



# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## PUBLIC DISCLOSURE

May 31, 2010

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Financial National Bank  
Charter Number: 56

300 High Street  
Hamilton, Ohio 45011

Office of the Comptroller of the Currency

Central Ohio Field Office  
4555 Lake Forest Drive, Suite 610  
Cincinnati, Ohio 45242-3760

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

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## Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated “Satisfactory”.

The following table indicates the performance level of **First Financial Bank, National Association (“FFB”)** with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

- FFB’s lending performance is adequate. The bank has a generally strong record of lending to the low- and moderate-income segments in the State of Ohio and its primary market in the Cincinnati-Middletown Multistate MSA and an adequate record of lending in the State of Indiana.
- The bank’s overall level of qualified investments is adequate. FFB had a low level of investments within its AAs in the current evaluation period; however, prior period investments that had a continuing impact on their communities were considered and positively impacted the overall Investment Test Rating. FFB has a generally strong record of investments in the State of Indiana, augmented by a significant level of state-wide investments outside of the bank’s AAs; however, the bank needs to improve its level of investments in areas of the State of Ohio that are outside of the Cincinnati-Middletown Multistate MSA.
- The bank’s performance under the Service Test is good overall. The accessibility of the bank’s branches to residents in low-and moderate-income geographies is the main factor contributing to the overall Service Test rating. The distribution of FFB’s branches within its primary market in the Cincinnati-Middletown Multistate MSA is excellent as branches are readily accessible to all geographies located there.
- FFB’s distribution of branches in the states of Indiana and Ohio is adequate overall. Poor accessibility of branches to low- and moderate-income geographies in the Dayton, OH AA, Lake County, IN AA, and Lafayette, IN AA negatively impacted the Service Test ratings in Ohio and Indiana.
- Overall, community development services provided by the bank are adequate. In the Cincinnati-Middletown Multistate MSA, the bank provided a good level of services as bank officers provide financial expertise to several organizations that provide community development services. The bank’s performance in other rating areas was adequate.

## Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Description of Institution

### Description of the Institution

First Financial Bank, National Association (FFB) is a \$6.7 billion interstate bank headquartered in Hamilton, Ohio, approximately 25 miles northwest of Cincinnati, Ohio. The bank operates in 10 distinct markets and has 14 assessment areas (AAs) in Ohio, Kentucky, Indiana, and Michigan. Since the last CRA examination in November 2005, FFB has grown significantly from \$1.98 billion in assets to its current \$6.7 billion as of December 31, 2009. The growth is primarily the result of consolidating banking charters across its holding company and several acquisitions during the review period. Most recently in 2009, FFB purchased the following institutions: Peoples Community Bank (Cincinnati Market); three banking centers in Central Indiana from Irwin Union Bank & Trust; and 27 banking centers from Irwin Union Bank & Trust and Irwin Union Bank FSB in FDIC-assisted transactions. Including the merged institutions, near the end of the evaluation period FFB operated 116 branches and over 120 ATMs.

FFB is a subsidiary of First Financial Bancorp (FFBC), a \$6.7 billion holding company headquartered in Cincinnati, Ohio. FFBC operates two subsidiaries, FFB and a wealth management company that provides trust services, brokerage, investment and other related services. In addition, FFB owns a specialty franchise lending company as part of a business acquisition in 2009. The franchise provides equipment and leasehold improvement financing for franchisees in the quick service and casual dining restaurant sector.

FFB offers a full range of banking products and services. The bank's primary focus is commercial real estate lending and residential real estate lending. Additionally, FFB offers commercial and industrial lending, as well as consumer lending. In addition, FFB owns a specialty franchise lending company as part of a business acquisition in 2009. The franchise provides equipment and leasehold improvement financing for franchisees in the quick service and casual dining restaurant sector.

