Perry, Posey, Spencer, Vanderburgh, and Warrick Counties. These counties include an area that is larger than the Evansville, Indiana - Henderson, Kentucky, MSA.
- A loan for \$250,000 to a non-profit organization that provides social services primarily to low- and moderate-income



individuals, who are mentally disabled, residing within the AA.

- A loan for \$80,000 to a non-profit organization that provides free or discounted health care to low- and moderate-income individuals residing within the AA. The organization serves approximately 13,000 clients annually.

### **Product Innovation and Flexibility**

ONB uses proprietary and non-proprietary affordable mortgage programs to meet an identified credit need of affordable housing for low- and moderate-income individuals. The use of flexible mortgage products has a positive impact on the Lending Test for the Evansville, Indiana - Henderson, Kentucky MSA. A summary of these loan programs is detailed below.

- **Open Door Mortgage:** The flexible loan underwriting criteria include 97 percent financing with no requirement for private mortgage insurance, acceptance of grants and gifts for down payments, and reduced closing costs. ONB originated a total of 146 residential mortgage loans (\$7.9 million) during the evaluation period.
- **United States Department of Agricultural (USDA):** The flexible loan underwriting criteria include a long term first mortgage ranging from 20 percent to 40 percent provided by ONB, with the USDA providing a second mortgage with an interest rate ranging from 1 percent to 6 percent. Additional flexible loan underwriting criteria include a reduced down payment. ONB originated a total of 24 residential mortgage loans (\$461,000) during the evaluation period.

## **INVESTMENT TEST**

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

The bank's performance under the Investment Test in the Evansville, Indiana - Henderson, Kentucky MSA is rated "High Satisfactory". Based on the full-scope review, the bank's performance in the above AA is good.

Refer to Table 12 in the Multistate Metropolitan Area section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

ONB's volume of qualified investments and responsiveness to identified credit and non-credit needs is good. In drawing our conclusion relative to this AA, we considered the complexity of the activity, the bank's capacity, the degree of competition, and opportunities available for investment. As described in the Market Profile section for the Evansville, Indiana - Henderson, Kentucky MSA in Appendix C, we determined that a moderate level of investment opportunities exists in the AA and that competition for major investment projects is moderate. ONB made approximately \$6

million of qualified investments during the evaluation period. The vast majority of the qualified investments went to meet a primary need of affordable housing for low- and moderate-income individuals. Refer to the Market Profile in Appendix C. Some of the qualified investments were complex as they involved the use of low-income housing tax credits. See page 20 for a description of the CD services ONB provided relating to the low-income housing tax credits. The bank's qualified investments consisted of low-income housing tax credits (\$1.9 million), a mortgage backed security (\$3.3 million), and donations (\$700,000).

Examples of the qualified investments are detailed below.

### **Low-Income Housing Tax credits**

- ONB acquired 20 percent (\$1 million) of a \$5.1 million low-income housing tax credit. These funds, along with a permanent loan from ONB, a grant from the Federal Home Loan Bank, and other sources, were used to construct a 112-unit apartment complex located in Evansville, Indiana.
- ONB acquired 99 percent (\$396,000) of a \$400 thousand low-income housing tax credit. These funds, along with a permanent loan from ONB, a grant from the Federal Home Loan Bank, and other sources, were used to construct a 10-unit housing complex for the elderly located in Evansville, Indiana.
- ONB acquired 100 percent of a \$546,000 low-income housing tax credit. These funds, along with a permanent loan from ONB, a grant from the Federal Home Loan Bank, and other sources, were used to construct a 10-unit housing complex for the elderly located in Evansville, Indiana.

### **Mortgage Backed Security**

ONB purchased a mortgage-backed security for \$3.3 million with proceeds used to fund the purchase of 72 houses for low- and moderate-income individuals residing in Evansville, Indiana.

### **Donations**

ONB contributed \$700,000 to approximately 40 organizations that have a CD purpose. The donations were made to organizations that provide affordable housing, day care, food donations, health care, job training, and youth recreational activities primarily for low- and moderate-income individuals. ONB also donated money to various United Way chapters. At least 51 percent of the United Way expenditures went to organizations that have a CD purpose.

Investments made by ONB during prior evaluation periods that remain outstanding totaled \$657,000. They consisted of a low-income housing tax credit (\$436,000) used to construct a 22-unit apartment complex in Evansville, Indiana and an investment (\$221,000) in a low-income tax credit fund. The proceeds of the tax credit fund were used to construct (1,046-units) and rehabilitate (239-units) multifamily complexes located in a broader area that includes

Indiana, Illinois, Kentucky, Wisconsin, and Ohio. The investment continues to have a positive impact in the various communities. The investment in the tax credit fund was allocated to the individual AAs based on their pro-rata share of ONB deposits.

## **SERVICE TEST**

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

The bank's performance under the Service Test in the Evansville, Indiana - Henderson, Kentucky MSA is rated "High Satisfactory". Based on the full-scope review, the bank's performance in the above AA is good.

### **Retail Banking Services**

Refer to Table 13 in the Multistate Metropolitan Area section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

ONB's delivery systems are accessible to geographies and individuals of different income levels throughout the AA. Accessibility is good. The distribution of branches in moderate-income geographies exceeds the distribution of the population in those geographies. ONB has no branches in low-income geographies.

Only 2 percent of the AA's population resides in low-income geographies. Branch closures have not adversely affected the accessibility of delivery systems in this AA.

ONB's hours and services offered throughout the Evansville, Indiana - Henderson, Kentucky MSA are good. Office hours and services do not vary in a way that inconveniences its AA, particularly in low- and moderate-income geographies. Banking hours and services are provided Monday through Friday and are supplemented by Saturday hours at 20 of the 24 branch offices. Six of the seven branches located in low- and moderate-income geographies are open on Saturdays. There are no material differences in the level of services offered in branches in low- and moderate-income geographies and those in middle- and upper-income geographies.

ONB offers a Worry Free checking account that has no minimum balance. This allows customers, including those who are low- and moderate-income, to maintain a checking account without paying a monthly service charge. ONB has 244 and 3,544 Worry Free checking accounts maintained by individuals who reside in low- and moderate-income geographies, respectively.

ONB's automatic teller machine (ATM) network offers an alternative delivery system for providing retail banking services to low- and moderate-income individuals and in low- and moderate-income geographies. In the AA, the percentage of ATMs in low-income geographies (2 percent) equals the percentage of the population residing in those geographies (2 percent). The percentage of ATMs in moderate-income geographies (25 percent) exceeds the percentage

of the population residing in those geographies (22 percent).

### **Community Development Services**

ONB's performance in providing CD services in the Evansville, Indiana - Henderson, Kentucky MSA is good given their responsiveness to meeting community needs and the moderate opportunities for CD services in this AA.

ONB's CD services pertain to affordable housing, social services, and credit workshops primarily targeted to low- and moderate-income individuals. Additionally, CD services have assisted in revitalizing and stabilizing low- and moderate-income geographies and providing loans to small businesses that promote economic development by creating permanent jobs primarily for low- and moderate-income individuals. The majority of the above CD services were identified as needs in this AA.

Examples of these and other CD services are detailed below.

### **Affordable Housing**

- **Evansville Coalition for the Homeless:** This organization provides low cost rental housing and transitional housing for low- and moderate-income individuals. An ONB representative assisted the organization in establishing their lease to purchase housing program for their clients.
- **Memorial Pointe Apartments, Phase II:** This is a 10-unit housing complex for low- and moderate-income elderly individuals. An ONB representative assisted Memorial Community Development Corporation, the general partner for this project, apply for and obtain a \$50,000 grant from the Federal Home Loan Bank (FHLB). As part of ONB's participation in the grant, ONB is required to monitor activities of the complex and file status reports regarding the use of grant money.
- **Low-Income Housing Tax Credits:** Representatives of ONB assisted in preparing two Indiana Housing Finance Authority low-income housing tax credit applications. The tax credits were used to partially fund two 10-unit housing complexes for the elderly. Refer to the Investment Test for the Evansville, Indiana - Henderson, Kentucky MSA for further details. ONB's representatives assisted in developing construction cost and cash flow projections, arranging for private and public financing, and assembling the development team consisting of an attorney, accountant, architect, and a general contractor.

### **Financial Planning and Credit Counseling Workshop:**

- **Community Action Program of Evansville (CAPE):** This organization assists low- and moderate-income individuals to save money for educational purposes, to purchase a home, or to start a new business by offering Individual Development Accounts (IDA). CAPE's IDA program allows individuals to receive matching funds from the State of Indiana of three times the amount deposited in

a local financial institution, up to \$900 per year. CAPE also provides home ownership counseling, credit counseling, and small business counseling. ONB Representatives have assisted applicants in completing the application for the IDAs. A total of 102 IDAs were established at ONB during the evaluation period.

- **Consumer Credit Counseling Service:** This organization provides credit counseling, debt management, financial planning, and home ownership training primarily to low- and moderate-income individuals. An ONB representative assists in personnel issues, establishing operating budgets, and preparing a strategic plan.

#### **Loans to Small Businesses and Technical Assistance:**

- **Neighborhood Economic Development Center:** This organization provides loan guarantees, direct loans, and micro loan training programs to individuals who wish to start a business in low- and moderate-income geographies. An ONB representative is a member of the loan committee and reviews business plans of prospective small business owners.
- **Small Business Development Center:** This organization assists in the startup and funding of new small businesses that promote economic development by creating permanent jobs for low- and moderate-income individuals. An ONB representative provides technical expertise relating to developing business plans, obtaining financing, and other related issues.

#### **Revitalizing and Stabilizing Low- and Moderate-Income Areas**

- **Emporia Shopping Center:** This shopping center is located in an Indiana Enterprise Zone located in Evansville, Indiana. The shopping center revitalizes and stabilizes a low-income area by serving and employing low- and moderate-income individuals. The shopping center's main tenant is a non-profit grocery store, which opened for business in January of 2001. The store employs approximately 40 individuals. This is the only grocery store within miles of this neighborhood. ONB Representatives spearheaded the fund raising campaign to overcome a projected \$600,000 shortfall of the estimated \$3.4 million it cost to open the shopping center. ONB activities consisted of establishing a marketing and advertising campaign to raise the needed money.
- **Jacobsville Neighborhood Association:** This neighborhood is located in a distressed low-income geography in Evansville, Indiana. An ONB representative assisted in preparing applications for government grants and developed strategies to revitalize the neighborhood.

#### **Social Services**

- **Children's Learning Center of Posey County:** This non-profit organization provides full day childcare primarily for children of low- and moderate-income working families. An ONB

representative assists in fund raising activities and in developing a strategic plan.

- **Patchwork Central:** This non-profit organization provides childhood development programs, support services, and food for low-income families. An ONB representative assists in fund raising activities and in preparing annual operating budgets.
- **Posey County Rehabilitation Services, Inc.:** This non-profit organization provides social services primarily to disabled low- and moderate-income individuals. Social services include a "work center" that provides employment training. The organization also has a group home that houses eight individuals. An ONB representative assists with fund raising activities.

## State Rating

<b>CRA Rating for Illinois</b>	<b><u>Satisfactory</u></b>
<b>The Lending Test is rated:</b>	<b><u>Low</u></b>
<b><u>Satisfactory</u></b>	
<b>The Investment Test is rated:</b>	<b><u>Low</u></b>
<b><u>Satisfactory</u></b>	
<b>The Service Test is rated:</b>	<b><u>High</u></b>
<b><u>Satisfactory</u></b>	

The major factors that support this rating include:

Lending levels are good.

The geographic distribution of loans among geographies is adequate.

The distribution of ONB's loans among borrowers of different income levels is adequate. This demonstrates an adequate responsiveness to addressing identified community credit needs.

Community development lending has a positive impact on the Lending Test performance for the State of Illinois.

Investment activity reflects an adequate responsiveness to identified community needs.

The accessibility of ONB's delivery systems to the geographies and individuals of different income levels is excellent. The bank's performance in providing community development services is adequate.

### **Description of Institution's Operations in Illinois**

The State of Illinois represents 14 percent (\$691 million) of ONB's total deposits. During the evaluation period, ONB originated/purchased 8 percent, 17 percent, and 34 percent of total home mortgage loans, small loans to businesses, and small loans to farms, respectively, within the State of Illinois. ONB has 15 branch offices and 21 ATMs in Illinois. It has seven AAs and is the 45<sup>th</sup> largest bank in the State of Illinois in relation to deposits. Its AAs are comprised of mostly rural areas. ONB's primary competition includes First Midwest Bank, N.A.; Iroquois Federal Savings and Loan Association; First National Bank of Allendale; and Fifth Third Bank, Indiana.

Refer to the Market Profiles for the State of Illinois in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### **Scope of Evaluation in Illinois**

We selected the AAs of Vermilion County and Wabash County to

receive full-scope reviews. The AA of Vermilion County has the largest percentage (35 percent) of ONB deposits within the State of Illinois. It also has the largest percentage (25 percent) of loans originated/purchased, during the evaluation period, within the State of Illinois. In Wabash County, ONB has the largest deposit market share (40 percent) of any AA within the state.

The remaining AAs of Clark, Crawford, Lawrence, Saline, and White Counties received a limited-scope review. We based the State of Illinois ratings primarily on the results of the full-scope AAs.

We placed more weight on the AA of Vermilion County in arriving at the State of Illinois ratings because this AA had the largest percentage of deposits and loans originated/purchased within the state.

We conducted four community contacts to assist in developing a market profile for the full-scope AAs. We contacted a representative from a housing authority, two economic development agencies, and a small business development center. We determined that opportunities for qualified investments, CD loans, and CD services are somewhat limited. Refer to the Market Profiles for the State of Illinois in Appendix C for detailed information on AA needs.

## **LENDING TEST**

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

The bank's performance under the Lending Test in Illinois is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Vermilion County AA is adequate and in the Wabash County AA is good. We placed more weight on the distribution of loans by income level of the borrower. This is because the Wabash County AA does not have any low- and moderate-income geographies and the Vermilion County AA does not have any low-income geographies.

### **Lending Activity**

Refer to Table 1 in the State of Illinois section of Appendix D for the facts and data used to evaluate the bank's lending activity.

ONB's lending activity in the AAs of Vermilion County and Wabash County is good and adequate, respectively. HMDA market share data for 1999 was not available because ONB was not required to collect this data in these two AAs until year 2000. Refer to the Scope of Evaluation section for further details.

In the Vermilion County AA, 24 percent, 55 percent, and 21 percent of the loans originated/purchased were home mortgage loans, small loans to businesses, and small loans to farms, respectively. In the Wabash County AA, 51percent, 35 percent, and 14 percent of the loans originated/purchased were home mortgage loans, small loans to



businesses, and small loans to farms, respectively.

Among home mortgage loans in the Vermilion County AA, 38 percent, 42 percent, and 20 percent, respectively, were home purchase, home improvement, and home mortgage refinance loans. In the Wabash County AA, 39 percent, 27 percent, and 34 percent, respectively, were home purchase, home improvement, and home mortgage refinance loans.

In the Vermilion County AA, ONB's lending activity is excellent given its deposit market share. ONB ranks first in terms of deposits among depository institutions with a 25 percent market share. According to 1999 aggregate CRA data, ONB is the largest originator/purchaser of small loans to businesses and farms with a 30 percent and 50 percent market share, respectively.

In the Wabash County AA, ONB's lending activity is adequate given its deposit market share. ONB ranks first in terms of deposits among depository institutions with a 40 percent market share. According to 1999 aggregate CRA data, ONB is the third largest originator/purchaser of small loans to businesses with a 18 percent market share. ONB is the second largest originator/purchaser of small loans to farms with a 35 percent market share. While the bank's market share of small loans to businesses and farms is lower than its deposit market share, this performance is adequate. Less than two percentage points separate ONB from the top lender of small loans to businesses and only three loans separate ONB from the top lender of small loans to farms.

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

The geographic distribution of ONB's home mortgage loans and small loans to businesses and farms is adequate in the Vermilion County AA. There are no low-income geographies in this AA. In Vermilion County, we placed more weight on distribution of small loans to businesses because they represent the largest percentage of loans originated/purchased within the AA. As previously mentioned, 1999 HMDA market share data was not available because ONB was not required to collect this data in Vermilion County until year 2000.

There are no low- and moderate-income geographies in the Wabash County AA.

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

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

### **Home Purchase Loans**

The geographic distribution of home purchase loans in the Vermilion County AA is adequate. The portion of home purchase loans in moderate-income geographies is lower than the portion of owner-occupied housing units that are within those geographies. However,

due to low loan volume, the percentage difference is represented by one loan.

#### Home Improvement Loans

The geographic distribution of home improvement loans in the Vermilion County AA is adequate. The portion of home improvement loans in moderate-income geographies is lower than the portion of owner-occupied housing units that are within those geographies. However, due to low loan volume, the percentage difference is represented by two loans.

#### Home Mortgage Refinance Loans

The geographic distribution of home mortgage refinance loans in the Vermilion County AA is adequate. The portion of home mortgage refinance loans in moderate-income geographies is lower than the portion of owner-occupied housing units that are within those geographies. However, due to low loan volume, the percentage difference is represented by less than two loans.

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

Refer to Table 5 in the State of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses in the Vermilion County AA is adequate. The portion of small loans to businesses in moderate-income geographies is lower than the portion of businesses that are within those geographies. However, the bank's market share of loans in moderate-income geographies exceeds the bank's overall market share.

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

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/purchase of small loans to farms.

The geographic distribution of small loans to farms in the Vermilion County AA is adequate. The portion of small loans to farms in moderate-income geographies is significantly lower than the portion of farms that are within those geographies. This level of performance is adequate, as the difference in percentages represents only three loans. The bank's market share of small loans to farms is not meaningful as ONB was the only financial institution to originate/purchase loans (two loans) in moderate-income geographies.

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

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

lending.

### ***Inside/Outside Ratio***

As described under the Evansville, Indiana - Henderson, Kentucky MSA Lending Test, a substantial majority (90 percent) of home mortgage loans ONB originated/purchased during the evaluation period was within the bank's AAs in Illinois, Indiana, and Kentucky. The bank originated/purchased 92 percent, 84 percent, and 92 percent of home purchase, home mortgage refinance, and home improvement loans, respectively, within all of its AAs. ONB originated/purchased 85 percent and 76 percent of small loans to businesses and farms, respectively, within its AAs. All CD loans the bank originated/purchased were within the bank's AAs. We gave this record of lending within the AAs positive consideration when drawing conclusions relative to the overall geographic distribution of lending by income level of geography.

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

The borrower distribution of ONB's home mortgage loans and small loans to businesses and farms reflects adequate and good dispersion among borrowers of different income levels in the AAs of Vermilion County and Wabash County, respectively. As previously mentioned, 1999 HMDA market share data was not available because ONB was not required to collect this data in these two AAs until year 2000. In Vermilion County, we placed more weight on the distribution of small loans to businesses because they represent the largest percentage of loans originated/purchased within the AA. In Wabash County, we placed equal weight on the distribution of small loans to businesses and home mortgage loans because ONB had approximately the same volume of loans originated/purchased within the AA.

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

Refer to Tables 7, 8 and 9 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/purchases.

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership.

### **Home Purchase Loans**

In the Vermilion County AA, ONB has done a good job of addressing the low- and moderate-income borrower credit needs for home purchase loans, an identified credit need. When assessing the bank's performance, we took into consideration the percentage of households (15 percent) that live below the poverty level. The portion of home purchase loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The portion of home purchase loans to moderate-income borrowers significantly exceeds the portion of AA families that are moderate-income.

In the Wabash County AA, the borrower distribution of home purchase loans is good. When assessing the bank's performance, we took into consideration the percentage of households (14 percent) that live below the poverty level. The portion of home purchase loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The portion of home purchase loans to moderate-income borrowers significantly exceeds the portion of AA families that are moderate-income.