As of December 31, 2009, net loans and leases represented 71.5 percent of total assets. The \$4.8 billion loan portfolio consisted of commercial real estate (51.2 percent), residential real estate (24.6 percent), commercial and industrial loans (18.6 percent), loans to individuals (2.4 percent), agricultural loans (2.2 percent), and other loans (1.0 percent). As of December 31, 2009, FFB had \$566 million in Tier One capital which included \$80 million from the Troubled Assets Relief Program (TARP), \$100 million from a June 2009 share issuance, as well as a \$241 million after-tax profit from the FDIC-assisted Irwin purchase that was realized near the end of the evaluation period. From December 2005 through December 2008, Tier One Capital ranged from \$298 million to \$311 million.

In September 2009, as part of the Irwin Union acquisition, FFB acquired banking centers in nine states: Indiana, Kentucky, Nevada, Missouri, New Mexico, California, Utah, Michigan, and Arizona. The areas served by these banking centers were not included as part of this evaluation due to the short period between their acquisition and the beginning of this evaluation.

No legal, financial, or other factors impede the bank's ability to help meet the credit needs of its assessment areas during the evaluation period. The bank received a "Satisfactory" rating at the last CRA examination dated November 7, 2005.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We analyzed home purchase, home improvement, and home refinance mortgage loans the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans made to businesses the bank reported under the Community Reinvestment Act. The evaluation period for home mortgage loans and small loans to businesses was January 1, 2005 through December 31, 2009. We analyzed community development loans, qualified investments and community development services from November 7, 2005 (the date of the last evaluation), through May 31, 2010. While the bank makes some agricultural and multi-family property loans, in most assessment areas these loan types represent a very small percentage of the bank's lending activity and had volumes too small for meaningful analyses. However, information regarding the number and volume of these loans is presented in the corresponding tables found in Appendix D for each rating area. In September 2009, as part of the Irwin Union acquisition, FFB acquired banking centers in nine states: Indiana, Kentucky, Nevada, Missouri, New Mexico, California, Utah, Michigan, and Arizona. As previously mentioned, the areas served by these banking centers were not included as part of this evaluation due to the short period between their acquisition and the beginning of this evaluation. Similarly, the one branch opened in Kenton County, Kentucky, in late December 2009, was not included as part of this evaluation.

### Data Integrity

As part of our ongoing supervision of the bank, we tested the accuracy of the bank's HMDA and CRA lending data. We also reviewed the appropriateness of community development activities provided for consideration in our evaluation. This included testing of community development loans, investments, and services for accuracy and to determine if they qualify as community development. We determined that the data reported publicly and the additional data provided for this evaluation are reliable.

### Selection of Areas for Full-Scope Review

We selected one assessment area (AA) in each state where the bank has an office for a full-scope review. In addition, the bank's performance within the Cincinnati-Middletown Multistate Metropolitan Area was reviewed using full-scope procedures. Full-scope reviews consider performance context, quantitative and qualitative factors. The AAs selected for the full-scope review have the largest percentage of FFB's deposits in that state. The other AAs in each state were analyzed using limited-scope procedures. Limited-scope procedures consider quantitative factors only. Both the states of Ohio and Indiana had non-urban communities in which FFB has an office. In each state, these non-urban communities were aggregated as one for analytical purposes and are referred to as the "Indiana Non-MSA AA" and "Ohio Non-MSA AA". Refer to the "Description of the Institution's Operations" section under each State Rating for details regarding how the areas were selected.

### Ratings

The bank's overall rating is a blend of the multistate metropolitan area ratings and state ratings. The Cincinnati-Middletown Multi-State Metropolitan Area carried the greatest weight in our conclusions because it represents the bank's most significant market in terms of deposit concentration, as well as lending, investment, and service activity. Areas in order of significance, these areas are the Cincinnati-Middletown Multistate Metropolitan Area (49.5 percent of deposits), the State of Indiana (30.0 percent) and the State of Ohio (20.5 percent).

The state ratings are based primarily on those areas that received full-scope reviews, but proportional consideration is given to the bank's performance in areas receiving limited-scope reviews. Refer to the

“Conclusions for Areas Receiving Limited-Scope Reviews” section under each test in each state rating for details regarding how the areas were weighted in arriving at the overall state rating.