#### Home Improvement Loans

In the Vermilion County AA, ONB has done an adequate job of addressing the low- and moderate-income borrower credit needs for home improvement loans, an identified credit need. When assessing the bank's performance, we took into consideration the poverty population, as previously discussed. The portion of home improvement loans to low-income borrowers is significantly lower than the percentage of AA families that are low-income. The portion of home improvement loans to moderate-income borrowers is lower than the portion of AA families that are moderate-income. However, due to low loan volume, the percentage difference is represented by less than three loans.

In the Wabash County AA, the borrower distribution of home improvement loans is adequate. When assessing the bank's performance, we took into consideration the poverty population, as previously discussed. The portion of home improvement loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The portion of home improvement loans to moderate-income borrowers is lower than the percentage of AA families that are moderate-income. However, due to low loan volume, the percentage difference is represented by less than one loan.

#### Home Mortgage Refinance Loans

In the Vermilion County AA, the borrower distribution of home mortgage refinance loans is good. When assessing the bank's performance, we took into consideration the poverty population, as previously discussed. The portion of home mortgage refinance loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The portion of home mortgage refinance loans to moderate-income borrowers significantly exceeds the portion of AA families that are moderate-income.

In the Wabash County AA, the borrower distribution of home mortgage refinance loans is good. When assessing the bank's performance, we took into consideration the poverty population, as previously discussed. The portion of home mortgage refinance loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The portion of home mortgage refinance loans to moderate-income borrowers significantly exceeds the portion of AA families that are moderate-income.

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

Refer to Table 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 origination/purchase of small loans to businesses.

In the Vermilion County AA, the borrower distribution of small loans to businesses is adequate. The portion of ONB's loans extended to businesses with revenues of \$1 million or less is lower than the portion of area businesses that have revenue levels of \$1 million or less. ONB's market share to the \$1 million or less borrowers exceeds its overall market share to businesses for the AA.

In the Wabash County AA, the borrower distribution of small loans to businesses is excellent. The portion of ONB's loans extended to businesses with revenues of \$1 million or less exceeds the portion of area businesses that have revenue levels of \$1 million or less. ONB's market share to the \$1 million or less borrowers exceeds its overall market share to businesses for the AA.

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

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/purchase of small loans to businesses.

In the Vermilion County AA, the borrower distribution of small loans to farms is adequate. The portion of ONB's loans extended to farms with revenues of \$1 million or less is lower than the portion of area farms that have revenue levels of \$1 million or less. ONB's market share to the \$1 million or less borrowers is lower than its overall market share to farms for the AA.

In the Wabash County AA, the borrower distribution of small loans to farms is adequate. The portion of ONB's loans extended to farms with revenues of \$1 million or less is lower than the portion of area farms that have revenue levels of \$1 million or less. ONB's market share to the \$1 million or less borrowers equals its overall market share to farms for the AA.

### **Community Development Lending**

Refer to Table 1 in the State of Illinois section of Appendix D for the facts and data used to evaluate the bank's level of CD lending.

CD lending has a positive impact on the Lending Test for the Vermilion County AA.

ONB did not originate any CD loans in the Wabash County AA.

ONB has done a good job of addressing an identified need of affordable housing for low- and moderate-income individuals. ONB has originated \$1.1 million of CD loans during the evaluation period in the Vermilion County AA. A summary of these loans is detailed below.

One loan for \$700,000 to a limited partnership to restore and remodel two historical buildings into affordable housing. The two

buildings contain 42-units and are located on the Veterans Administration campus in Danville, Illinois. The occupants must be at least 55 years of age and their income can not exceed 60 percent of the median income for Vermilion County. Additional funding for this project came from the Illinois Affordable Housing Trust Fund Program and the selling of low-income housing tax credits and historical tax credits.

One loan for \$350,000 to a non-profit organization that provides temporary housing and counseling for at risk low-income families.

One loan for \$31,000 to a non-profit organization that provides grants to assist low- and moderate-income individuals to rehabilitate their homes and to assist in the purchase of a new home.

### **Product Innovation and Flexibility**

ONB did not present any innovative or flexible loan products for our consideration in the AAs of Vermilion County and Wabash County.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the AAs of Clark County, Lawrence County, Saline County, and White County is not inconsistent with the bank's overall "Low Satisfactory" performance under the Lending Test in Illinois. In the AA of Crawford County, the bank's performance is stronger than the bank's overall performance in the state. Refer to the Tables 1 through 11 in the State of Illinois section of Appendix D for the facts and data that support these conclusions.

The stronger performance in the AA of Crawford County is attributed to an overall stronger performance in the distribution of home mortgage loans and small loans to businesses versus the adequate performance for the State of Illinois. The stronger performance did not raise the level of the bank's overall performance under the Lending Test in the State of Illinois.

### **INVESTMENT TEST**

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

The bank's performance under the Investment Test in Illinois is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the AAs of Vermilion County and Wabash County is adequate.

Refer to Table 12 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's volume of qualified investments and responsiveness to identified credit and non-credit needs is adequate. In drawing our conclusion relative to these AAs, we placed significant weight on the fact that opportunity to make qualified investments other than donations and grants is extremely limited. Refer to the Market Profile section for the State of Illinois in Appendix C. ONB made \$47,000 and \$8,000 of qualified investments in Vermilion County and Wabash County, respectively, during the evaluation period.

### **Vermilion County**

During the evaluation period, ONB donated \$47,000 to 13 organizations that have a CD purpose. The donations were made to an economic development corporation (\$11,000), the United Way (\$26,000), and various other organizations (\$10,000) that primarily serve low- and moderate-income individuals. At least 51 percent of the United Way expenditures went to organizations that have a CD purpose.

### **Wabash County**

During the evaluation period, ONB donated \$8,000 to five organizations that have a CD purpose. Of this amount, 7,500 went to an organization that provides job training to displaced low- and moderate-income workers.

The investment made by ONB during prior evaluation periods that remains outstanding consists of the low-income tax credit fund, as previously discussed. The amount attributed to Vermilion County and Wabash County was \$25,000 and \$9,000, respectively.

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

Based on limited-scope reviews, the bank's performance under the Investment Test in the AAs of Crawford County and White County is not inconsistent with the bank's overall "Low Satisfactory" performance under the Investment Test in Illinois. In the Clark County, Lawrence County, and Saline County AAs the bank's performance is weaker than the bank's overall performance in the state. The weaker performance did not lower the level of the bank's overall performance under the Investment Test in the State of Illinois.

The weaker performance is centered in the lack of qualified investments in these three counties. Refer to Table 12 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 Illinois is rated "High Satisfactory". Based on full-scope reviews, the bank's

performance in the AAs of Vermilion County and Wabash County is good.

### **Retail Banking Services**

Refer to Table 13 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 delivery systems are accessible to geographies and individuals of different income levels throughout the full-scope AAs. Accessibility is excellent in Vermilion County. ONB's distribution of branches throughout moderate-income geographies significantly exceeds the distribution of the population living in moderate-income geographies. There are no low-income geographies in Vermilion County. There were no branch closures in Vermilion County. There are no low- or moderate-income geographies in Wabash County. Branch closures have not adversely affected the accessibility of delivery systems in Wabash County.

ONB's hours and services offered throughout the full-scope AAs are good. Office hours and services do not vary in a way that inconveniences its AAs, particularly in moderate-income geographies. ONB provides banking hours and services Monday through Friday, which are supplemented by Saturday hours at all seven branch offices in Vermilion County. Saturday hours are not available at the branch in Wabash County.

ONB offers a Worry Free checking account that has a no minimum balance. This allows customers, including those who are low- and moderate-income, to maintain a checking account without paying a monthly service charge. ONB has 365 Worry Free checking accounts maintained by individuals who reside in moderate-income geographies in Vermilion County.

ONB's ATM network offers an alternative delivery system for providing retail banking services to low- and moderate-income individuals and in moderate-income geographies. In Vermilion County, the percentage of ATMs in moderate-income geographies (50 percent) exceeds the percentage of the population residing in those geographies (17 percent).

### **Community Development Services**

ONB's performance in providing CD services is good in Wabash County given the responsiveness in addressing community needs and the limited opportunities for CD services. The bank's performance is poor in Vermilion County.

#### **Vermilion County**

ONB has not provided CD services in Vermilion County.

#### **Wabash County**

ONB has met an identified need in Wabash County by providing



technical expertise to an organization that originates loans to small businesses. These loans to small businesses promote economic development by creating permanent jobs, primarily for low- and moderate-income individuals. Other CD services in Wabash County pertain to affordable housing and healthcare services, primarily to low- and moderate-income individuals. Examples of these and other CD services are detailed below.

- **Wabash County Housing Authority:** This organization provides affordable housing for low- and moderate-income individuals. An ONB representative is the Commissioner and Vice Chairman of this organization. As Commissioner, he reviews financial information of each tenant to set the monthly rents for the upcoming year. He also assists in investing idle funds. He identifies what type of housing is needed and assists in developing and approving annual operating budgets. Another ONB representative interviews prospective applicants, performs credit analyses, and provides credit counseling.
- **City of Mount Carmel Revolving Loan Committee:** This organization provides financing to small businesses that promote economic development by creating permanent jobs for low- and moderate-income individuals. An ONB representative sits on a five-person loan committee that reviews loan applications.
- **A Foundation for the Enhancement of Life in Wabash County:** This organization administers health programs primarily for low- and moderate-income individuals. An ONB representative assists in preparing financial statements and grant applications. The ONB representative also advises the board on investment opportunities.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the AAs of Clark and Crawford Counties is not inconsistent with the bank's overall "High Satisfactory" performance under the Service Test in Illinois.

In the AAs of Lawrence and Saline Counties, the bank's performance under the Service Test is stronger than the bank's overall performance in the state. In the AA of White County, the bank's performance is weaker than the bank's overall performance in the state. Refer to Table 13 in the State of Illinois section of Appendix D for the facts and data that support these conclusions.

The stronger performance in Lawrence and Saline Counties is attributed to the bank's distribution of branches in moderate-income geographies exceeding the distribution of the population residing in moderate-income geographies. The weaker performance in White County is attributed to the fact the bank doesn't have any branches in a moderate-income geography.

## State Rating

CRA Rating for Indiana <sup>2</sup> : <u>Satisfactory</u>	
The Lending Test is rated: <u>Satisfactory</u>	<u>High</u>
The Investment Test is rated: <u>Satisfactory</u>	<u>Low</u>
The Service Test is rated: <u>Satisfactory</u>	<u>High</u>

The major factors that support this rating include:

- Lending levels are adequate.
- The geographic distribution of loans among geographies is good.
- The distribution of ONB's loans among borrowers of different income levels is adequate. This demonstrates an adequate responsiveness to addressing identified community credit needs.
- Community development lending has a positive impact on Lending Test performance for the State of Indiana.
- Investment activity reflects an adequate responsiveness to identified community needs.
- The accessibility of ONB's delivery systems to the geographies and individuals of different income levels is good. The bank's performance in providing community development services is adequate.

### Description of Institution's Operations in Indiana

The State of Indiana, excluding the deposits associated with the Evansville, Indiana - Henderson, Kentucky, MSA, represents 33 percent (\$1.6 billion) of ONB's total deposits. During the evaluation period, ONB originated/purchased 44 percent, 34 percent, and 42 percent of total home mortgage loans, small loans to businesses, and small loans to farms, respectively, within the State of Indiana. ONB has 52 branch offices and 74 ATMs in Indiana. It has eight AAs and is the fourth largest bank in the State of Indiana in relation to deposits. Its AAs comprise both rural and small metropolitan areas. The rural AAs consist of Daviess, Dubois, Knox, and Martin Counties; Fountain and Warren

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

Counties; Gibson County; Parke County; Perry and Spencer Counties; and Putnam County. The small metropolitan areas consist of the Bloomington and Terre Haute MSAs. ONB's primary competition includes Fifth Third Bank, Indiana; Bank One, Indiana, N.A.; Terre Haute First National Bank; German American Bank; and Monroe County Bank. The AA of Daviess, Dubois, Knox, and Martin Counties has the largest percentage (37 percent) of ONB's deposits within the State of Indiana. The largest percentages of loans originated/purchased during the evaluation period, within the State of Indiana, were in the Terre Haute (28 percent) MSA and in the AA of Daviess, Dubois, Knox, and Martin Counties (20 percent).

Refer to the Market Profiles for the State of Indiana in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### **Scope of Evaluation in Indiana**

We selected the AAs of the Bloomington MSA, the Terre Haute MSA, and Daviess, Dubois, Knox, and Martin Counties to receive a full-scope review. These AAs were chosen as full-scope reviews since they have the largest percentage of deposits, branches, and loans originated/purchased within the State of Indiana. The remaining AAs of Fountain and Warren Counties, Gibson County, Parke County, Perry and Spencer Counties, and Putnam County received a limited-scope review. We based the State of Indiana ratings primarily on the results of the full-scope AAs. We placed more weight on the full-scope AAs of the Terre Haute MSA and Daviess, Dubois, Knox, and Martin Counties in arriving at the State of Indiana ratings because these two AAs have the largest percentages of the bank's deposits and loans originated/purchased within the state.

We conducted eight community contacts to assist in developing a market profile for the full-scope AAs. We contacted a representative from a housing authority, two non-profit housing organizations, two associations of realtors, one small business development center, and two economic development agencies. We determined that opportunities for qualified investments, CD loans, and CD services do exist within the three AAs. However, they are somewhat limited in the Daviess, Dubois, Knox, and Martin Counties AA. Refer to the Market Profiles for the State of Indiana in Appendix C for detailed information on AA needs.

## **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 Bloomington MSA, the Terre Haute MSA, and the AA of Daviess, Dubois, Knox, and Martin Counties is good.

### **Lending Activity**

Refer to Table 1 in the State of Indiana section of Appendix D for

the facts and data used to evaluate the bank's lending activity.

ONB's lending activity in the Bloomington MSA, the AA of Daviess, Dubois, Knox, and Martin Counties, and in the Terre Haute MSA is adequate.

In the Bloomington MSA, 79 percent and 21 percent of the loans ONB originated/purchased were home mortgage loans and small loans to businesses, respectively. Small loans to farms represented less than 1 percent of total loans in this AA. In the AA of Daviess, Dubois, Knox, and Martin Counties, 27 percent, 44 percent, and 29 percent of the loans originated/purchased were home mortgage loans, small loans to businesses, and small loans to farms, respectively.

In the Terre Haute MSA, 81 percent, 17 percent, and 2 percent of the loans originated/purchased were home mortgage loans, small loans to businesses, and small loans to farms, respectively.

Among home mortgage loans in the Bloomington MSA, 66 percent, 5 percent, and 29 percent, respectively, were home purchase, home improvement, and home mortgage refinance loans. In the Daviess, Dubois, Knox, and Martin Counties AA, 27 percent, 45 percent, and 28 percent, respectively, were home purchase, home improvement, and home mortgage refinance loans. In the Terre Haute MSA, 42 percent, 29 percent, and 29 percent, respectively, were home purchase, home improvement, and home mortgage refinance loans.

In the Bloomington MSA, ONB's lending activity is good given its deposit market share, especially considering the large number of lending competitors operating in the area. ONB ranks third in terms of deposits among depository institutions with a 14 percent market share. According to 1999 aggregate HMDA data, ONB is the largest originator/purchaser of home purchase loans with a 14 percent market share. ONB was the third largest originator/purchaser of home mortgage refinance loans with a 7 percent market share. Less than two percentage points separate ONB from the top lender of home mortgage refinance loans. While ONB's market share of home mortgage refinance loans is lower than its deposit market share, we considered this performance to be adequate given the large number (170) of mortgage lenders within this AA.

Market share data was not available for home improvement loans as ONB failed to collect or report this information in 1998 and 1999.

See Scope of the Evaluation section for further details. Based on 1999 Aggregate CRA data, ONB ranks third and first among all lenders for small loans to businesses and farms with an 8 percent and 36 percent market share, respectively.

In the Daviess, Dubois, Knox, and Martin Counties AA, ONB's lending activity is adequate given its deposit market share. ONB ranks first in terms of deposits among depository institutions with a 31 percent market share. According to 1999 aggregate CRA data, ONB is the largest originator/purchaser of small loans to businesses and farms with a 20 percent and 40 percent market share, respectively. While the bank's market share of small loans to businesses is lower than its deposit market share, this performance is adequate. HMDA market share data for 1999 was not available because ONB was not required to collect this data in this AA until year 2000. Refer to

Scope of the Evaluation section for further details.

In the Terre Haute MSA, ONB's lending activity is adequate given its deposit market share, especially considering the large number of lending competitors operating in the area. ONB ranks second in terms of deposits among depository institutions with a 24 percent market share. According to 1999 aggregate HMDA data, ONB is the third largest originator/purchaser of home purchase loans with a 12 percent market share. ONB was the second largest originator/purchaser of home improvement and home mortgage refinance loans with a 21 percent and 9 percent market share, respectively. While ONB's market share of home purchase and home mortgage refinance loans is significantly lower than its deposit market share, this performance is adequate. Based on 1999 Aggregate CRA data, ONB ranks second and third among all lenders for small loans to businesses and farms with an 11 percent market share for each these types of lending.

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

The geographic distribution of ONB's home mortgage loans and small loans to businesses and farms is good in the Bloomington MSA and in the AA of Daviess, Dubois, Knox, and Martin Counties. The bank's performance in the Terre Haute MSA is adequate.

In the Bloomington MSA and the Terre Haute MSA, we placed more weight on the distribution of home purchase loans because they represent the largest percentage of loans originated/purchased within the AAs. In the AA of Daviess, Dubois, Knox, and Martin Counties, we placed more weight on the performance of small loans to businesses and farms because they represent the largest percentage of loans originated/purchased in the AA. The number of owner-occupied housing units in low-income geographies in the Terre Haute MSA (six) and the Bloomington MSA (six) was not significant enough to perform a meaningful analysis. Additionally, there are no low-income geographies in the AA of Daviess, Dubois, Knox, and Martin Counties. As previously mentioned, 1999 HMDA market share data was not available in the AA of Daviess, Dubois, Knox, and Martin Counties because ONB was not required to collect this data in this AA until year 2000.

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

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

#### Home Purchase Loans

In the Bloomington MSA, the geographic distribution of home purchase loans is good. The portion of home purchase loans in moderate-income geographies exceeds the portion of owner-occupied housing units that are within those geographies. The bank's market share of loans in moderate-income geographies is near the bank's overall market share.

In the AA of Daviess, Dubois, Knox, and Martin Counties, the geographic distribution of home purchase loans is adequate. The portion of home purchase loans in moderate-income geographies is lower than the portion of owner-occupied housing units that are within those geographies. However, due to the low loan volume, the percentage difference is represented by three loans.

In the Terre Haute MSA, the geographic distribution of home purchase loans is adequate. The portion of home purchase loans in moderate-income geographies is lower than the portion of owner-occupied housing units that are within those geographies. The bank's market share of loans in moderate-income geographies is lower than the bank's overall market share.

#### Home Improvement Loans

In the Bloomington MSA, the geographic distribution of home improvement loans is adequate. The portion of home improvement loans in moderate-income geographies is significantly lower than the portion of owner-occupied housing units that are within those geographies. However, due to the low loan volume, the percentage difference is represented by less than five loans. As previously discussed, 1999 market share data was not available for home improvement loans as ONB failed to collect or report this information in 1998 and 1999. See Scope of the Evaluation section for further details.

In the AA of Daviess, Dubois, Knox, and Martin Counties, the geographic distribution of home improvement loans is excellent. The portion of home improvement loans in moderate-income geographies significantly exceeds the portion of owner-occupied housing units that are within those geographies.

In the Terre Haute MSA, the geographic distribution of home improvement loans is good. The portion of home improvement loans in moderate-income geographies is near the portion of owner-occupied housing units that are within those geographies. However, the bank's market share of loans in moderate-income geographies is lower than the bank's overall market share.

#### Home Mortgage Refinance Loans

In the Bloomington MSA, the geographic distribution of home mortgage refinance loans is good. The portion of home mortgage refinance loans in moderate-income geographies is lower than the portion of owner-occupied housing units that are within those geographies. However, the bank's market share of loans in moderate-income geographies significantly exceeds the bank's overall market share.

In the AA of Daviess, Dubois, Knox, and Martin Counties, the geographic distribution of home mortgage refinance loans is adequate. The portion of home mortgage refinance loans in moderate-income geographies is lower than the portion of owner-

occupied housing units that are within those geographies. However, due to the low loan volume, the percentage difference is represented by three loans.

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

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

Refer to Table 5 in the State of Indiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

In the Bloomington MSA, the geographic distribution of small loans to businesses is excellent. The portion of small loans to businesses in moderate-income geographies exceeds the portion of businesses that are within those geographies. The bank's market share of loans in moderate-income geographies significantly exceeds the bank's overall market share. As discussed in the Market Profile (Bloomington MSA) for the State of Indiana in Appendix C, the actual number of businesses located in low-income geographies is minimal. Consequently, we could not perform a meaningful analysis of loans made in low-income geographies.

In the AA of Daviess, Dubois, Knox, and Martin Counties, the geographic distribution of small loans to businesses is good. The portion of small loans to businesses in moderate-income geographies is near the portion of businesses that are within those geographies. The bank's market share of loans in moderate-income geographies significantly exceeds the bank's overall market share.

In the Terre Haute MSA, the geographic distribution of small loans to businesses is adequate. The portion of small loans to businesses in low-income geographies is significantly lower than the portion of businesses that are within those geographies. However, the bank's market share of loans in low-income geographies significantly exceeds the bank's overall market share. The portion of small loans to businesses in moderate-income geographies is near the portion of businesses that are within those geographies. The bank's market share of loans in moderate-income geographies is lower than the bank's overall market share.

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

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/purchase of small loans to farms.

In the Bloomington MSA, the number of farms located in low- and moderate-income geographies was not significant enough to perform a meaningful analysis.

In the AA of Daviess, Dubois, Knox, and Martin Counties, the geographic distribution of small loans to farms is good. The portion of small loans to farms in moderate-income geographies is lower than the portion of farms that are within those geographies.

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

In the Terre Haute MSA, the number of farms located in low- and moderate-income geographies was not significant enough to perform a meaningful analysis.

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

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

### ***Inside/Outside Ratio***

As described under the Evansville, Indiana - Henderson, Kentucky MSA Lending Test, a substantial majority (90 percent) of home mortgage loans originated/purchased by ONB during the evaluation period was within the bank's AAs in Illinois, Indiana, and Kentucky. The originated/purchased 92 percent, 84 percent, and 92 percent of home purchase, home mortgage refinance, and home improvement loans, respectively, within all of its AAs. ONB originated/purchased 85 percent and 76 percent of small loans to businesses and farms, respectively, within all of its AAs. All CD loans originated/purchased were within the bank's AAs. We gave this record of lending within the AAs positive consideration when drawing conclusions relative to the overall geographic distribution of lending by income level of geography.

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

The borrower distribution of ONB's home mortgage loans and small loans to businesses and farms reflects adequate dispersion among borrowers of different income levels in the Bloomington and Terre Haute MSAs. The borrower distribution reflects good dispersion in the Daviess, Dubois, Knox, and Martin Counties AA. As previously mentioned, 1999 HMDA market share data was not available in the AA of Daviess, Dubois, Knox, and Martin Counties because ONB was not required to collect this data in this AA until year 2000. In the Bloomington MSA and the Terre Haute MSA, we placed more weight on the distribution of home purchase loans because they represent the largest percentage of loans originated/purchased within the AAs. In the AA of Daviess, Dubois, Knox, and Martin Counties, we placed more weight on the distribution of small loans to businesses and farms because they represent the largest percentage of loans originated/purchased in the AA.



***Home Mortgage Loans***

Refer to Tables 7, 8 and 9 in the State of Indiana section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership.

Home Purchase Loans

In the Bloomington MSA, ONB has done an adequate job of addressing the low- and moderate-income borrower credit needs for home purchase loans, an identified credit need. When assessing the bank's performance, we took into consideration the percentage of households (19 percent) that live below the poverty level. The portion of home purchase loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The bank's market share of loans to low-income borrowers is lower than its overall market share. The portion of home purchase loans to moderate-income borrowers is lower than the portion of AA families that are moderate-income. The bank's market share of loans to moderate-income borrowers is lower than its overall market share.

In the AA of Daviess, Dubois, Knox, and Martin Counties, ONB has done an adequate job of addressing the low- and moderate-income borrower credit needs for home purchase loans, an identified credit need. When assessing the bank's performance, we took into consideration the percentage of households (14 percent) that live below the poverty level. The portion of home purchase loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The portion of home purchase loans to moderate-income borrowers is higher than the portion of AA families that are moderate-income.

In the Terre Haute MSA, ONB has done an adequate job of addressing the low- and moderate-income borrower credit needs for home purchase loans, an identified credit need. When assessing the bank's performance, we took into consideration the percentage of households (15 percent) that live below the poverty level. The portion of home purchase loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The bank's market share of loans to low-income borrowers is lower than its overall market share. The portion of home purchase loans to moderate-income borrowers is lower than the portion of AA families that are moderate-income. The bank's market share of loans to moderate-income borrowers is lower than its overall market share.

Home Improvement Loans

In the Bloomington MSA, ONB has done an excellent job of addressing

the low- and moderate-income borrower credit needs for home improvement loans, an identified credit need. When assessing the bank's performance, we took into consideration the poverty population, as previously discussed. The portion of home improvement loans to low-income borrowers equals the portion of AA families that are low-income. This performance is excellent. The portion of home improvement loans to moderate-income borrowers significantly exceeds the portion of AA families that are moderate-income. As previously discussed, 1999 market share data was not available for home improvement loans as ONB failed to collect and/or report this information in 1998 and 1999. See Scope of the Evaluation section for further details.

In the AA of Daviess, Dubois, Knox, and Martin Counties, ONB has done a good job of addressing the low- and moderate-income borrower credit needs for home improvement loans, an identified credit need.

When assessing the bank's performance, we took into consideration the poverty population, as previously discussed. The portion of home improvement loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The portion of home improvement loans to moderate-income borrowers is significantly higher than the portion of AA families that are moderate-income.

In the Terre Haute MSA, ONB has done an adequate job of addressing the low- and moderate-income borrower credit needs for home improvement loans, an identified credit need. When assessing the bank's performance, we took into consideration the poverty population, as previously discussed. The portion of home improvement loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The bank's market share of loans to low-income borrowers is significantly lower than its overall market share. The portion of home improvement loans to moderate-income borrowers exceeds the portion of AA families that are moderate-income. The bank's market share of loans to moderate-income borrowers is lower than its overall market share.

#### Home Mortgage Refinance Loans

In the Bloomington MSA, the borrower distribution of home mortgage refinance loans is adequate. When assessing the bank's performance, we took into consideration the poverty population, as previously discussed. The portion of home mortgage refinance loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The bank's market share of loans to low-income borrowers is significantly lower than its overall market share. The portion of home mortgage refinance loans to moderate-income borrowers equals the portion of AA families that are moderate-income. The bank's market share of loans to moderate-income borrowers is significantly lower than its overall market share.

In the AA of Daviess, Dubois, Knox, and Martin Counties, the borrower distribution of home mortgage refinance loans is adequate.

When assessing the bank's performance, we took into consideration the poverty population, as previously discussed. The portion of

home mortgage refinance loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The portion of home mortgage refinance loans to moderate-income borrowers is near the portion of AA families that are moderate-income.

In the Terre Haute MSA, the borrower distribution of home mortgage refinance loans is poor. When assessing the bank's performance, we took into consideration the poverty population, as previously discussed. The portion of home mortgage refinance loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The bank's market share of loans to low-income borrowers is significantly lower than its overall market share. The portion of home mortgage refinance loans to moderate-income borrowers is lower than the portion of AA families that are moderate-income. The bank's market share of loans to moderate-income borrowers is significantly lower than its overall market share.

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

Refer to Table 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 origination and purchase of small loans to businesses.

In the Bloomington MSA, the borrower distribution of small loans to businesses is excellent. The portion of ONB's loans extended to businesses with revenues of \$1 million or less exceeds the portion of area businesses that have revenue levels of \$1 million or less. ONB's market share to the \$1 million or less borrowers exceeds its overall market share to businesses for the AA.

In the Daviess, Dubois, Knox, and Martin Counties AA, the borrower distribution of small loans to businesses is good. The portion of ONB's loans extended to businesses with revenues of \$1 million or less is near the portion of area businesses that have revenue levels of \$1 million or less. ONB's market share to the \$1 million or less borrowers significantly exceeds its overall market share to businesses for the AA.

In the Terre Haute MSA, the borrower distribution of small loans to businesses is excellent. The portion of ONB's loans extended to businesses with revenues of \$1 million or less exceeds the portion of area businesses that have revenue levels of \$1 million or less. ONB's market share to the \$1 million or less borrowers exceeds its overall market share to businesses for the AA.

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

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/purchase of small loans to businesses. In the Bloomington MSA, the total number of small loans to farms was not significant enough to perform a meaningful analysis.

In the Daviess, Dubois, Knox, and Martin Counties AA, the borrower

distribution of small loans to farms is adequate. The portion of ONB's loans extended to farms with revenues of \$1 million or less is lower than the portion of area farms that have revenue levels of \$1 million or less. ONB's market share to the \$1 million or less borrowers is near its overall market share to farms for the AA.

In the Terre Haute MSA, the total number of small loans to farms was not significant enough to perform a meaningful analysis.

### **Community Development Lending**

Refer to Table 1 in the State of Indiana section of Appendix D for the facts and data used to evaluate the bank's level of CD lending.

CD lending has a positive impact on the Lending Test for the Bloomington MSA, the AA of Daviess, Dubois, Knox, and Martin Counties, and the Terre Haute MSA.

#### **Bloomington MSA**

ONB has done a good job of addressing an identified need of affordable housing for low- and moderate-income individuals. ONB has originated three CD loans for \$690,000 during the evaluation period. Loan proceeds were used to provide permanent financing for a total of 32-multifamily rental units for low-and moderate-income individuals.

#### **Daviess, Dubois, Knox, and Martin Counties**

ONB has originated four CD loans for \$1.6 million with proceeds used to provide social services primarily to low- and moderate-income individuals. A summary of these loans is detailed below. This level of CD lending is good.

- A loan for \$1.4 million to an organization that assist individuals in obtaining gainful employment. Individuals receive assistance with resume preparation and interviewing technique skills.
- Two loans totaling \$174,000 to a non-profit organization that provide summer camp activities for mentally and physically handicapped adults.
- A loan for \$50,000 to an organization that provides free health and dental care services to individuals.

#### **Terre Haute MSA**

ONB has originated eight loans for \$21 million with the majority of the proceeds used to revitalize and stabilize low- and moderate-income geographies and promote economic development by financing small businesses. This level of CD lending is excellent. A summary of these loans is detailed below.

- A loan for \$6.2 million with proceeds used to purchase and renovate an abandoned packaging plant located in the city of Terre Haute. This loan promotes economic development by financing a small business that provides permanent jobs to 25 low- and moderate-income individuals.
- Two loans totaling \$3.5 million to a steel fabricating manufacturer located in the city of Terre Haute to purchase and renovate a vacant warehouse. The additional facility promotes economic development by creating permanent jobs for low- and moderate-income individuals. This small business currently employs approximately 200 individuals whose wages range from \$9 to \$17 per hour. Approximately 40 additional employees will be hired.
- A loan for \$2.7 million to provide permanent financing for the acquisition of a depressed shopping center located in the inner city of Terre Haute. This loan revitalized and stabilized a moderate-income geography by employing and serving low- and moderate-income individuals. The shopping center includes a grocery store and a branch of the Terre Haute Housing Authority.
- A loan for \$2.5 million to a non-profit mental health care facility that provide services primarily to low- and moderate-income individuals.
- A loan for \$2.5 million to provide permanent financing for the acquisition, redevelopment, and environmental cleanup of an abandoned wastewater treatment facility located in a moderate-income geography in the city of Terre Haute. This loan revitalized and stabilized a moderate-income geography by cleaning up an abandoned treatment facility and by employing approximately 20 employees with average pay of \$24,000 per year.
- Purchase of a \$1.9 million Terre Haute Redevelopment Revenue bond with proceeds used to construct a multi-purpose building (Center City Project) containing retail shops, office space, and thirty-three apartment units. The city's ownership, construction, and development of this property is part of a master plan to revitalize an Indiana Enterprise Zone located in downtown Terre Haute. Projections indicated the 10 to 12 retail shops would employ 24 low- and moderate-income individuals with an average wage of \$7.00 per hour. Non-rated redevelopment bonds are categorized as loans for regulatory reporting purposes.
- A loan for \$1.5 million to a baked goods manufacturer. Loan proceeds were used to acquire an abandoned manufacturing plant in the city of Seelyville. This loan promotes economic development by financing a small business that created permanent jobs for low- and moderate-income individuals. The manufacturer currently employs approximately 300 individuals, 160 of whom are full time employees. Wages range from \$7 to \$9 per hour.

## **Product Innovation and Flexibility**

ONB uses a proprietary affordable mortgage program to meet an identified credit need of affordable housing for low- and moderate-income individuals residing in the Terre Haute MSA. The use of this flexible mortgage product has a neutral impact on the Lending Test for the Terre Haute MSA due to the low volume of loans originated through this program. The flexible loan underwriting criteria include 100 percent financing with no requirement for private mortgage insurance. ONB originated a total of five of these loans (\$244,000) during the evaluation period.

ONB did not present any innovative or flexible loan products for our consideration for the Bloomington MSA or the AA of Daviess, Dubois, Knox, and Martin Counties.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the AAs of Fountain and Warren Counties, Gibson County, Parke County, and Putnam County is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in Indiana. In the AA of Perry and Spencer Counties, the bank's performance is stronger than the bank's overall performance in the state. Refer to Tables 1 through 11 in the State of Indiana section of Appendix D for the facts and data that support these conclusions.

The stronger performance in the AA of Perry and Spencer Counties is attributed to the large volume of CD lending in this AA.

## **INVESTMENT TEST**

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

The bank's performance under the Investment Test in Indiana is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in Daviess, Dubois, Knox, and Martin Counties is adequate and in the Terre Haute MSA is good. In the Bloomington MSA, the bank's performance is poor.

Refer to Table 12 in the State of Indiana section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

### **Bloomington MSA**

ONB's volume of qualified investments and responsiveness to identified credit and non-credit needs is poor. In drawing our conclusions relative to this AA, we considered the complexity of the activity, the bank's capacity, the degree of competition, and opportunities available for investment. As described in the Market Profile section for the State of Indiana in Appendix C, we determined that a moderate level of investment opportunities exists in the AA and that competition for major investment projects is

moderate. During the evaluation period, ONB only made \$17,000 of qualified investments to 24 organizations that have a CD purpose.

The donations were made to organizations that provide affordable housing, social services for the elderly, and various other CD services primarily to low- and moderate-income individuals. ONB also contributed money to the United Way. At least 51 percent of the United Way expenditures went to organizations that have a CD purpose.

The investment made by ONB during prior evaluation periods that remains outstanding is \$17,000. This investment consisted of the low-income tax credit fund, as previously discussed.

### **Daviess, Dubois, Knox, and Martin Counties**

ONB's volume of qualified investments and responsiveness to identified credit and non-credit needs is adequate. In drawing our conclusion relative to this AA, we placed a significant weight on the fact that opportunity to make qualified investments other than donations and grants is extremely limited. Refer to the Market Profile section for the State of Indiana in Appendix C. During the evaluation period, ONB made \$29,000 of qualified investments to 24 organizations that have a CD purpose. Of this amount, ONB gave 24,000 to United Way chapters. At least 51 percent of the United Way expenditures went to organizations that have a CD purpose.

The investment made by ONB during prior evaluation periods that remains outstanding is \$61,000. This investment consisted of the low-income tax credit fund, as previously discussed.

### **Terre Haute MSA**

ONB's volume of qualified investments and responsiveness to identified credit and non-credit needs is good. In drawing our conclusion relative to this AA, we considered the complexity of the activity, the bank's capacity, the degree of competition, and opportunities available for investment. As described in the Market Profile section for the State of Indiana in Appendix C, we determined that a moderate level of investment opportunities exists in the AA and that competition for major investment projects is moderate. ONB has made \$2.4 million of qualified investments during the evaluation period. The vast majority of the qualified investments were made to meet a primary need of affordable housing for low- and moderate-income individuals. Refer to the Market Profile section in Appendix C. Some of the qualified investments were complex as they involved the use of low-income housing tax credits. The bank's qualified investments consisted of low-income housing tax credits of \$2.3 million and donations of \$44,000.

Examples of the qualified investments are detailed below.

### **Low-Income Housing Tax credits**

- ONB acquired a \$313,000 low-income housing tax credit with proceeds used to construct a 60-unit multifamily apartment complex in Terre Haute, Indiana. Of this amount, ONB funded 45,000 during the evaluation period. The remaining portion was funded during prior evaluation periods.
- ONB acquired a \$2.3 million low-income housing tax credit with proceeds used to construct 35-single family rental houses in Terre Haute, Indiana.

### **Donations**

ONB contributed \$44,000 to the United Way. At least 51 percent of United Way expenditures went to organizations that have a CD purpose.

The investments made by ONB during prior evaluation periods that remain outstanding totaled \$244,000. They consist of a low-income housing tax credit (\$207,000), discussed above, to construct a 60-unit multifamily apartment complex and an investment in the low-income tax credit fund (\$37,000) previously discussed.

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

Based on limited-scope reviews, the bank's performance under the Investment Test in Fountain and Warren Counties, Gibson County, Parke County, Perry and Spencer Counties, and Puntam County is not inconsistent with the bank's overall "Low Satisfactory" performance under the Investment Test in Indiana. Refer to Table 12 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 full-scope reviews, the bank's performance in the Terre Haute MSA and the AA of Daviess, Dubois, Knox, and Martin Counties is good. In the Bloomington MSA, the bank's performance is adequate.

#### **Retail Banking Services**

Refer to Table 13 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.

ONB's delivery systems are readily accessible to geographies and individuals of different income levels throughout the full-scope AAs of the Terre Haute MSA and Daviess, Dubois, Knox, and Martin Counties. ONB's distribution of branches throughout moderate-income geographies in Daviess, Dubois, Knox, and Martin Counties



exceeds the distribution of the population living in moderate-income geographies. There are no low-income geographies in this AA. ONB's distribution of branches throughout low- and moderate-income geographies in the Terre Haute MSA significantly exceeds the distribution of the population living in those geographies. ONB's delivery systems are reasonably accessible to geographies and individuals of different income levels in the Bloomington MSA. ONB's distribution of branches in low-income geographies is significantly lower than the population living in those geographies. However, in moderate-income geographies, ONB's distribution of branches exceeds the distribution of the population living in those geographies.

Branch closures in the Terre Haute MSA and the AA of Daviess, Dubois, Knox, and Martin Counties have not adversely affected the accessibility of delivery systems in these AAs. There weren't any branch closures in the Bloomington MSA; however, there was a branch opening in a moderate-income geography.

ONB's hours and services offered throughout the full-scope AAs are good. Office hours and services do not vary in a way that inconveniences its AAs, particularly in low- and moderate-income geographies. ONB provides banking hours and services Monday through Friday in all three AAs. Saturday hours are available at all 5 branch offices in the Bloomington MSA, at all 10 branch offices in the Terre Haute MSA, and 10 of the 19 branch offices in Daviess, Dubois, Knox, and Martin Counties. In Daviess, Dubois, Knox, and Martin Counties, 2 of the 3 branches located in moderate-income geographies offer Saturday hours. There are no material differences in the services offered at branches in moderate-income geographies versus branches in middle- and upper-income geographies.