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

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

## **Other Information**

### ***Community Contacts***

We reviewed information from contacts made during the evaluation period with a variety of groups and organizations to identify financial and credit needs and opportunities within FFB’s assessment areas. We made two contacts specifically for this evaluation in each full-scope area. Interviews were conducted with low-income housing specialists, community and economic development organizations, and community action groups. Relevant comments were included as appropriate in our performance context considerations. Information from community contacts for the Primary Rating Areas is summarized in the Community Profiles found in Appendix C.

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

We reviewed summary reports and analyzed FFB’s home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We determined that all of the bank’s AAs consist of whole geographies, meet the requirements of the Community Reinvestment Act regulation, and do not arbitrarily exclude any low- or moderate-income areas. We considered the low level of penetration of home mortgage and small business loans in low- and moderate-income areas within the Lake County AA. In doing so, we considered the strong competition among financial institutions in the area and the number of loan applications taken by FFB and the high poverty and unemployment rates in the AA. We also considered the length of time since FFB had merged the former Sand Ridge Bank into FFB in 2005 and incorporated the entirety of Lake County, Indiana, into its assessment area and the ability of the bank’s branches located there to adequately serve the entire assessment area. We noted that none of FFB’s eight branches in the Lake County AA are located in low- and moderate-income geographies. However, branches adjacent, or near to low- and moderate-income geographies create lending opportunities when considering the number of owner-occupied units, particularly in moderate-income geographies. We also considered the effect of the bank’s investments in the AA, particularly those that serve the need for affordable housing; however, we noted that the majority of these investments were made in the prior evaluation period. The length of time the bank had designated Lake County in its assessment area, the lending opportunities available in the AA, as well as the bank’s record of taking loan applications, were the most significant factors in evaluating performance in the Lake County AA.

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

A majority of originated and purchased loans reported by FFB during the evaluation period are within the bank’s AAs. A substantial majority of home mortgage and small business/farm loans was done within the AAs. Eighty-five percent of the number of home mortgage loans (83 percent home purchase, 88 percent home improvement, 87 percent refinances) and 82 percent of loan dollars (81 percent home purchase, 86 percent home improvement, 82 percent refinances) are located within the bank’s AAs. Eighty-six percent of the number of small business loans and 82 percent of loan dollars are located in the bank’s AAs. Eighty-two percent of the number of small farm loans and 82 percent of loan dollars

are located within the bank's AAs. The majority of all community development loans were done within the AAs. These calculations are done on a bank-wide basis. This record of lending within the AAs did not significantly impact geographic distribution conclusions.

### ***Flexible and Innovative Loan Programs***

FFB offers "CHAMP" affordable housing loans which provide aggressive loan-to-value ratios without the necessity for mortgage insurance, underwriting flexibilities, the allowance of non-traditional credit history, and the use of gifts to assist with down payment and/or closing costs. Examples of these loans are discussed throughout the narrative portions of the lending tests. While this program demonstrates FFB's commitment to providing flexible and innovative products, the volume of loans generated by the program is not substantial enough to impact any particular rating area.

### ***Factors Considered in our Analysis Under the Performance Tests***

Lending Test - We considered the bank's home mortgage and small business/farm lending in determining lending performance where sufficient data was available to conduct a meaningful analysis. Geographic and borrower distribution analyses were generally given equal weight, with community development activity given significant consideration in rating areas where the bank made an exceptional volume of these loans in terms of dollars. We also considered community development loans in the regional area that did not have the potential to benefit the AAs. Refer to Table 1 on page D-47. These loans did not impact our overall lending test conclusions.

Investment Test – We generally gave equal consideration to the volume of investments and grants made in the current evaluation period and the qualified investments that had outstanding balances on the bank's books from the prior evaluation period. Additional, but lesser consideration was given to investments made by the bank in state-wide funds within the state or broader regional area that includes the bank's AAs but not located within the bank's AAs, provided that the bank had an adequate level of investments in its AAs.

We evaluated the responsiveness of those investments to the community's identified needs. We also compared the dollar volume of qualified investments in each AA to the dollar volume of Tier I capital allocated to that AA to gauge the level of qualified investments on an AA, state-wide and bank basis.