ONB offers a Worry Free checking account that has no minimum balance. This allows customers, including those who are low- and moderate-income, to maintain a checking account without paying a monthly service charge. ONB has 792 (low - 15 and moderate - 777) and 1,459 (low - 62 and moderate - 1397) Worry Free checking accounts maintained by individuals who reside in low- and moderate-income geographies in the Bloomington and Terre Haute MSAs, respectively. They also have 1,015 Worry Free checking accounts maintained by individuals who reside in moderate-income geographies in the AA of Daviess, Dubois, Knox, and Martin Counties.

ONB's ATM network offers an alternative delivery system for providing retail banking services to low- and moderate-income individuals and in low- and moderate-income geographies. In Daviess, Dubois, Knox, and Martin Counties, the percentage of ATMs in moderate-income geographies (15 percent) exceeds the percentage of the population residing in moderate-income geographies (14 percent). In the Terre Haute MSA, the percentage of ATMs in low-income geographies (6 percent) and moderate-income geographies (12 percent) exceeds and is lower than the percentage of the population residing in low-income geographies (less than 1 percent) and moderate-income geographies (26 percent), respectively. In the Bloomington MSA, the percentage of ATMs in

low-income geographies (zero percent) and moderate-income geographies (50 percent) is lower than and exceeds the percentage of the population residing in low-income geographies (14 percent) and moderate-income geographies (28 percent), respectively.

### **Community Development Services**

ONB's performance in providing CD services to its full-scope AAs is adequate in the Bloomington MSA, in Daviess, Dubois, Knox, and Martin Counties, and in the Terre Haute MSA.

#### **Bloomington MSA**

ONB has provided an adequate level of CD services in response to community needs, given the moderate opportunities for CD services in this AA.

ONB's CD services have met identified needs of affordable housing and social services primarily for low- and moderate-income individuals. CD services also consisted of credit counseling activities. Examples of these and other CD services are detailed below.

#### **Affordable Housing**

- **Amethyst House:** This organization provides transitional housing and supportive services to low- and moderate-income individuals recovering from alcoholism and drug abuse. The organization serves 15 men and 10 women. An ONB representative assisted the organization in applying for and obtaining a grant from the FHLB. As part of ONB's participation in the grant, ONB is required to file status reports regarding the use of the grant money.
- **Area 10 Agency for Aging:** This organization provides affordable housing for low-income elderly individuals. An ONB representative assisted the organization in applying for and obtaining a grant from the FHLB with proceeds used to assist in the construction of a 48-unit housing complex.
- **Habitat for Humanity:** An ONB representative assisted this organization in applying for and obtaining a grant from the FHLB with proceeds used for down payment assistance on new homes for low- and moderate-income individuals.
- **Monroe County Housing Solutions, Inc.:** This organization strives to ensure the availability of adequate housing for low- and moderate-income individuals by rehabilitating existing housing units and constructing new housing units. An ONB representative assisted the organization in applying for and obtaining a grant from the FHLB with proceeds used for down payment assistance. ONB representatives also provided credit, homebuyer, and home maintenance counseling.
- **Shelter, Inc.:** This organization provides temporary and

transitional housing to low-income individuals. An ONB representative provides expertise regarding the acquisition and maintenance of housing units.

### **Credit Counseling Activities**

- **Consumer Credit Counseling Service of Bloomington:** An ONB representative has provided credit counseling and financial planning seminars primarily to low- and moderate-income individuals.

### **Social Services**

- **Crisis Pregnancy Center - Hannah House:** This organization provides crisis pregnancy counseling primarily for low- and moderate-income individuals. They also provide food, clothing, healthcare, and temporary shelter. The organization serves approximately 1,500 individuals on an annual basis. An ONB representative assisted the organization in obtaining a \$16,000 grant with proceeds used to assist in the construction of a new counseling center.

### **Daviess, Dubois, Knox, and Martin Counties**

ONB has provided an adequate level of CD services in Daviess, Dubois, Knox, and Martin Counties given the limited opportunities for CD services in this AA. ONB's CD services have met an identified need of providing affordable housing primarily to low- and moderate-income individuals. CD services also consisted of providing social services primarily to low- and moderate-income individuals. A description of these CD services is detailed below.

- **Habitat for Humanity of Daviess County:** Two ONB representatives sit on a committee that performs credit analyses of prospective clients.
- **Knox County Association for Retired Citizens:** This organization assists in meeting the needs of physically and mentally handicapped low- and moderate-income individuals. Clients learn daily living skills that allow them to live as independently as possible. An ONB representative assists in preparing budgets and advises on investment opportunities.
- **Tri-Cap Head Start:** This organization provides meals, dental, and healthcare services primarily to low- and moderate-income children. An ONB representative assists in fund raising activities.

### **Terre Haute MSA**

ONB has provided an adequate level of CD services in the Terre Haute MSA given the moderate opportunity for CD services in this AA. ONB's CD services primarily pertain to affordable housing, an identified need in this AA. A description of these CD services is detailed below.

- **Low-Income Housing Tax Credits:** Representatives of ONB assisted in preparing two Indiana Housing Finance Authority low-income housing tax credit applications. The tax credits were used to partially fund a 60-unit multifamily apartment complex and 35-single family rental houses. Refer to the Investment Test for the Terre Haute MSA. ONB's representatives assisted in developing construction cost and cash flow projections, arranging for private and public financing, and assembling the development team consisting of an attorney, accountant, architect, and a general contractor.
- **Habitat for Humanity:** An ONB representative has assisted in fund raising activities, reviewing investment strategies, and establishing annual budgets.
- **21<sup>st</sup> Century Community Learning Center Program:** This organization provides reading enrichment programs in public schools located in high poverty rate areas of the AA. An ONB representative assisted in obtaining a grant from the federal government.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the AAs of Fountain and Warren Counties, Gibson County, Parke County, Perry and Spencer Counties, and Putnam County is not inconsistent with the bank's overall "High Satisfactory" performance under the Service Test in Indiana. Refer to Table 13 in the State of Indiana section of Appendix D for the facts and data that support these conclusions.

## State Rating

<b>CRA Rating for Kentucky<sup>3</sup>: <u>Satisfactory</u></b>	
<b>The Lending Test is rated:</b>	<b><u>High</u></b>
<b><u>Satisfactory</u></b>	
<b>The Investment Test is rated:</b>	<b><u>Low</u></b>
<b><u>Satisfactory</u></b>	
<b>The Service Test is rated:</b>	<b><u>Low</u></b>
<b><u>Satisfactory</u></b>	

The major factors that support this rating:

- Lending levels are excellent.
- The geographic distribution of loans among geographies is good.
- The distribution of ONB's loans among borrowers of different income levels is good. This demonstrates a good responsiveness to addressing identified community credit needs.
- Investment activity reflects an adequate responsiveness to identified community needs.
- The accessibility of ONB's delivery systems to the geographies and individuals of different income levels is adequate. The bank's performance in providing community development services is adequate.

### Description of Institution's Operations in Kentucky

The State of Kentucky, excluding the deposits associated with the Evansville, Indiana - Henderson, Kentucky, MSA, represents 9 percent (\$453 million) of ONB's total deposits. During the evaluation period, ONB originated/purchased 8 percent, 13 percent, and 14 percent of total home mortgage loans, small loans to businesses, and small loans to farms, respectively, within the State of Kentucky. ONB has 15 branch offices and 16 ATMs in Kentucky. It has four AAs and is the 12<sup>th</sup> largest bank in the State of Kentucky in relation to deposits. Its AAs comprise both rural and small metropolitan areas. The rural AAs consist of Hopkins and Muhlenberg Counties; Fulton and Hickman Counties; and Union County.

The small metropolitan area consists of the Owensboro MSA. ONB's primary competition includes Fifth Third Bank, Kentucky, Inc.; Firststar Bank, N.A.; and Owensboro National Bank. The AA of Hopkins and Muhlenberg Counties accounts for 65 percent of ONB's deposits within the State of Kentucky. It also has the largest

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<sup>3</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

percentage (59 percent) of loans originated/purchased, during the evaluation period, within the State of Kentucky.

Refer to the Market Profiles for the State of Kentucky in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### **Scope of Evaluation in Kentucky**

We selected the AA of Hopkins and Muhlenberg Counties to receive a full-scope review. This AA was chosen for a full-scope review because it has the largest percentage of deposits, branches, and loans originated/purchased within the State of Kentucky. The remaining AAs of Fulton and Hickman Counties, the Owensboro MSA, and Union County received a limited-scope review. We placed more weight on the results of the Hopkins and Muhlenberg Counties AA, in arriving at state ratings, since a majority of ONB's deposits and loans originated/purchased within the state were derived from this AA.

We conducted three community contacts to assist in developing a market profile for the Hopkins and Muhlenberg Counties full-scope AA. We contacted a representative from a housing authority, non-profit housing agency, and non-profit organization that provides social services to low- and moderate-income individuals. We determined that opportunities for qualified investments, CD loans, and CD services do exist, but are limited. Refer to the Market Profiles for the State of Kentucky in Appendix C for detailed information on AA needs.

## **LENDING TEST**

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

The bank's performance under the Lending Test in Kentucky is rated "High Satisfactory". Based on the full-scope review, the bank's performance in the Hopkins and Muhlenberg Counties AA is good. We placed more weight on the distribution of loans by income level of the borrower. This is because the Hopkins and Muhlenberg Counties AA does not have any low-income geographies. Additionally, the percentage of owner-occupied housing units and businesses in moderate-income geographies represents a very small portion of the total.

### **Lending Activity**

Refer to Table 1 in the State of Kentucky section of Appendix D for the facts and data used to evaluate the bank's lending activity.

ONB's lending is excellent in the Hopkins and Muhlenberg Counties AA.

In the Hopkins and Muhlenberg Counties AA, 41 percent, 49 percent, and 10 percent of the loans originated/purchased were home mortgage loans, small loans to businesses, and small loans to farms,

respectively. Among home mortgage loans, 43 percent, 40 percent, and 17 percent, respectively, were home purchase, home improvement, and home mortgage refinance loans.

ONB's lending activity is excellent given its deposit market share in the Hopkins and Muhlenberg Counties AA. ONB ranks first in terms of deposits among depository institutions with a 35 percent market share. According to 1999 aggregate CRA data, ONB is the largest originator/purchaser of small loans to businesses and farms with a 45 percent and 70 percent market share, respectively. HMDA market share data for 1999 was not available because ONB was not required to collect this data until year 2000. Refer to the Scope of Evaluation section for further details.

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

The geographic distribution of ONB's home mortgage loans and small loans to businesses is good in the Hopkins and Muhlenberg Counties AA. There are no low-income geographies in this AA. There are only 340 (1 percent) owner-occupied housing units and 41 (2 percent) small businesses located in one moderate-income geography in this AA. The number of farms located in moderate-income geographies was not significant enough to perform a meaningful analysis. As previously mentioned, 1999 HMDA market share data was not available because ONB was not required to collect this data in this AA until year 2000. We placed more weight on the distribution of small loans to businesses because they represent the largest percentage of loans originated/purchased with this AA.

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

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

#### Home Purchase Loans

The geographic distribution of home purchase loans is good in this AA. The portion of home purchase loans in the one moderate-income geography equals the portion of owner-occupied housing units that are within that geography.

#### Home Improvement Loans

The geographic distribution of home improvement loans is excellent in this AA. The portion of home improvement loans in the one moderate-income geography significantly exceeds the portion of owner-occupied housing units that are within that geography.

#### Home Mortgage Refinance Loans

The geographic distribution of home mortgage refinance loans is adequate in this AA. ONB did not originate/purchase any home mortgage refinance loans in the one moderate-income geography. We considered this performance to be adequate because ONB would have matched the portion of owner-occupied housing units in this AA if

they would have originated/purchased one loan. In 1999, there were only two originations/purchases of home mortgage refinance loans in the moderate-income geography from all financial institutions that report home mortgage loans.

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

Refer to Table 5 in the State of Kentucky section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is excellent in this AA. The portion of small loans to businesses in the one moderate-income geography equals the portion of businesses that are within that geography. The bank's market share of loans in the one moderate-income geography exceeds the bank's overall market share.

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

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/purchase of small loans to farms.

The number of farms located in the one moderate-income geography in this AA was not significant enough to perform a meaningful analysis.

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

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

### ***Inside/Outside Ratio***

As described under the Evansville, Indiana - Henderson, Kentucky MSA Lending Test, ONB originated/purchased a substantial majority (90 percent) of home mortgage loans during the evaluation period within the bank's AAs in Illinois, Indiana, and Kentucky. The bank originated/purchased 92 percent, 84 percent, and 92 percent of home purchase, home mortgage refinance, and home improvement loans, respectively, within all of its AAs. It originated/purchased 85 percent and 76 percent of small loans to businesses and farms, respectively, within all of the bank's AAs. All CD loans originated/purchased were within the bank's AAs. We gave positive consideration to this record of lending within the AAs when drawing conclusions relative to the overall geographic distribution of lending by income level of geography.

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

The borrower distribution of ONB's home mortgage loans and small loans to businesses and farms reflects good dispersion among



borrowers of different income levels in the Hopkins and Muhlenberg Counties AA. As previously mentioned, 1999 HMDA market share data was not available because ONB was not required to collect this data in this AA until year 2000. We placed more weight on the distribution of small loans to businesses because they represent the largest percentage of loans originated/purchased within this AA.

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

Refer to Tables 7, 8 and 9 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/purchases.

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level (19 percent of households) and the barriers that this may have on home ownership.

### **Home Purchase Loans**

ONB has done a good job of addressing the low- and moderate-income borrower credit needs for home purchase loans, an identified credit need. When assessing the bank's performance, we took into consideration the poverty population, as previously discussed. The portion of home purchase loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The portion of home purchase loans to moderate-income borrowers equals the portion of AA families that are moderate-income.

### **Home Improvement Loans**

ONB has done a good job of addressing the low- and moderate-income borrower credit needs for home improvement loans, an identified credit need. When assessing the bank's performance, we took into consideration the poverty population, as previously discussed. The portion of home improvement loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The portion of home improvement loans to moderate-income borrowers equals the portion of AA families that are moderate-income.

### **Home Mortgage Refinance Loans**

The borrower distribution of home mortgage refinance loans is adequate in this AA. When assessing the bank's performance, we took into consideration the poverty population, as previously discussed.

The portion of home mortgage refinance loans to low-income borrowers is significantly lower than the portion of AA families that are low-income. The portion of home mortgage refinance loans to moderate-income borrowers is lower than the percentage of AA families that are moderate-income.

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

Refer to Table 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 origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is excellent in this AA. The portion of ONB's loans extended to businesses with revenues of \$1 million or less exceeds the portion of area businesses that have revenue levels of \$1 million or less. ONB's market share to the \$1 million or less borrowers exceeds its overall market share to businesses for the AA.

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

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/purchase of small loans to farms.

The borrower distribution of small loans to farms is good in this AA. The portion of ONB's loans extended to farms with revenues of \$1 million or less substantially meets the portion of area farms that have revenue levels of \$1 million or less. ONB's market share to the \$1 million or less borrowers equals its overall market share to farms for the AA.

### **Community Development Lending**

Refer to Table 1 in the State of Kentucky section of Appendix D for the facts and data used to evaluate the bank's level of CD lending.

ONB did not originate any CD loans in the AA of Hopkins and Muhlenberg Counties.

### **Product Innovation and Flexibility**

ONB did not present any innovative or flexible loan products for our consideration in the AA of Hopkins and Muhlenberg Counties.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the AAs of Fulton and Hickman Counties and Union County is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in Kentucky. In the Owensboro MSA, the bank's performance is weaker than the bank's overall performance in the state. Refer to the Tables 1 through 11 in the State of Kentucky section of Appendix D for the facts and data that support these conclusions.

The weaker performance in the Owensboro MSA is attributed to the overall weaker performance in the geographic distribution and borrower distribution of loans in this AA versus the good performance for the State of Kentucky. The weaker performance did not lower the level of the bank's overall performance under the Lending Test in the State of Kentucky.

## **INVESTMENT TEST**

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

The bank's performance under the Investment Test in Kentucky is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Hopkins and Muhlenberg Counties AA is adequate.

Refer to Table 12 in the State of Kentucky section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

ONB's volume of qualified investments and responsiveness to identified credit and non-credit needs is adequate. In drawing our conclusion relative to this AA, we placed significant weight on the fact that opportunity to make qualified investments other than donations and grants is extremely limited. Refer to the Market Profile section for the State of Kentucky in Appendix C. ONB made \$51,000 of qualified investments during the evaluation period.

The qualified investments consisted of donations to 21 organizations that have a CD purpose. ONB made donations to affordable housing organizations, the Salvation Army, the United Way, and to various other organizations that primarily serve low- and moderate-income individuals. At least 51 percent of the United Way expenditures went to organizations that have a CD purpose.

The investment made by ONB during prior evaluation periods that remains outstanding is \$30,000. This investment consisted of the low-income tax credit fund previously discussed.

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

Based on limited-scope reviews, the bank's performance under the Investment Test in Union County and Fulton and Hickman Counties is not inconsistent with the bank's overall "Low Satisfactory" performance under the Investment Test in Kentucky. In the Owensboro MSA the bank's performance is weaker than the bank's overall performance in the state. The weaker performance did not lower the level of the bank's overall performance under the Investment Test in the State of Kentucky.

The weaker performance in the Owensboro MSA is centered in the lack of qualified investments in this MSA. Refer to Table 12 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 "Low Satisfactory". Based on the full-scope review, the bank's performance in Hopkins and Muhlenberg Counties is adequate.

### **Retail Banking Services**

Refer to Table 13 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 delivery systems are reasonably accessible to geographies and individuals of different income levels throughout Hopkins and Muhlenberg Counties. There are no low-income geographies. ONB does not have any branches in moderate-income geographies. However, there is only one moderate-income geography that represents one percent of the total population of this AA. Branch closures have not adversely affected the accessibility of delivery systems in this AA.

ONB's hours and services offered throughout Hopkins and Muhlenberg Counties are good. Office hours and services do not vary in a way that inconveniences its AA, particularly in low- and moderate-income geographies. ONB provides banking hours and services Monday through Friday. Saturday banking hours are available at three of the four branch offices located in Hopkins County. Saturday banking hours are not available in Muhlenberg County.

ONB offers a Worry Free checking account that has no minimum balance. This allows customers, including those who are low- and moderate-income, to maintain a checking account without paying a monthly service charge. ONB has 46 Worry Free checking accounts maintained by individuals who reside in moderate-income geographies.

ONB's ATM network offers an alternative delivery system for delivering retail banking services to low- and moderate-income individuals. ONB does not have any ATMs in moderate-income geographies. However, as previously mentioned, only 1 percent of the total population resides in the one moderate-income geography.

### **Community Development Services**

ONB's performance in providing CD services in Hopkins and Muhlenberg Counties is adequate given the somewhat limited opportunities for CD services in this AA. ONB's CD services mainly consisted of providing credit counseling, homebuyer, and financial planning seminars for various non-profit organizations that primarily serve low- and moderate-income individuals. These organizations include Central City Public Housing, Family Resource Center, Habitat for Humanity, Housing Authority of Hopkins County, and Madisonville Housing Authority.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the AAs of Fulton and Hickman Counties, and Union County is not inconsistent with the bank's overall "Low Satisfactory" performance under the Service Test in Kentucky. In the Owensboro MSA, the bank's performance is weaker than the overall performance in the state. Refer to Table 13 in the State of Kentucky section of Appendix D for the facts and data that support these conclusions.

The weaker performance in the Owensboro MSA is centered in a lack of branches in low- or moderate-income geographies. The weaker performance did not lower the level of the bank's overall performance under the Service Test in the State of Kentucky.

## 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): 4/1/98 to 12/31/00 Investment and Service Test and CD Loans : 4/15/98 to 1/2/01	
<b>Financial Institution</b>		<b>Products Reviewed</b>
Old National Bank Evansville, Indiana		Home mortgage loans, small loans to businesses and farms, and CD loans.
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	NA	NA
<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 - Henderson, KY MSA # 2440 State of Illinois Vermilion County Wabash County Clark County Crawford County Lawrence County Saline County White County State of Indiana Bloomington MSA # 1020 Daviss, Dubois, Knox, & Martin Counties Terre Haute MSA # 8320 Fountain & Warren Counties Gibson County Parke County Perry & Spencer Counties Putnam County State of Kentucky Hopkins & Muhlenberg Counties Fulton & Hickman Counties Owensboro MSA # 5990	Full-Scope  Full-Scope Full-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope  Full-Scope Full-Scope  Full-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope  Full-Scope  Limited-Scope Limited-Scope Limited-Scope	

Union County		
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**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	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Evansville, IN - Henderson, KY MSA	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Illinois	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Indiana	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Kentucky	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

(\*) The Lending Test is weighted more heavily than the Investment and Service Test in the overall rating.



**Appendix C: Market Profiles for Full-Scope Areas**

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**Market Profiles for Areas Receiving Full-Scope Reviews**

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## Multi-state Metropolitan Area

### (Evansville, Indiana - Henderson, Kentucky MSA)

Demographic Information for Full-Scope Area: Evansville, Indiana - Henderson, Kentucky MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	81	5%	29%	43%	22%	1%
Population by Geography	278,990	2%	22%	46%	30%	0%
Owner-Occupied Housing by Geography	74,911	1%	19%	47%	33%	0%
Businesses by Geography	9,991	2%	22%	51%	25%	0%
Farms by Geography	922	1%	4%	62%	33%	0%
Family Distribution by Income Level	77,234	19%	18%	24%	39%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	29,074	3%	34%	46%	17%	0%
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$33,523 = \$49,700 = 12.4%	Median Housing Value Unemployment Rate (October 2000)				= \$54,279 = 2.5%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

ONB's AA consists of the entire Evansville, Indiana - Henderson, Kentucky MSA. ONB has 24 branch offices and 50 ATMs located in the MSA. The ATMs are located at 21 of the 24 branch offices and at 29 off premise sites. As of June 30, 2000, 44 percent of ONB's deposits were derived from this MSA. Over the evaluation period, 40 percent of home mortgage loans, 36 percent of small loans to businesses, and 10 percent of small loans to farms were derived from this AA.

ONB's deposits in the Evansville, Indiana - Henderson, Kentucky MSA total approximately \$2.2 billion. Based on FDIC deposit market share data as of June 30, 2000, this equates to a 45 percent deposit market share that ranks ONB as the largest deposit taking institution in the MSA.

The Evansville, Indiana - Henderson, Kentucky MSA is located in southwestern Indiana and northwestern Kentucky. Stability, diversity, and vitality best describe the business climate of the MSA. The local economy is well respected for manufacturing, warehousing and distribution, retailing, and health services. The Evansville area has one of the highest percentages of skilled and semiskilled production workers relative to the total workforce, as compared to surrounding states. Non-agricultural wage and salaried employment has risen moderately from 133,350 in 1991 to 152,367 in 1999, an increase of 14 percent.

The unemployment rate for the MSA was 2.5 percent, as compared to 3.9 percent and 2.1 percent for the State of Kentucky and State of Indiana, respectively. Major employers include Bristol Myers Squibb, Evansville-Vanderburgh School Corporation, Whirlpool Corporation, ALCOA Warrick Operations, Deaconess Hospital, and St. Mary's Medical Center. All six employ more than 2,000 individuals.

In the Evansville, Indiana - Henderson, Kentucky MSA, approximately 12 percent of households are below the poverty level. It is especially difficult for this segment of the population to afford and maintain a home.

Housing in the Evansville, Indiana - Henderson, Kentucky MSA is affordable. Based on current interest rates, the updated HUD median family income of \$49,700, and traditional lending terms, an individual who earns 50 percent or more (i.e. moderate-income and above) of the median family income would be able to afford to purchase a \$70,000 home within the MSA. In 2000, the average sales price of a home was \$108,136. A total of 1,178 (34 percent) of the 3,437 homes that sold in 2000 were for \$70,000 or less.

In 1999, the National Low Income Housing Coalition (NLIHC) estimates that 43 percent of renters paid more than 30 percent of their income for housing costs, as compared to 40 percent and 41 percent respectively, for the states of Indiana and Kentucky. An individual would either need to earn 183 percent of the federal minimum wage (based on a 40-hour workweek) or work a 73-hour workweek to afford the fair market rent of \$489.

Included in this AA is an Indiana designated Enterprise Zone located in Evansville, Indiana. When the Enterprise Zone was established in 1983, the unemployment rate within the Zone was at 16 percent, 50 percent of the Zone's residents lived below the poverty level, and less than half of all homes within the Zone were owner occupied. Since that time, over 9,000 new jobs were created and over \$385 million in new capital investment was made. The poverty rate in the Zone has dropped by a third and the joblessness has been cut in half. This improvement is a result of the numerous tax benefits and incentives, and loan and grant programs offered to new and existing businesses through the Evansville Urban Enterprise Association. Additionally, many programs exist to assist residents in obtaining healthcare and childcare, temporary shelter, financing for a new home, job training, and family counseling services.

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

- Affordable housing (i.e. single family rental, multifamily rental, home ownership, and rehabilitation) for low- and moderate-income individuals. Public and rental assisted housing and down payment assistance were also identified as needs.
- Small business working capital loans to existing and start up businesses in amounts of \$25,000 and less. Technical assistance

to new and existing businesses was also identified as a need.

- Social services to low- and moderate-income families including child care services, counseling and job training, credit and home ownership counseling, food donation, health care services, mental illness and substance abuse services, and public transportation.

We determined these community needs by contacting representatives from local housing and community service agencies, a non-profit organization that is the governing body for the Evansville Enterprise Zone, and small business development organizations. We also reviewed the Department of Housing and Urban Development (HUD) Consolidated Strategies and Plans for the cities of Evansville, Indiana and Henderson, Kentucky. HUD Consolidated Strategies and Plans are comprehensive planning documents that identify community needs.

We determined that the opportunity to make CD loans and qualified investments, and to provide CD services within this AA is moderate. These opportunities include low-income housing tax credits, community development corporations, non-profit housing organizations, credit counseling agencies, small business development centers, affordable housing mortgage bonds, and non-profit organizations that provide social services to low- and moderate-income individuals. Overall, opportunities for partnerships are moderate. Competition for CD loans, qualified investments, and CD services is moderate and consists primarily of two other financial institutions that have the second and third largest deposit market share within the MSA.

**State of Illinois Full-Scope Area  
(Vermilion County, Illinois)**

Demographic Information for Full-Scope Area: Vermilion County, Illinois						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	25	NA	20%	56%	24%	0%
Population by Geography	88,257	NA	17%	64%	19%	0%
Owner-Occupied Housing by Geography	24,269	NA	14%	66%	20%	0%
Businesses by Geography	2,765	NA	29%	57%	14%	0%
Farms by Geography	609	NA	3%	85%	12%	0%
Family Distribution by Income Level	24,259	20%	18%	21%	41%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	9,288	NA	24%	68%	8%	0%
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$29,693 = \$43,600 = 14.6%	Median Housing Value Unemployment Rate (October 2000)			= \$39,418 = 5.7%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

ONB's AA consists of Vermilion County. ONB has seven branch offices and six ATMs located in the AA. The ATMs are located at three of the seven branch offices and at three off premise sites. As of June 30, 2000, 5 percent of ONB's deposits were derived from this AA. Over the evaluation period, 2 percent of home mortgage loans, 6 percent of small loans to businesses, and 6 percent of small loans to farms were derived from this AA.

ONB's deposits in the AA total approximately \$244 million. Based on FDIC deposit market share data as of June 30, 2000, this equates to a 25 percent deposit market share that ranks ONB as the largest deposit taking institution in the AA.

This AA is located in east central Illinois on the Illinois and Indiana state line. The local economy is relatively good. Several large companies have either started operations or have expanded their operations creating a significant number of reasonable paying jobs. In year 2000, Quaker Oats and The Sygma Network expanded their operations creating an additional 100 and 120 jobs, respectively. Ubid.com and Fiberteq started operations in year 2000 that created 120 and 60 jobs, respectively. Most new jobs pay in the range of \$11 to \$16 per hour. The major industries consist of manufacturing, service, and agriculture. The major employers are Vermilion County Schools, Provena United Samaritans' Medical Center, Veterans Affairs Medical Center, McLane Midwest Company, Inc., and NACCO Materials Handling Group, Inc. The

unemployment rate of 5.7 percent is higher than the State of Illinois' rate of 3.6 percent. Non-agricultural wage and salaried employment has remained fairly steady from 36,661 in 1991 to 36,398 in 1999, a decrease of 1 percent.

In Vermilion County, approximately 15 percent of households are below the poverty level. It is especially difficult for this segment of the population to afford and maintain a home.

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

The city of Danville has experienced good growth in residential housing. The city and non-profit organizations have been instrumental in rehabilitating existing residential real estate in the inner city. In 1999, the NLIHC estimated that 44 percent of renters paid more than 30 percent of their income for housing costs, which equals the percentage for the State of Illinois. An individual would either need to earn 154 percent of the federal minimum wage (based on a 40-hour workweek) or work a 62-hour workweek to afford the fair market rent of approximately \$412.

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

- Affordable housing (i.e. single family rental, multifamily rental, home ownership, and rehabilitation) for low- and moderate-income individuals. Public and rental assisted housing and down payment assistance were also identified as needs.
- Small business loans for prospective new businesses. Technical assistance to new and existing businesses was also identified as a need.

We determined these community needs by contacting representatives from an economic development corporation and a small business development center.

We determined that the opportunity to make CD loans and qualified investments, and to provide CD services within this AA is limited.

These opportunities include affordable mortgage housing bonds offered through the State of Illinois, a non-profit housing organization, a small business development center, and numerous non-profit organizations that provide social services to low- and moderate-income individuals. Our research revealed that the opportunity to make qualified investments other than donations and grants is extremely limited. Opportunities for partnerships are also limited.

**State of Illinois Full-Scope Area  
(Wabash County, Illinois)**

Demographic Information for Full-Scope Area: Wabash County, Illinois						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	4	NA	NA	75%	25%	0%
Population by Geography	13,111	NA	NA	76%	24%	0%
Owner-Occupied Housing by Geography	3,814	NA	NA	76%	24%	0%
Businesses by Geography	546	NA	NA	74%	26%	0%
Farms by Geography	82	NA	NA	29%	71%	0%
Family Distribution by Income Level	3,608	20%	15%	23%	42%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	1,262	NA	NA	84%	16%	0%
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$29,693 = \$43,600 = 13.8%	Median Housing Value Unemployment Rate (October 2000)				= \$42,765 = 7.1%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

ONB's AA consists of Wabash County. ONB has one branch office and three ATMs located in the AA. The ATMs are located at the branch and at two off premise sites. As of June 30, 2000, 2 percent of ONB's deposits were derived from this AA. Over the evaluation period, 1 percent of home mortgage loans, 1 percent of small loans to businesses, and 2 percent of small loans to farms were derived from this AA.

ONB's deposits in the AA total approximately \$92 million. Based on FDIC deposit market share data as of June 30, 2000, this equates to a 40 percent deposit market share that ranks ONB as the largest deposit taking institution in the AA.

This AA is located in southeastern Illinois on the Illinois and Indiana state line. The local economy is stable. Manufacturing is the main industry. Snap on Tools is the major employer with approximately 500 employees. Oil, gas, coal and related businesses continue to be a significant source of employment. Agriculture continues to be a major employer with numerous family owned farms. In 1998, a major manufacturing firm (Cypress Amex) ceased operations due to labor disputes. However, Wabash County was not significantly impacted because a majority of its employees lived outside the county. The unemployment rate for the AA is high at 7.1 percent, compared to 3.6 percent for the State of Illinois. Non-agricultural wage and salaried employment has declined 13.5 percent from 5,097 in 1991 to 4,407 in 1999.

In Wabash County, approximately 14 percent of households are below the poverty level. It is especially difficult for this segment of the population to afford and maintain a home.

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

In 1999, the NLIHC estimated that 43 percent of renters paid more than 30 percent of their income for housing costs, as compared to 44 percent for the State of Illinois. An individual would either need to earn 140 percent of the federal minimum wage (based on a 40-hour workweek) or work a 56-hour workweek to afford the fair market rent of approximately \$374.

We identified the credit and non-credit related needs in this AA to be small business loans of less than \$10,000 for prospective new businesses and counseling for prospective small business owners.

We determined these community needs by contacting a representative from a housing authority and an economic development director for the city of Mount Carmel.

We determined that the opportunity to make CD loans and qualified investments, and to provide CD services within this AA is limited. These opportunities include affordable mortgage housing bonds offered through the State of Illinois and numerous non-profit organizations that provide social services to low- and moderate-income individuals. Our research revealed that the opportunity to make qualified investments other than donations and grants was extremely limited. Opportunities for partnerships are also limited.



**State of Indiana Full-Scope Area**  
**(Bloomington, Indiana MSA)**

Demographic Information for Full-Scope Area: Bloomington, Indiana MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	20	10%	30%	30%	30%	0%
Population by Geography	108,978	14%	28%	34%	24%	0%
Owner-Occupied Housing by Geography	21,555	<1%	20%	51%	29%	0%
Businesses by Geography	4,124	4%	43%	29%	24%	0%
Farms by Geography	160	0%	10%	77%	13%	0%
Family Distribution by Income Level	23,121	20%	17%	24%	39%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	8,467	7%	37%	42%	14%	0%
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$32,859 = \$47,500 = 19.1%	Median Housing Value Unemployment Rate (October 2000)				= \$62,652 = 1.1%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

ONB's AA consists of the entire Bloomington MSA. ONB has five branch offices and ten ATMs located in the MSA. The ATMs are located at each ONB office and at five off premise sites. As of June 30, 2000, 3 percent of ONB's deposits were derived from this MSA. Over the evaluation period, 10 percent of home mortgage loans, 4 percent of small loans to businesses, and 0.2 percent of small loans to farms were derived from this AA.

ONB's deposits in the Bloomington MSA total approximately \$161 million. Based on FDIC deposit market share data as of June 30, 2000, this equates to a 14 percent deposit market share that ranks ONB as the third largest deposit taking institution in the MSA.

The Bloomington MSA is located in south central Indiana. The local economy is good with service and manufacturing being the two major industries. The unemployment rate for the MSA is low at 1.1 percent, as compared to 2.1 percent for the State of Indiana. Non-agricultural wage and salaried employment has risen moderately from 51,862 in 1991 to 59,445 in 1999, an increase of 15 percent. The two major employers are Indiana University and Bloomington Hospital and Health System. Some large manufacturing firms have ceased their operations in the area or have reduced their staff in recent years. These include RCA and General Electric.

In the Bloomington MSA, approximately 19 percent of households are below the poverty level. It is especially difficult for this segment of the population to afford and maintain a home.

Housing in the Bloomington MSA is not affordable. Based on current interest rates, the updated HUD median family income of \$47,500, and traditional lending terms, an individual who earns 50 percent or more (i.e. moderate-income and above) of the median family income would be able to afford to purchase a \$70,000 home within the Bloomington MSA. However, the average sales price of homes in the Bloomington MSA was \$121,000 in 2000. Only 299 (21 percent) of the 1,458 homes that sold in 2000 were for less than \$70,000. Consequently, it would be difficult for a low-income individual to locate and afford a home.

In 1999, the NLIHC estimates that 59 percent of renters paid more than 30 percent of their income for housing costs, as compared to 40 percent for the State of Indiana. The Bloomington MSA was listed as one of the least affordable metro areas to rent based on the percentage of renters who are unable to afford a two-bedroom apartment. An individual would either need to earn 236 percent of the federal minimum wage (based on a 40-hour workweek) or work a 94-hour workweek to afford the fair market rent of \$631.

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

The Bloomington MSA has two low-income census tracts (i.e. 2.01 and 2.02). Dunn and Bradstreet data indicates that 153 businesses are located in these two census tracts. However, these tracts primarily consist of student housing for Indiana University and contain relatively few businesses. Consequently, the opportunity to make small loans to businesses in these two census tracts is minimal.

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

- Affordable housing (i.e. single family rental, multifamily rental, home ownership, rehabilitation, and homeless shelters) for low- and moderate-income individuals. Public and rental assisted housing and down payment assistance were also identified as needs.
- Small business loans of under \$25,000 with lower interest rates and more liberal collateral requirements.
- Social services to low- and moderate-income families including child care services, youth recreational facilities, job training, and health care services.

We determined these community needs by contacting representatives from a non- profit housing organization, small business development

center, and an association of realtors. We also reviewed the HUD Consolidated Strategy and Plan for the city of Bloomington.

We determined that the opportunity to make CD loans and qualified investments, and to provide CD services within this AA is moderate.

These opportunities include low-income housing tax credits, community development corporations, community housing development organizations, non-profit housing organizations, credit counseling agencies, small business development centers, affordable housing mortgage bonds, and non-profit organizations that provide social services to low- and moderate-income individuals. Overall, opportunities for partnerships are moderate. Competition for CD loans, qualified investments, and CD services is moderate and consists primarily of two other financial institutions that have a greater presence in the MSA than ONB, as a percentage of deposit market share.

## State of Indiana Full-Scope Area

(Daviess, Dubois, Knox, and Martin Counties,  
Indiana)

Demographic Information for Full-Scope Area: Daviess, Dubois, Knox, and Martin Counties, Indiana						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	28	NA	14%	72%	14%	0%
Population by Geography	114,402	NA	14%	70%	16%	0%
Owner-Occupied Housing by Geography	31,878	NA	12%	71%	17%	0%
Businesses by Geography	4,563	NA	15%	64%	21%	0%
Farms by Geography	1,134	NA	10%	75%	15%	0%
Family Distribution by Income Level	30,637	19%	19%	25%	37%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	11,567	NA	18%	72%	10%	0%
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$30,800 = \$46,000 = 13.8%	Median Housing Value Unemployment Rate (October 2000)				= \$45,370 = 1.9%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

ONB's AA consists of Daviess, Dubois, Knox, and Martin Counties. ONB has 19 branch offices and 26 ATMs located in the AA. The ATMs are located at 16 of the 19 branch offices and at 10 off premise sites. As of June 30, 2000, 12 percent of ONB's deposits were derived from this AA. Over the evaluation period, 4 percent of home mortgage loans, 10 percent of small loans to businesses, and 20 percent of small loans to farms were derived from this AA.

ONB's deposits in the AA total approximately \$598 million. Based on FDIC deposit market share data as of June 30, 2000, this equates to a 31 percent deposit market share that ranks ONB as the largest deposit taking institution in the AA.

This four county area is located in southwestern Indiana. The local economy is stable with a slight expansion. The two major industries are manufacturing and agriculture. The unemployment rate for the AA ranges from 1.2 percent in Dubois County to 2.5 percent in Knox County, as compared to 2.1 percent for the State of Indiana. Non-agricultural wage and salaried employment has risen moderately from 52,705 in 1991 to 59,076 in 1999, an increase of 12 percent. Two manufacturing firms (i.e. Vincennes Manufacturing and Johnson Control) recently ceased operations in the AA that caused approximately 500 individuals to lose their jobs. However, new manufacturing companies have opened for business. The largest is Cornwitt Milling. It's anticipated it will employ approximately 130 individuals, 90 of which will be hourly jobs with an average hourly

range of \$12.50 to \$15.00 per hour.

In Daviess, Dubois, Knox, and Martin Counties, approximately 14 percent of households are below the poverty level. It is especially difficult for this segment of the population to afford and maintain a home.

In 1999, the NLIHC estimated that 41 percent, 28 percent, 45 percent, and 45 percent of renters in Daviess, Dubois, Knox, and Martin Counties respectively, paid more than 30 percent of their income for housing costs, as compared to 40 percent for the State of Indiana. An individual would either need to earn approximately 150 percent of the federal minimum wage (based on a 40-hour workweek) or work approximately a 60-hour workweek to afford the fair market rent of approximately \$400.

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

- Affordable housing (i.e. multifamily rental assisted, single family rental, and rehabilitation) for low- and moderate-income individuals.
- Working capital loans for prospective new small businesses.

We determined these community needs by contacting representatives from a housing authority and economic development agency.

We determined that the opportunity to make CD loans and qualified investments, and to provide CD services within this AA is limited.

These opportunities include a community housing development organization, non-profit housing organizations, and non-profit organizations that provide social services to low- and moderate-income individuals. Our research revealed that the opportunity to make qualified investments other than donations and grants is extremely limited. Opportunities for partnerships are also limited.

**State of Indiana Full-Scope Area  
(Terre Haute, Indiana MSA)**

Demographic Information for Full-Scope Area: Terre Haute, Indiana MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	34	3%	32%	44%	21%	0%
Population by Geography	122,880	<1%	26%	47%	27%	0%
Owner-Occupied Housing by Geography	32,888	<1%	23%	52%	25%	0%
Businesses by Geography	4,052	8%	26%	44%	22%	0%
Farms by Geography	346	1%	4%	58%	37%	0%
Family Distribution by Income Level	31,565	19%	19%	23%	39%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	12,144	<1%	39%	46%	15%	0%
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$29,561 = \$43,000 = 15.2%	Median Housing Value Unemployment Rate (October 2000)				= \$40,816 = 3.4%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

ONB's AA consists of two (Vigo and Vermillion) of the three counties that comprise the Terre Haute MSA. It does not include Clay County. ONB has ten branch offices and eighteen ATMs located in the MSA. The ATMs are located at eight of the ten branch offices and at ten off premise sites. As of June 30, 2000, 7 percent of ONB's deposits were derived from this MSA. Over the evaluation period, 18 percent of home mortgage loans, 6 percent of small loans to businesses, and 1 percent of small loans to farms were derived from this AA.

ONB's deposits in the Terre Haute MSA total approximately \$363 million. Based on FDIC deposit market share data as of June 30, 2000, this equates to a 24 percent deposit market share that ranks ONB as the second largest deposit taking institution in the MSA.

The city of Terre Haute (Vigo County) is located approximately ten miles east of the Indiana - Illinois state line on the eastern banks of the Wabash River. The city is approximately 70 miles southwest of Indianapolis and is the county seat of Vigo County. Major industries include higher education, manufacturing, aerospace, and high-tech machinery products. Major employers include CBS Columbia House, Digital Audio Disc Corporation, Bemis Corporation, and Indiana State University. The unemployment rate for the MSA was 3.4 percent, as compared to 2.1 percent for the State of Indiana. In the Terre Haute MSA, approximately 15 percent of households are

below the poverty level. It is especially difficult for this segment of the population to afford and maintain a home.

The local economy is stable with limited employment growth. Non-agricultural wage and salaried employment has only risen from 64,354 in 1991 to 65,446 in 1999, an increase of 2 percent. It's anticipated a new 1,500-acre industrial park in Terre Haute will significantly improve the local economy by creating new jobs. The industrial park is part of an economic development plan supported by Vigo County. Seven new businesses have located in the industrial park and it's anticipated 1,000 new jobs will be created by yearend 2001. The majority of the employees will receive wages ranging from \$9 to \$20 per hour.

Included in this AA is an Indiana designated Enterprise Zone located in Terre Haute, Indiana. The Enterprise Zone covers approximately one third of the city. Recent projects within the Enterprise Zone include a transitional shelter for the homeless, assisted living for the elderly and disabled, single family homes for low-income individuals, renovation of storefronts located in downtown, and apartments in the upper floors of downtown businesses. The above projects were funded by tax credit dollars, state and local grants, and loans from financial institutions. Additionally, The Center City project, located in downtown Terre Haute, has recently opened. It houses approximately 20,000-sq. ft. of retail shops and 33 1-bedroom and 2-bedroom apartments. The apartments are rented at the market rate. The above and other projects were the result of numerous tax benefits and incentives, and loan and grant programs administered through the Department of Redevelopment for areas within the Enterprise Zone.

Housing in the Terre Haute MSA is affordable. Based on current interest rates, the updated HUD median family income of \$43,000, and traditional lending terms, an individual who earns 50 percent or more (i.e. moderate-income and above) of the median family income would be able to afford to purchase a \$70,000 home within the Terre Haute MSA. In 2000, the median sales price of homes in Vigo and Vermillion County were \$70,000 and \$48,750, respectively.

In Vigo County, 612 (50 percent) of the 1,213 homes that sold in 2000 were for \$70,000 or less. In Vermillion County, 83 (70 percent) of the 118 homes that sold in 2000 were for \$70,000 or less.

In 1999, the NLIHC estimated that 44 percent of renters paid more than 30 percent of their income for housing costs, as compared to 40 percent for the State of Indiana. An individual would either need to earn 159 percent of the federal minimum wage (based on a 40-hour workweek) or work a 64-hour workweek to afford the fair market rent of \$427.

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

- Affordable housing (i.e. single family rental, multifamily rental, home ownership, rehabilitation, and homeless shelters)

for low- and moderate-income individuals. Public and rental assisted housing and down payment assistance were also identified as needs.

- Small business loans and technical assistance for new businesses were identified as needs.
- Social services to low- and moderate-income families including child care services, counseling and job training, credit and home ownership counseling, food donation, and health care services.

We determined these community needs by contacting representatives from a local non-profit housing organization, redevelopment agency, and association of realtors. We also reviewed the HUD Consolidated Strategy and Plan for the city of Terre Haute, Indiana.

We determined that the opportunity to make CD loans and qualified investments, and to provide CD services within this AA is moderate. These opportunities include low-income housing tax credits, community development corporations, non-profit housing organizations, credit counseling agencies, small business development centers, affordable housing mortgage bonds, and non-profit organizations that provide social services to low- and moderate-income individuals. Overall, opportunities for partnerships are moderate. Competition for CD loans, qualified investments, and CD services is moderate and consists primarily of two other financial institutions that have the largest and third largest deposit market share within the MSA.



## State of Kentucky Full-Scope Area

### (Hopkins and Muhlenberg Counties, Kentucky)

Demographic Information for Full-Scope Area: Hopkins and Muhlenberg Counties, Kentucky						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	22	NA	4%	64%	32%	0%
Population by Geography	74,444	NA	1%	65%	34%	0%
Owner-Occupied Housing by Geography	22,803	NA	1%	65%	34%	0%
Businesses by Geography	2,657	NA	2%	63%	35%	0%
Farms by Geography	199	NA	0%	51%	49%	0%
Family Distribution by Income Level	22,430	19%	16%	18%	47%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	7,869	NA	2%	73%	25%	0%
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$22,542 = \$34,600 = 19.1%	Median Housing Value Unemployment Rate (October 2000)				= \$39,032 = 6.1%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

ONB's AA consists of all of Hopkins and Muhlenberg Counties. ONB has eight branch offices and eight ATMs located in the AA. The ATMs are located at seven of the eight branch offices and at one off premise site. As of June 30, 2000, 6 percent of ONB's deposits were derived from this AA. Over the evaluation period, 5 percent of home mortgage loans, 9 percent of small loans to businesses, and 5 percent of small loans to farms were derived from this AA.

ONB's deposits in the AA total approximately \$294 million. Based on FDIC deposit market share data as of June 30, 2000, this equates to a 35 percent deposit market share that ranks ONB as the largest deposit taking institution in the AA.

This two county area is located in western Kentucky. The local economy is depressed. Prior to 1985, coal mining and related businesses accounted for approximately 70 percent of all employment. Most workers went from high school into the coal mines and made approximately \$40,000 to \$50,000 per year. Hopkins and Muhlenberg Counties were the largest coal producing counties in the country until the federal government closed down many of the mines due to air pollution problems. There was a gradual decline in coal mining and related businesses from 1985 to 1990 that created a significant loss of jobs. Consequently, many individuals were forced to obtain lower paying jobs. Presently, coal mining and related fields account for only 10 percent of all jobs. Currently, the two major industries are services and retail trade. The unemployment rate for the AA is high at 6.1 percent, compared to

3.9 percent for the State of Kentucky. Non-agricultural wage and salaried employment has risen minimally from 29,931 in 1991 to 30,251 in 1999, an increase of 1 percent. The three largest employers are General Electric Aircraft Engines, Carhartt, Inc., and D A M E Manufacturing.

In the Hopkins and Muhlenberg Counties AA, approximately 19 percent of households are below the poverty level. It is especially difficult for this segment of the population to afford and maintain a home.

In 1999, the NLIHC estimated that 43 percent and 48 percent of renters in Hopkins and Muhlenberg Counties, respectively, paid more than 30 percent of their income for housing costs, as compared to 41 percent for the State of Kentucky. An individual would either need to earn 134 percent of the federal minimum wage (based on a 40-hour workweek) or work a 54-hour workweek to afford the fair market rent of approximately \$360.

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

- Affordable housing (i.e. single family rental, home ownership, and rehabilitation) for low- and moderate-income individuals. Public and rental assisted housing were also identified as needs.
- Job training for ex-coal miners, health care, and public transportation.

We determined these community needs by contacting representatives from a housing authority, non-profit housing agency, and non-profit organization that provides social services to low- and moderate-income individuals.

We determined that the opportunity to make CD loans and qualified investments, and to provide CD services within this AA is limited. These opportunities include non-profit organizations that provide social services to low- and moderate-income individuals and a consumer credit counseling agency. Our research revealed that the opportunity to make qualified investments other than donations and grants was extremely limited. Opportunities for partnerships are also limited.

# Appendix D: Tables of Performance Data

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**Tables of Performance Data**

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- State of Indiana.....D-25
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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: purchased loans are treated as originations/purchases and market share in 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 MSA/AA.

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 MSA/AA.

**Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies to the percent distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

**Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.

**Table 4. Geographic Distribution of Refinance Loans** - See Table 2.

**Table 5. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies compared to the percent 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.

**Table 6. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

**Table 7. 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 MSA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

**Table 8. Borrower Distribution of Home Improvement Loans** - See Table 7.

**Table 9. Borrower Distribution of Refinance Loans** - See Table 7.

**Table 10. 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 11. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/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 have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.

**Table 13. 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 MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

**Table 1. Lending Volume**

LENDING VOLUME												Multistate Metropolitan Area	
MSA/Assessment Area	% of Rated Area Deposits in MSA/AA *	Home Mortgage**		Small Loans to Businesses**		Small Loans to Farms**		Community Development***		Total Reported Loans		% of Rated Area Loans (#) in MSA/AA	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
Full-Scope:													
Evansville, IN - Henderson, KY MSA	100%	4,657	\$378,026	2,861	\$257,856	253	\$14,272	18	\$9,590	7,789	\$659,744	100%	

(\*) Deposit data as of June 30, 2000.

(\*\*) The evaluation period for Home Mortgage Loans, Small Loans to Businesses and Small Loans to Farms is April 1, 1998 to December 31, 2000.

(\*\*\*) The evaluation period for Community Development Loans is April 15, 1998 to January 2, 2001.

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

Geographic Distribution: HOME PURCHASE															
Multistate Metropolitan Area															
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000															
MSA/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
Full-Scope:															
Evansville, IN - Henderson, KY MSA	2,470	100%	1%	1%	19%	11%	47%	39%	33%	49%	14.86	14.49	10.61	15.11	16.13

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

(\*\*) Percentage of Owner-Occupied units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census Information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

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

Geographic Distribution: HOME IMPROVEMENT															
Multistate Metropolitan Area		Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000													
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share by Geography***				
	#	% of Total *	% Owner Occ Units*	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units*	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full-Scope:															
Evansville, IN - Henderson, KY MSA	695	100%	1%	1%	19%	27%	47%	39%	33%	33%	24.6 3	33.3 3	26.2 6	22.0 6	26.7 1

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

(\*\*) Percentage of Owner-Occupied units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census Information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

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

Geographic Distribution: HOME MORTGAGE REFINANCE															
Metropolitan Area		Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000													
MSA/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	Over all	Low	Mod	Mid	Upp
Full-Scope:															
Evansville, IN - Henderson, KY MSA	1,477	100%	1%	1%	19%	9%	47%	51%	33%	39%	9.33	9.09	3.74	11.7 7	9.66

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



loans originated/purchased in the rated area.

(\*\*) Percentage of Owner-Occupied units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census Information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 5. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES															Multistate Metropolitan Area				
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000																			
MSA/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 Busines sses **	% BANK Loans	% of Busines sses **	% BANK Loans	% of Busines sses **	% BANK Loans	% of Busines sses **	% BANK Loans	Over all	Low	Mod	Mid	Upp				
Full-Scope:																			
Evansville, IN - Henderson, KY MSA	2,861	100%	2%	1%	22%	21%	51%	45%	25%	33%	26.30	14.93	27.24	25.92	26.77				

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

(\*\*) Source of Data-Dunn and Bradstreet

(\*\*\*) Based on 1999 Aggregate Small Business Data only.

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

Geographic Distribution: SMALL LOANS TO FARMS															Multistate Metropolitan Area				
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000																			
MSA/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	Over all	Low	Mod	Mid	Upp				
Full-Scope:																			
Evansville, IN - Henderson, KY MSA	253	100%	1%	0%	4%	0%	62%	70%	33%	30%	58.37	0.00	0.00	56.47	64.61				

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

(\*\*) Source of Data-Dunn and Bradstreet

(\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE															Multistate				
Metropolitan Area															Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000				
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share by Geography****								
	#	% of Total*	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp				
Full-Scope:																			
Evansville, IN - Henderson, KY MSA	2,470	100%	19%	9%	18%	20%	24%	23%	39%	44%	14.86	14.69	13.15	13.54	19.48				

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

(\*\*) Percentage of Families is based on 1990 Census Information.

(\*\*\*) As a percentage of loans with borrower income information available.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

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

Borrower Distribution: HOME IMPROVEMENT															Multistate				
Metropolitan Area															Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000				
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share by Geography****								
	#	% of Total*	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp				
Full-Scope:																			
Evansville, IN - Henderson, KY MSA	695	100%	19%	17%	18%	22%	24%	26%	39%	35%	24.63	26.39	25.38	22.04	26.43				

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

(\*\*) Percentage of Families is based on 1990 Census Information.

(\*\*\*) As a percentage of loans with borrower income information available.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE															Multistate				
Metropolitan Area		Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000																	
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share by Geography****								
	#	% of Total*	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp				
Full-Scope:																			
Evansville, IN - Henderson, KY MSA	1,477	100%	19%	8%	18%	14%	24%	26%	39%	47%	9.33	6.46	7.05	8.97	16.60				

(\*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated/purchased in the rated area.  
 (\*\*) Percentage of Families is based on 1990 Census Information.  
 (\*\*\*) As a percentage of loans with borrower income information available.  
 (\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 10. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES										Multistate Metropolitan Area	
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000											
MSA/Assessment Area:	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****			
	#	% of Total*	% of Businesses*	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less		
Full-Scope:											
Evansville, IN - Henderson, KY MSA	2,861	100%	86%	68%	78%	13%	9%	26.30	25.53		

(\*) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated/purchased in the rated area.  
 (\*\*) Businesses with revenues of \$1 million or less as a percentage of all businesses.

(\*\*\*) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.  
 (\*\*\*\*) Based on 1999 Aggregate Small Business Data only.

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

Borrower Distribution: SMALL LOANS TO FARMS		Multistate Metropolitan Area							
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000									
MSA/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
Full-Scope:									
Evansville, IN - Henderson, KY MSA	253	100%	99%	98%	85%	12%	3%	58.37	58.26

(\*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated/purchased in the rated area.  
 (\*\*) Farms with revenues of \$1 million or less as a percentage of all farms.  
 (\*\*\*) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.  
 (\*\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		Multistate Metropolitan Area							
Evaluation Period: APRIL 15, 1998 TO JANUARY 2, 2001									
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total \$'s	#	\$(000's)
Full-Scope:									
Evansville, IN - Henderson, KY MSA	2	\$657	44	\$5,988	46	\$6,645	100%	0	0

(\*) "Prior Period Investments" means investments made in a previous evaluation period that are outstanding as of the

examination date.

(\*\*) "Unfunded Commitments" means legally binding investment commitments that are tracked and reported by the bank's financial reporting system.

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Multistate Metropolitan Area									
Evaluation Period: APRIL 15, 1998 TO JANUARY 2, 2001																	
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Lo w	Mod	Mid	Upp	Lo w	Mo d	Mi d	Up p
Full-Scope:																	
Evansville, IN - Henderson, KY MSA	100%	24	100%	0%	29%	58%	13%	1	0	0	0	-1	0	2%	22%	46%	30%

Table 1. Lending Volume

LENDING VOLUME												State: Illinois	
Area:	MSA/Assessment	% of Rated Area Deposits in MSA/AA *	Home Mortgage**		Small Loans to Businesses**		Small Loans to Farms**		Community Development***		Total Reported Loans		% of Rated Area Loans (#) in MSA/AA
			#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full-Scope:</b>													
Vermilion County		35%	195	\$8,599	434	\$26,313	165	\$12,152	3	\$1,082	797	\$48,146	25%
Wabash County		13%	140	\$5,873	96	\$5,820	40	\$2,285	0	\$0	276	\$13,978	9%
<b>Limited-Scope:</b>													
Clark County		5%	100	\$6,667	68	\$3,081	70	\$3,206	0	\$0	238	\$12,954	8%
Crawford County		9%	97	\$5,068	110	\$5,281	218	\$11,023	0	\$0	425	\$21,372	13%
Lawrence County		9%	138	\$5,803	144	\$8,378	165	\$11,782	0	\$0	447	\$25,963	14%
Saline County		20%	193	\$5,441	276	\$12,081	84	\$3,572	0	\$0	553	\$21,094	17%
White County		9%	123	\$3,941	178	\$7,546	128	\$6,191	0	\$0	429	\$17,678	14%

(\*) Deposit data as of June 30, 2000.

(\*\*) The evaluation period for Home Mortgage Loans, Small Loans to Businesses and Small Loans to Farms is April 1, 1998 to December 31, 2000.

(\*\*\*) The evaluation period for Community Development Loans is April 15, 1998 to January 2, 2001.

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

Geographic Distribution: HOME PURCHASE															
State: Illinois			Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000												
MSA/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
Full-Scope:															
Vermilion County	74	17%	NA	NA	14%	12%	66%	51%	20%	37%	NA	NA	NA	NA	NA
Wabash County	54	13%	NA	NA	NA	NA	76%	63%	24%	37%	NA	NA	NA	NA	NA
Limited-Scope:															
Clark County	46	11%	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA	NA	NA
Crawford County	52	12%	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA	NA	NA
Lawrence County	67	16%	NA	NA	52%	67%	48%	33%	NA	NA	NA	NA	NA	NA	NA
Saline County	82	19%	NA	NA	41%	41%	59%	59%	NA	NA	NA	NA	NA	NA	NA
White County	49	12%	NA	NA	17%	14%	83%	86%	NA	NA	28.3 8	NA	40.0 0	25.5 6	NA

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

(\*\*) Percentage of Owner-Occupied units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census Information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.



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

MSA/Assessment Area:		Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share by Geography***				
		#	% of Total *	% Owner Occ Units*	% BANK Loans	% Owner Occ Units **	% BANK Loans	% Owner Occ Units **	% BANK Loans	% Owner Occ Units*	% BANK Loans	Over all	Low	Mod	Mid	Upp
Geographic Distribution: HOME IMPROVEMENT Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000 State: Illinois																
Full-Scope:																
Vermilion County	81	27%	NA	NA	14%	11%	66%	56%	20%	33%	NA	NA	NA	NA	NA	
Wabash County	38	13%	NA	NA	NA	NA	76%	76%	24%	24%	NA	NA	NA	NA	NA	
Limited-Scope:																
Clark County	17	6%	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA	NA	NA	
Crawford County	8	3%	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA	NA	NA	
Lawrence County	35	11%	NA	NA	52%	74%	48%	26%	NA	NA	NA	NA	NA	NA	NA	
Saline County	71	23%	NA	NA	41%	32%	59%	68%	NA	NA	NA	NA	NA	NA	NA	
White County	52	17%	NA	NA	17%	13%	83%	87%	NA	NA	58.9 7	NA	33.3 3	61.1 1	NA	

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

(\*\*) Percentage of Owner-Occupied units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census Information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

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

Geographic Distribution: HOME MORTGAGE REFINANCE State:															
Illinois Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000															
MSA/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	Over all	Low	Mod	Mid	Upp
Full-Scope:															
Vermilion County	40	16%	NA	NA	14%	10%	66%	60%	20%	30%	NA	NA	NA	NA	NA
Wabash County	47	18%	NA	NA	NA	NA	76%	79%	24%	21%	NA	NA	NA	NA	NA
Limited-Scope:															
Clark County	37	14%	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA	NA	NA
Crawford County	37	14%	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA	NA	NA
Lawrence County	35	14%	NA	NA	52%	54%	48%	46%	NA	NA	NA	NA	NA	NA	NA
Saline County	40	15%	NA	NA	41%	13%	59%	87%	NA	NA	NA	NA	NA	NA	NA
White County	22	9%	NA	NA	17%	14%	83%	86%	NA	NA	22.2 2	NA	20.0 0	22.6 7	NA

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

(\*\*) Percentage of Owner-Occupied units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census Information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 5. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000											State: Illinois				
MSA/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 Busines sses **	% BANK Loans	% of Busines sses **	% BANK Loans	% of Busines sses **	% BANK Loans	% of Busines sses **	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full-Scope:															
Vermilion County	434	33%	NA	NA	29%	19%	57%	50%	14%	31%	30.0 5	NA	33.1 0	28.0 2	32.4 7
Wabash County	96	7%	NA	NA	NA	NA	74%	75%	26%	25%	17.5 1	NA	NA	13.6 4	17.9 1
Limited-Scope:															
Clark County	68	5%	NA	NA	NA	NA	100%	100%	NA	NA	8.31	NA	NA	8.58	NA
Crawford County	110	9%	NA	NA	NA	NA	100%	100%	NA	NA	11.5 1	NA	NA	11.5 1	NA
Lawrence County	144	11%	NA	NA	78%	60%	22%	40%	NA	NA	22.7 9	NA	31.2 1	16.1 5	NA
Saline County	276	21%	NA	NA	61%	36%	39%	64%	NA	NA	51.3 3	NA	48.1 1	53.1 9	NA
White County	178	14%	NA	NA	22%	8%	78%	92%	NA	NA	28.0 3	NA	12.0 7	31.1 1	NA

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

(\*\*) Source of Data-Dunn and Bradstreet

(\*\*\*) Based on 1999 Aggregate Small Business Data only.

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

Geographic Distribution: SMALL LOANS TO FARMS											State: Illinois				
											Evaluation Period: April 1, 1998 TO DECEMBER 31, 2000				
MSA/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	Over all	Low	Mod	Mid	Upp
Full-Scope:															
Vermilion County	165	19%	NA	NA	3%	1%	85%	95%	12%	4%	50.3 2	NA	100	53.90	13.33
Wabash County	40	4%	NA	NA	NA	NA	29%	75%	71%	25%	34.7 8	NA	NA	27.59	0.00
Limited-Scope:															
Clark County	70	8%	NA	NA	NA	NA	100%	100%	NA	NA	18.8 2	NA	NA	18.9 7	NA
Crawford County	218	25%	NA	NA	NA	NA	100%	100%	NA	NA	44.7 2	NA	NA	44.7 2	NA
Lawrence County	165	19%	NA	NA	61%	38%	39%	62%	NA	NA	55.4 8	NA	50.0 0	59.3 4	NA
Saline County	84	10%	NA	NA	21%	10%	79%	90%	NA	NA	91.8 4	NA	66.6 7	93.1 8	NA
White County	128	15%	NA	NA	2%	3%	98%	97%	NA	NA	31.8 7	NA	50.0 0	31.0 7	NA

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

(\*\*) Source of Data-Dunn and Bradstreet

(\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE											State: Illinois				
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000															
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share by Geography****				
	#	% of Total*	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp
Full-Scope:															
Vermilion County	74	17%	20%	5%	18%	24%	21%	28%	41%	42%	NA	NA	NA	NA	NA
Wabash County	54	13%	20%	9%	15%	20%	23%	26%	42%	43%	NA	NA	NA	NA	NA
Limited-Scope:															
Vermilion County	46	11%	19%	7%	21%	20%	25%	30%	35%	37%	NA	NA	NA	NA	NA
Wabash County	52	12%	17%	13%	21%	27%	25%	27%	37%	33%	NA	NA	NA	NA	NA
Lawrence County	67	16%	26%	6%	24%	19%	21%	37%	29%	33%	NA	NA	NA	NA	NA
Saline County	82	19%	29%	17%	19%	27%	20%	29%	32%	27%	NA	NA	NA	NA	NA
White County	49	12%	26%	14%	19%	22%	24%	33%	31%	29%	28.38	14.29	31.58	22.73	50.00

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

(\*\*) Percentage of Families is based on 1990 Census Information.

(\*\*\*) As a percentage of loans with borrower income information available.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

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

Borrower Distribution: HOME IMPROVEMENT												State: Illinois				
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000																
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share by Geography****					
	#	% of Total*	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp	
Full-Scope:																
Vermilion County	81	27%	20%	7%	18%	15%	21%	26%	41%	52%	NA	NA	NA	NA	NA	
Wabash County	38	13%	20%	10%	15%	13%	23%	24%	42%	53%	NA	NA	NA	NA	NA	
Limited-Scope:																
Clark County	17	6%	19%	0%	21%	35%	25%	29%	35%	29%	NA	NA	NA	NA	NA	
Crawford County	8	3%	17%	25%	21%	25%	25%	0%	37%	50%	NA	NA	NA	NA	NA	
Lawrence County	35	11%	26%	6%	24%	14%	21%	37%	29%	40%	NA	NA	NA	NA	NA	
Saline County	71	23%	29%	18%	19%	18%	20%	34%	32%	30%	NA	NA	NA	NA	NA	
White County	52	17%	26%	8%	19%	11%	24%	33%	31%	48%	58.97	28.57	40.00	45.45	87.50	

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

(\*\*) Percentage of Families is based on 1990 Census Information.

(\*\*\*) As a percentage of loans with borrower income information available.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE State: Illinois Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000															
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share by Geography****				
	#	% of Total*	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp
Full-Scope:															
Vermilion County	40	16%	20%	8%	18%	25%	21%	25%	41%	42%	NA	NA	NA	NA	NA
Wabash County	47	18%	20%	11%	15%	17%	23%	34%	42%	32%	NA	NA	NA	NA	NA
Limited-Scope:															
Clark County	37	14%	19%	3%	21%	22%	25%	32%	35%	38%	NA	NA	NA	NA	NA
Crawford County	37	14%	17%	5%	21%	33%	25%	24%	37%	38%	NA	NA	NA	NA	NA
Lawrence County	35	14%	26%	20%	24%	11%	21%	23%	29%	46%	NA	NA	NA	NA	NA
Saline County	40	15%	29%	10%	19%	28%	20%	35%	32%	27%	NA	NA	NA	NA	NA
White County	22	9%	26%	0%	19%	32%	24%	41%	31%	27%	22.2 2	0	31.58	25.0 0	36.0 0

(\*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated/purchased in the rated area.  
 (\*\*) Percentage of Families is based on 1990 Census Information.  
 (\*\*\*) As a percentage of loans with borrower income information available.  
 (\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 10. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		State: Illinois							
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000									
MSA/Assessment Area:	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses*	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Scope:									
Vermilion County	434	33%	90%	75%	86%	9%	5%	30.05	31.52
Wabash County	96	7%	88%	91%	81%	13%	6%	17.51	18.96
Limited-Scope:									
Clark County	68	5%	92%	88%	90%	6%	4%	8.31	8.52
Crawford County	110	9%	92%	93%	88%	9%	3%	11.51	14.84
Lawrence County	144	11%	89%	88%	84%	10%	6%	22.79	35.71
Saline County	276	21%	89%	97%	90%	6%	4%	51.33	62.13
White County	178	14%	90%	82%	93%	6%	1%	28.03	28.26

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

(\*\*) Businesses with revenues of \$1 million or less as a percentage of all businesses.

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

(\*\*\*\*) Based on 1999 Aggregate Small Business Data only.





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

Borrower Distribution: SMALL LOANS TO FARMS Illinois		Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000						State:	
MSA/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
Full-Scope:									
Vermilion County	165	19%	100%	97%	72%	24%	4%	50.32	49.67
Wabash County	40	4%	100%	95%	80%	20%	0%	34.78	34.78
Limited-Scope:									
Clark County	70	8%	99%	100%	87%	12%	1%	18.82	21.92
Crawford County	218	25%	100%	95%	89%	9%	2%	44.72	46.48
Lawrence County	165	19%	98%	97%	76%	20%	4%	55.48	54.97
Saline County	84	10%	100%	100%	92%	6%	2%	91.84	91.84
White County	128	15%	97%	98%	86%	12%	2%	31.87	31.49

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

(\*\*) Farms with revenues of \$1 million or less as a percentage of all farms.

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

(\*\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		State: Illinois							
Evaluation Period: APRIL 15, 1998 TO JANUARY 2, 2001									
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Scope:									
Vermilion County	1	\$25	13	\$47	14	\$72	46%	0	0
Wabash County	1	\$9	5	\$8	6	\$17	11%	0	0
Limited-Scope:									
Clark County	1	\$3	0	0	1	\$3	2%	0	0
Crawford County	1	\$6	1	\$7	2	\$13	8%	0	0
Lawrence County	1	\$6	0	0	1	\$6	4%	0	0
Saline County	1	\$14	0	0	1	\$14	9%	0	0
White County	1	\$6	1	\$25	2	\$31	20%	1	\$75

(\*) "Prior Period Investments" means investments made in a previous evaluation period that are outstanding as of the examination date

(\*\*) "Unfunded Commitments" means legally binding investment commitments that are tracked and reported by the bank's financial reporting system.

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										State: Illinois							
Evaluation Period: APRIL 15, 1998 TO JANUARY 2, 2001																	
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
Vermilion County	35%	7	46%	NA	29%	57%	14%	0	0	NA	NA	NA	NA	NA	17%	64%	19%
Wabash County	13%	1	7%	NA	NA	100%	0%	1	0	NA	NA	0	-1	NA	NA	76%	24%
Limited-Scope:																	
Clark County	5%	1	7%	NA	NA	100%	NA	0	0	NA	NA	NA	NA	NA	NA	100%	NA
Crawford County	9%	2	13%	NA	NA	100%	NA	0	0	NA	NA	NA	NA	NA	NA	100%	NA
Lawrence County	9%	1	7%	NA	100%	0%	NA	0	0	NA	NA	NA	NA	NA	54%	46%	NA
Saline County	20%	1	7%	NA	100%	0%	NA	0	0	NA	NA	NA	NA	NA	42%	58%	NA
White County	9%	2	13%	NA	0%	100%	NA	0	0	NA	NA	NA	NA	NA	19%	81%	NA

Table 1. Lending Volume

LENDING VOLUME												State: Indiana	
MSA/Assessment Area:	% of Rated Area Deposits in MSA/AA *	Home Mortgage**		Small Loans to Businesses**		Small Loans to Farms**		Community Development***		Total Reported Loans		% of Rated Area Loans (#) in MSA/AA	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
Full-Scope:													
Bloomington MSA	10%	1,123	\$129,750	300	\$42,070	6	\$405	3	\$690	1,432	\$172,915	16%	
Daviess, Dubois, Knox, & Martin Counties	37%	472	\$22,945	792	\$55,725	518	\$27,951	4	\$1,624	1,786	\$108,245	20%	
Terre Haute MSA	23%	2,054	\$142,339	434	\$40,871	33	\$2,675	8	\$21,025	2,529	\$206,910	28%	
Limited-Scope:													
Fountain & Warren Counties	7%	103	\$4,438	306	\$12,145	210	\$11,925	0	\$0	619	\$28,508	7%	
Gibson County	4%	323	\$15,606	47	\$3,142	33	\$2,265	1	\$40	404	\$21,053	5%	
Parke County	3%	360	\$17,731	258	\$12,246	128	\$7,733	0	\$0	746	\$37,710	8%	
Perry & Spencer Counties	8%	539	\$29,085	267	\$15,383	109	\$3,877	5	\$3,341	920	\$51,686	10%	
Putnam County	8%	189	\$11,452	281	\$13,379	57	\$5,080	3	\$345	530	\$30,256	6%	

(\* ) Deposit data as of June 30, 2000.  
(\*\*) The evaluation period for Home Mortgage Loans, Small Loans to Businesses and Small Loans to Farms is April 1, 1998 to December 31, 2000.  
(\*\*\*) The evaluation period for Community Development Loans is April 15, 1998 to January 2, 2001.

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

Geographic Distribution: HOME PURCHASE															
State: Indiana															
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000															
MSA/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
Full-Scope:															
Bloomington MSA	742	33%	<1%	<1%	21%	24%	51%	35%	28%	41%	13.8 0	100	12.5 3	11.1 0	18.3 9
Daviess, Dubois, Knox, & Martin Counties	125	5%	NA	NA	12%	10%	71%	69%	17%	21%	NA	NA	NA	NA	NA
Terre Haute MSA	869	38%	<1%	<1%	23%	15%	52%	58%	25%	27%	12.1 1	80.0	8.16	12.6 0	13.7 3
Limited-Scope:															
Fountain & Warren Counties	36	2%	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA	NA	NA
Gibson County	135	6%	NA	NA	NA	NA	100%	100%	NA	NA	9.74	NA	NA	9.74	NA
Parke County	96	4%	NA	NA	NA	NA	100%	100%	NA	NA	23.8 9	NA	NA	23.8 9	NA
Perry & Spencer Counties	171	8%	NA	NA	NA	NA	73%	85%	27%	15%	25.3 0	NA	NA	31.0 1	12.5 0
Putnam County	85	4%	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA	NA	NA

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

(\*\*) Percentage of Owner-Occupied units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census Information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

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

Geographic Distribution: HOME IMPROVEMENT State: Indiana															
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000															
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share by Geography***				
	#	% of Total *	% Owner Occ Units*	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units*	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full-Scope:															
Bloomington MSA	50	4%	<1%	<1%	21%	12%	51%	64%	28%	24%	NA	NA	NA	NA	NA
Daviess, Dubois, Knox, & Martin Counties	208	16%	NA	NA	12%	21%	71%	66%	17%	13%	NA	NA	NA	NA	NA
Terre Haute MSA	595	45%	<1%	1%	23%	22%	52%	60%	25%	17%	20.8 7	100	17.9 5	23.4 2	18.2 5
Limited-Scope:															
Fountain & Warren Counties	43	3%	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA	NA	NA
Gibson County	68	5%	NA	NA	NA	NA	100%	100%	NA	NA	26.4 2	NA	NA	26.4 2	NA
Parke County	171	13%	NA	NA	NA	NA	100%	100%	NA	NA	52.6 3	NA	NA	52.6 3	NA
Perry & Spencer Counties	111	9%	NA	NA	NA	NA	73%	90%	27%	10%	40.6 3	NA	NA	45.8 0	17.2 4
Putnam County	64	5%	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA	NA	NA

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

(\*\* ) Percentage of Owner-Occupied units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census Information.

(\*\*\* ) Based on 1999 Aggregate HMDA Data only.

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

Geographic Distribution: HOME MORTGAGE REFINANCE State: Indiana															
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000															
MSA/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	Over all	Low	Mod	Mid	Upp
Full-Scope:															
Bloomington MSA	318	20%	<1%	<1%	21%	18%	51%	47%	28%	35%	6.90	0	10.06	4.73	9.55
Daviess, Dubois, Knox, & Martin Counties	132	8%	NA	NA	12%	10%	71%	65%	17%	25%	NA	NA	NA	NA	NA
Terre Haute MSA	589	37%	<1%	<1%	23%	14%	52%	67%	25%	19%	9.15	42.86	4.86	9.82	12.33
Limited-Scope:															
Fountain & Warren Counties	24	2%	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA	NA	NA
Gibson County	119	8%	NA	NA	NA	NA	100%	100%	NA	NA	7.28	NA	NA	7.28	NA
Parke County	93	6%	NA	NA	NA	NA	100%	100%	NA	NA	25.93	NA	NA	25.93	NA
Perry & Spencer Counties	257	16%	NA	NA	NA	NA	73%	91%	27%	9%	28.82	NA	NA	34.16	11.25
Putnam County	40	3%	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA	NA	NA

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

(\*\* ) Percentage of Owner-Occupied units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census Information.

(\*\*\* ) Based on 1999 Aggregate HMDA Data only.



**Table 5. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES												State: Indiana				
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000																
MSA/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 Busines sses **	% BANK Loans	% of Busines sses **	% BANK Loans	% of Busines sses **	% BANK Loans	% of Busines sses **	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full-Scope:																
Bloomington MSA	300	11%	4%	0%	43%	48%	29%	20%	24%	32%	8.22	0.00	10.9 0	4.06	9.90	
Daviess, Dubois, Knox, & Martin Counties	792	30%	NA	NA	15%	14%	64%	69%	21%	17%	20.1 5	NA	31.8 2	19.7 1	15.7 8	
Terre Haute MSA	434	16%	8%	5%	26%	24%	44%	46%	22%	25%	11.0 1	13.0 4	9.76	12.0 7	10.2 4	
Limited-Scope:																
Fountain & Warren Counties	306	11%	NA	NA	NA	NA	100%	100%	NA	NA	41.5 8	NA	NA	41.5 8	NA	
Gibson County	47	2%	NA	NA	NA	NA	100%	100%	NA	NA	4.44	NA	NA	4.44	NA	
Parke County	258	10%	NA	NA	NA	NA	100%	100%	NA	NA	37.7 4	NA	NA	37.7 4	NA	
Perry & Spencer Counties	267	10%	NA	NA	NA	NA	82%	89%	18%	11%	26.0 7	NA	NA	29.2 6	16.8 8	
Putnam County	281	10%	NA	NA	NA	NA	100%	100%	NA	NA	45.6 3	NA	NA	45.6 3	NA	

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

(\*\* ) Source of Data-Dunn and Bradstreet

(\*\*\*) Based on 1999 Aggregate Small Business Data only.

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

Geographic Distribution: SMALL LOANS TO FARMS											State: Indiana				
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000															
MSA/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	Over all	Low	Mod	Mid	Upp
Full-Scope:															
Bloomington MSA	6	1%	0%	0%	10%	17%	77%	83%	13%	0%	35.7 1	0.00	33.3 3	44.4 4	0.00
Daviess, Dubois, Knox, & Martin Counties	518	47%	NA	NA	10%	9%	75%	82%	15%	9%	35.9 3	NA	85.2 9	34.8 9	21.9 3
Terre Haute MSA	33	3%	1%	0%	4%	15%	58%	76%	37%	9%	11.0 4	0.00	55.5 6	13.9 2	1.52
Limited-Scope:															
Fountain & Warren Counties	210	19%	NA	NA	NA	NA	100%	100%	NA	NA	72.8 1	NA	NA	72.8 1	NA
Gibson County	33	3%	NA	NA	NA	NA	100%	100%	NA	NA	9.52	NA	NA	9.52	NA
Parke County	128	12%	NA	NA	NA	NA	100%	100%	NA	NA	44.6 0	NA	NA	44.6 0	NA
Perry & Spencer Counties	109	10%	NA	NA	NA	NA	79%	83%	21%	17%	25.5 2	NA	NA	29.8 1	12.5 0
Putnam County	57	5%	NA	NA	NA	NA	100%	100%	NA	NA	54.4 3	NA	NA	54.4 3	NA

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

(\*\*) Source of Data-Dunn and Bradstreet  
 (\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE State: Indiana															
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000															
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share by Geography****				
	#	% of Total*	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	Over all	Low	Mod	Mid	Upp
Full-Scope:															
Bloomington MSA	742	33%	20%	4%	17%	15%	24%	26%	39%	54%	13.80	8.81	10.80	13.42	21.02
Daviess, Dubois, Knox, & Martin Counties	125	5%	19%	4%	19%	22%	25%	34%	37%	37%	NA	NA	NA	NA	NA
Terre Haute MSA	869	38%	19%	7%	19%	17%	23%	23%	39%	50%	12.11	9.33	9.74	12.76	21.23
Limited-Scope:															
Fountain & Warren Counties	36	2%	17%	11%	22%	36%	27%	17%	34%	36%	NA	NA	NA	NA	NA
Gibson County	135	6%	16%	12%	18%	27%	25%	32%	41%	29%	9.74	12.24	15.53	7.52	9.90
Parke County	96	4%	19%	9%	21%	16%	27%	33%	33%	42%	23.89	18.18	16.67	29.41	36.36
Perry & Spencer Counties	171	8%	17%	11%	19%	26%	26%	26%	38%	35%	25.30	18.92	24.07	24.14	34.71

Putnam County	85	4%	14%	6%	20%	26%	26%	33%	40%	34%	NA	NA	NA	NA	NA
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(\*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated/purchased in the rated area.

(\*\*) Percentage of Families is based on 1990 Census Information.

(\*\*\*) As a percentage of loans with borrower income information available.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

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

Borrower Distribution: HOME IMPROVEMENT State: Indiana															
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000															
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share by Geography****				
	#	% of Total*	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	Over all	Low	Mod	Mid	Upp
Full-Scope:															
Bloomington MSA	50	4%	20%	20%	17%	26%	24%	20%	39%	32%	NA	NA	NA	NA	NA
Daviess, Dubois, Knox, & Martin Counties	208	16%	19%	12%	19%	26%	25%	35%	37%	25%	NA	NA	NA	NA	NA
Terre Haute MSA	595	45%	19%	9%	19%	21%	23%	31%	39%	37%	20.87	13.29	16.76	25.26	22.39
Limited-Scope:															
Fountain & Warren Counties	43	3%	17%	7%	22%	23%	27%	28%	34%	42%	NA	NA	NA	NA	NA
Gibson County	68	5%	16%	25%	18%	13%	25%	37%	41%	24%	26.42	28.57	17.86	29.03	26.67
Parke County	171	13%	19%	16%	21%	21%	27%	27%	33%	36%	52.63	47.06	51.85	51.22	56.25

Perry & Spencer Counties	111	9%	17%	14%	19%	22%	26%	27%	38%	36%	40.63	81.82	25.71	43.14	41.38
Putnam County	64	5%	14%	9%	20%	14%	26%	30%	40%	47%	NA	NA	NA	NA	NA

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

(\*\*) Percentage of Families is based on 1990 Census Information.

(\*\*\*) As a percentage of loans with borrower income information available.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE State: Indiana															
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000															
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share by Geography****				
	#	% of Total*	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	Over all	Low	Mod	Mid	Upp
Full-Scope:															
Bloomington MSA	318	20%	20%	6%	17%	17%	24%	25%	39%	50%	16.90	3.11	6.80	8.19	10.06
Daviess, Dubois, Knox, & Martin Counties	132	8%	19%	4%	19%	18%	25%	33%	37%	42%	NA	NA	NA	NA	NA
Terre Haute MSA	589	37%	19%	5%	19%	14%	23%	26%	39%	51%	9.15	4.85	5.19	10.25	14.59
Limited-Scope:															
Fountain & Warren Counties	24	2%	17%	0%	22%	21%	27%	17%	34%	62%	NA	NA	NA	NA	NA

Gibson County	119	8%	16%	8%	18%	13%	25%	37%	41%	39%	7.28	5.26	2.68	10.00	12.12
Parke County	93	6%	19%	4%	21%	18%	27%	40%	33%	34%	25.93	16.67	17.02	38.33	31.88
Perry & Spencer Counties	257	16%	17%	10%	19%	20%	26%	34%	38%	33%	28.82	30.19	27.34	32.04	35.64
Putnam County	40	3%	14%	15%	20%	8%	26%	22%	40%	55%	NA	NA	NA	NA	NA

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

(\*\*) Percentage of Families is based on 1990 Census Information.

(\*\*\*) As a percentage of loans with borrower income information available.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 10. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		State: Indiana							
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000									
MSA/Assessment Area:	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses*	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Scope:									
Bloomington MSA	300	11%	88%	74%	60%	23%	17%	8.22	8.46
Daviess, Dubois, Knox, & Martin Counties	792	30%	87%	84%	84%	10%	6%	20.15	24.57
Terre Haute MSA	434	16%	87%	90%	78%	13%	9%	11.01	12.78
Limited-Scope:									

Fountain & Warren Counties	306	11%	90%	99%	92%	7%	1%	41.58	54.55
Gibson County	47	2%	91%	91%	92%	2%	6%	4.44	5.36
Parke County	258	10%	90%	96%	90%	7%	3%	37.74	43.44
Perry & Spencer Counties	267	10%	88%	93%	86%	10%	4%	26.07	35.02
Putnam County	281	10%	91%	94%	90%	7%	3%	45.63	54.36

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

(\*\*) Businesses with revenues of \$1 million or less as a percentage of all businesses.

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

(\*\*\*\*) Based on 1999 Aggregate Small Business Data only.

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

Borrower Distribution: SMALL LOANS TO FARMS		Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000						State: Indiana	
MSA/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
Full-Scope:									
Bloomington MSA	6	1%	99%	100%	67%	33%	0%	35.71	38.46
Daviess, Dubois, Knox, & Martin Counties	518	47%	98%	94%	86%	11%	3%	35.93	35.61
Terre Haute MSA	33	3%	99%	94%	73%	21%	6%	11.04	10.53
Limited-Scope:									
Fountain & Warren Counties	210	19%	99%	97%	85%	13%	2%	72.81	72.97
Gibson County	33	3%	100%	97%	82%	12%	6%	9.52	8.47
Parke County	128	12%	100%	100%	81%	13%	6%	44.60	44.93
Perry & Spencer Counties	109	10%	100%	99%	94%	6%	0%	25.52	25.87
Putnam County	57	5%	100%	89%	74%	17%	9%	54.43	51.39

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

(\*\*) Farms with revenues of \$1 million or less as a percentage of all farms.

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

(\*\*\*\*) Based on 1999 Aggregate Small Farm Data only.



**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		State: Indiana							
Evaluation Period: APRIL 15, 1998 TO JANUARY 2, 2001									
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Scope:									
Bloomington MSA	1	\$17	24	\$17	25	\$34	1%	0	0
Daviess, Dubois, Knox, & Martin Counties	1	\$61	24	\$29	25	\$90	2%	0	0
Terre Haute MSA	2	\$244	3	\$2,368	5	\$2,612	61%	0	0
Limited-Scope:									
Fountain & Warren Counties	1	\$12	2	\$1	3	\$13	<1%	0	0
Gibson County	1	\$6	2	\$20	3	\$26	1%	0	0
Parke County	1	\$5	2	\$3	3	\$8	<1%	0	0
Perry & Spencer Counties	2	\$1,482	2	\$2	4	\$1,484	35%	0	0
Putnam County	1	\$14	6	\$8	7	\$22	<1%	0	0

(\*) "Prior Period Investments" means investments made in a previous evaluation period that are outstanding as of the examination date.

(\*\*) "Unfunded Commitments" means legally binding investment commitments that are tracked and reported by the bank's financial reporting system.

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														State: Indiana			
Evaluation Period: APRIL 15, 1998 TO JANUARY 2, 2001																	
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA *	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
Bloomington MSA	10%	5	9%	0%	40%	40%	20%	0	1	0	+1	0	0	14%	28%	34%	24%
Daviess, Dubois, Knox, & Martin Counties	37%	19	37%	NA	16%	58%	26%	1	0	NA	0	0	-1	NA	14%	70%	16%
Terre Haute MSA	23%	10	19%	10%	30%	40%	20%	4	0	0	-1	-3	0	<1%	26%	47%	27%
Limited-Scope:																	
Fountain & Warren Counties	7%	5	9%	NA	NA	100%	NA	0	0	NA	NA	NA	NA	NA	NA	100%	NA
Gibson County	4%	3	6%	NA	NA	100%	NA	0	0	NA	NA	NA	NA	NA	NA	100%	NA
Parke County	3%	3	6%	NA	NA	100%	NA	0	0	NA	NA	NA	NA	NA	NA	100%	NA
Perry & Spencer Counties	8%	5	9%	NA	NA	100%	0%	0	0	NA	NA	NA	NA	NA	NA	73%	27%
Putnam County	8%	2	4%	NA	NA	100%	NA	1	0	NA	NA	-1	NA	NA	NA	100%	NA

(\*) The % of rated area branches in MSA/AA equals 99% due to rounding.

**Table 1. Lending Volume**

LENDING VOLUME												State: Kentucky	
MSA/Assessment Area:	% of Rated Area Deposits in MSA/AA *	Home Mortgage**		Small Loans to Businesses**		Small Loans to Farms**		Community Development***		Total Reported Loans		% of Rated Area Loans (#) in MSA/AA	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
Full-Scope:													
Hopkins & Muhlenberg Counties	65%	554	\$20,641	669	\$47,883	133	\$6,495	0	\$0	1,356	\$75,019	59%	
Limited-Scope:													
Fulton & Hickman Counties	19%	75	\$1,942	81	\$2,044	51	\$2,253	2	\$99	209	\$6,338	9%	
Owensboro MSA	<1%	131	\$10,673	75	\$9,086	8	\$1,204	0	\$0	214	\$20,963	9%	
Union County	16%	134	\$3,933	212	\$10,089	183	\$10,480	1	\$6	530	\$24,508	23%	

(\* ) Deposit data as of June 30, 2000.

(\*\* ) The evaluation period for Home Mortgage Loans, Small Loans to Businesses and Small Loans to Farms is April 1, 1998 to December 31, 2000.

(\*\*\* ) The evaluation period for Community Development Loans is April 15, 1998 to January 2, 2001.

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

Geographic Distribution: HOME PURCHASE															
State: Kentucky		Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000													
MSA/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
Full-Scope:															
Hopkins & Muhlenberg Counties	238	61%	NA	NA	1%	1%	65%	62%	34%	37%	NA	NA	NA	NA	NA
Limited-Scope:															
Fulton & Hickman Counties	20	5%	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA	NA	NA
Owensboro MSA	100	26%	4%	5%	8%	13%	65%	61%	23%	21%	NA	NA	NA	NA	NA
Union County	31	8%	NA	NA	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA

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

(\*\*) Percentage of Owner-Occupied units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census Information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

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

Geographic Distribution: HOME IMPROVEMENT															
Kentucky												State:			
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000															
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share by Geography***				
	#	% of Total *	% Owner Occ Units*	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units*	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full-Scope:															
Hopkins & Muhlenberg Counties	220	67%	NA	NA	1%	2%	65%	71%	34%	27%	NA	NA	NA	NA	NA
Limited-Scope:															
Fulton & Hickman Counties	39	12%	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA	NA	NA
Owensboro MSA	7	2%	4%	0%	8%	0%	65%	57%	23%	43%	NA	NA	NA	NA	NA
Union County	64	19%	NA	NA	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA

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

(\*\*) Percentage of Owner-Occupied units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census Information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

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

Geographic Distribution: HOME MORTGAGE REFINANCE State: Kentucky Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000															
MSA/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	Over all	Low	Mod	Mid	Upp
Full-Scope:															
Hopkins & Muhlenberg Counties	92	54%	NA	NA	1%	0%	65%	61%	34%	39%	NA	NA	NA	NA	NA
Limited-Scope:															
Fulton & Hickman Counties	15	9%	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA	NA	NA
Owensboro MSA	24	14%	4%	8%	8%	0%	65%	54%	23%	38%	NA	NA	NA	NA	NA
Union County	39	23%	NA	NA	NA	NA	NA	NA	100%	100%	NA	NA	NA	NA	NA

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

(\*\* ) Percentage of Owner-Occupied units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census Information.

(\*\*\* ) Based on 1999 Aggregate HMDA Data only.

**Table 5. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES												State: Kentucky				
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000																
MSA/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 Busines sses **	% BANK Loans	% of Busines sses **	% BANK Loans	% of Busines sses **	% BANK Loans	% of Busines sses **	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full-Scope:																
Hopkins & Muhlenberg Counties	669	65%	NA	NA	2%	2%	63%	59%	35%	39%	44.97	NA	50.00	46.40	43.26	
Limited-Scope:																
Fulton & Hickman Counties	81	8%	NA	NA	NA	NA	100%	100%	NA	NA	21.71	NA	NA	21.71	NA	
Owensboro MSA	75	7%	14%	16%	17%	5%	49%	51%	20%	28%	1.77	1.94	0.00	1.75	2.78	
Union County	212	20%	NA	NA	NA	NA	NA	NA	100%	100%	19.05	NA	NA	NA	19.05	

(\* ) Small loans to businesses originated and purchased in the MSA/AA as a percentage of small loans to businesses originated/purchased in the rated area.  
 (\*\* ) Source of Data-Dunn and Bradstreet  
 (\*\*\*) Based on 1999 Aggregate Small Business Data only.

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

Geographic Distribution: SMALL LOANS TO FARMS												State: Kentucky				
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000																
MSA/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	Over all	Low	Mod	Mid	Upp	
Full-Scope:																
Hopkins & Muhlenberg Counties	133	35%	NA	NA	0%	0%	51%	72%	49%	28%	70.0 0	NA	0.00	87.5 0	41.1 8	
Limited-Scope:																
Fulton & Hickman Counties	51	14%	NA	NA	NA	NA	100%	100%	NA	NA	53.8 5	NA	NA	53.8 5	NA	
Owensboro MSA	8	2%	<1%	0%	1%	0%	86%	50%	13%	50%	5.26	0.00	0.00	2.27	28.5 7	
Union County	183	49%	NA	NA	NA	NA	NA	NA	100%	100%	46.5 8	NA	NA	NA	46.5 8	

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

(\*\*) Source of Data-Dunn and Bradstreet

(\*\*\*) Based on 1999 Aggregate Small Farm Data only.



**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE State: Kentucky															
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000															
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share by Geography****				
	#	% of Total*	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	Over all	Low	Mod	Mid	Upp
Full-Scope:															
Hopkins & Muhlenberg Counties	238	61%	19%	7%	16%	16%	18%	21%	47%	56%	NA	NA	NA	NA	NA
Limited-Scope:															
Fulton & Hickman Counties	20	5%	26%	0%	15%	15%	17%	25%	42%	60%	NA	NA	NA	NA	NA
Owensboro MSA	100	26%	21%	14%	18%	26%	23%	26%	38%	32%	NA	NA	NA	NA	NA
Union County	31	8%	15%	6%	13%	23%	18%	19%	54%	52%	NA	NA	NA	NA	NA

(\*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated/purchased in the rated area.  
 (\*\*) Percentage of Families is based on 1990 Census Information.  
 (\*\*\*) As a percentage of loans with borrower income information available.  
 (\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

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

Borrower Distribution: HOME IMPROVEMENT State: Kentucky															
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000															
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share by Geography****				
	#	% of Total*	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	Over all	Low	Mod	Mid	Upp
Full-Scope:															
Hopkins & Muhlenberg Counties	220	67%	19%	12%	16%	16%	18%	31%	47%	41%	NA	NA	NA	NA	NA
Limited-Scope:															
Fulton & Hickman Counties	39	12%	26%	15%	15%	21%	17%	15%	42%	49%	NA	NA	NA	NA	NA
Owensboro MSA	7	2%	21%	0%	18%	0%	23%	57%	38%	43%	NA	NA	NA	NA	NA
Union County	64	19%	15%	17%	13%	8%	18%	25%	54%	50%	NA	NA	NA	NA	NA

(\*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated/purchased in the rated area.  
 (\*\*) Percentage of Families is based on 1990 Census Information.  
 (\*\*\*) As a percentage of loans with borrower income information available.  
 (\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE State: Kentucky															
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000															
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share by Geography****				
	#	% of Total*	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	Over all	Low	Mod	Mid	Upp
Full-Scope:															
Hopkins & Muhlenberg Counties	92	54%	19%	6%	16%	13%	18%	27%	47%	53%	NA	NA	NA	NA	NA
Limited-Scope:															
Fulton & Hickman Counties	15	9%	26%	7%	15%	7%	17%	13%	42%	73%	NA	NA	NA	NA	NA
Owensboro MSA	24	14%	21%	8%	18%	8%	23%	21%	38%	62%	NA	NA	NA	NA	NA
Union County	39	23%	15%	0%	13%	21%	18%	23%	54%	51%	NA	NA	NA	NA	NA

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

(\*\* ) Percentage of Families is based on 1990 Census Information.

(\*\*\* ) As a percentage of loans with borrower income information available.

(\*\*\*\* ) Based on 1999 Aggregate HMDA Data only.

**Table 10. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		State: Kentucky							
Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000									
MSA/Assessment Area:	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses*	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Scope:									
Hopkins & Muhlenberg Counties	669	65%	88%	90%	83%	11%	6%	44.97	51.90
Limited-Scope:									
Fulton & Hickman Counties	81	8%	87%	100%	98%	2%	0%	21.71	38.36
Owensboro MSA	75	7%	87%	81%	68%	24%	8%	1.77	1.87
Union County	212	20%	87%	94%	86%	10%	4%	19.05	26.38

(\* ) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated/purchased in the rated area.  
(\*\*) Businesses with revenues of \$1 million or less as a percentage of all businesses.  
(\*\*\*) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.  
(\*\*\*\*) Based on 1999 Aggregate Small Business Data only.

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

Borrower Distribution: SMALL LOANS TO FARMS Kentucky		Evaluation Period: APRIL 1, 1998 TO DECEMBER 31, 2000						State:	
MSA/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
Full-Scope:									
Hopkins & Muhlenberg Counties	133	35%	98%	96%	90%	8%	2%	70.00	70.10
Limited-Scope:									
Fulton & Hickman Counties	51	14%	97%	100%	94%	4%	2%	53.85	53.85
Owensboro MSA	8	2%	99%	87%	63%	0%	37%	5.26	4.95
Union County	183	49%	99%	94%	90%	5%	5%	46.58	45.64

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

(\*\*) Farms with revenues of \$1 million or less as a percentage of all farms.

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

(\*\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		State: Kentucky							
Evaluation Period: APRIL 15, 1998 TO JANUARY 2, 2001									
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Scope:									
Hopkins & Muhlenberg Counties	1	\$30	21	\$51	22	\$81	79%	0	0
Limited-Scope:									
Fulton & Hickman Counties	1	\$9	4	\$1	5	\$10	10%	0	0
Owensboro MSA	0	0	0	0	0	0	0%	0	0
Union County	1	\$7	2	\$4	3	\$11	11%	0	0

(\*) "Prior Period Investments" means investments made in a previous evaluation period that are outstanding as of the examination date.

(\*\*) "Unfunded Commitments" means legally binding investment commitments that are tracked and reported by the bank's financial reporting system.

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										State: Kentucky							
Evaluation Period: APRIL 15, 1998 TO JANUARY 2, 2001																	
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA *	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
Hopkins & Muhlenberg Counties	65%	8	53%	NA	0%	63%	37%	1	0	NA	0	-1	0	NA	1%	65%	34%
Limited-Scope:																	
Fulton & Hickman Counties	19%	2	13%	NA	NA	100%	NA	0	0	NA	NA	NA	NA	NA	NA	100%	NA
Owensboro MSA	<1%	3	20%	0%	0%	100%	0%	0	3	0	0	+3	0	6%	9%	64%	21%
Union County	16%	2	13%	NA	NA	NA	100%	2	0	NA	NA	NA	-2	NA	NA	NA	100%

(\*) The % of rated area branches in MSA/AA equals 99% due to rounding.