Service Test - We gave primary consideration to FFB's performance in ensuring that low- and moderate-income people and areas had reasonable access to the bank's branches and ATMs. We evaluated the impact of branch openings and closings on accessibility for low- and moderate-income people and areas. We also considered the range of products and services and the convenience of business hours in low- and moderate-income areas compared to those in middle- and upper-income areas to determine if there were differences. We also evaluated the impact of community development services provided by the bank.

## Multistate Metropolitan Area Rating

### Cincinnati– Middletown, OH-KY-IN Multistate Metropolitan Area (#17140)

CRA rating for the Cincinnati– Middletown, OH-KY-IN, Multistate Metropolitan Area<sup>1</sup>: **Satisfactory**

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

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

The service test is rated: **Outstanding**

The major factors that support this rating include:

- The geographic distribution of FFB’s home mortgage and small business lending is excellent.
- The borrower distribution of FFB’s home mortgage and small business lending is good.
- Community development lending activity is adequate but did not impact the overall Lending Test rating for the Cincinnati-Middletown AA.
- The bank had an adequate volume of community development investments that especially addressed the need for affordable housing.
- The bank’s overall distribution of branches and ATMs in the Cincinnati-Middletown AA is excellent.
- The bank provided a good level of community development services in the Cincinnati Multistate AA.

### Description of Institution’s Operations in Cincinnati - Middletown, OH-KY-IN Multistate Metropolitan Area

FFB operates 46 branches and 59 deposit-taking ATMs in the Cincinnati-Middletown AA. The AA includes portions of Ohio, Kentucky, and Indiana. These branches represent 46 percent of the bank’s total branch network included in this evaluation. Of the 46 branches, four are located in Indiana, three are located in Kentucky, and the remaining 39 are located in Ohio. One branch in Ohio is located in an unknown income tract. The bank’s assessment area includes a portion of the Cincinnati-Middletown, OH-KY-IN MSA #17140 and is comprised of two entire counties in Ohio, one entire county in Kentucky, and three entire counties in Indiana. All counties closely surround the City of Cincinnati. Refer to Appendix A for a listing of areas that comprise the Cincinnati-Middletown AA.

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

## **Scope of Evaluation in Cincinnati-Middletown, OH-KY-IN Multistate Metropolitan Area**

The Cincinnati-Middletown AA received a full-scope review. Deposits in the Cincinnati-Middletown AA represent 49.5 percent of the bank's total deposits. As such, performance in this rating area had a significant impact on the bank's overall CRA rating.

In conjunction with this evaluation, we interviewed two community organizations that serve the Hamilton County and Butler County areas. One organization is a private non-profit lending business that provides loans for home purchase, home rehabilitation and down payment/closing cost assistance to low- and middle- income individuals. The other is a faith-based organization providing services to low-income and homeless individuals. Based on information from these contacts, there are ample opportunities for banks to participate in community development or financing programs in Hamilton and Warren Counties, including financing for housing projects. Also, there are opportunities to support some microenterprises and participate in micro-lending as well as financial literacy, credit, and budgeting counseling. Many individuals rely on check-cashing services and are unaware or uninformed of available banking services.

Refer to the market profiles for the Cincinnati Multistate Metropolitan Area in appendix C for detailed demographics and other performance context information for this AA that received a full-scope review.

## **LENDING TEST**

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

The bank's performance under the Lending Test in the Cincinnati-Middletown AA is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Cincinnati-Middletown AA is good based on excellent geographic distribution of loans and good borrower distribution of loans.

### **Lending Activity**

Refer to Table 1 Lending Volume in the Cincinnati-Middletown AA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

FFB's lending activity in the Cincinnati-Middletown AA is adequate, especially considering the strong level of competition in the market. In the AA, FFB ranks seventh in deposits among 82 depository institutions and has a 2.69 percent share of the market according to June 30, 2009 FDIC deposit data. But, with over 400 mortgage lenders operating in the AA, the majority of which are not depository institutions, and almost 100 small business lenders, FFB's lending market shares are lower than its deposit share.

FFB's primary lending products in the Cincinnati-Middletown AA are small loans to businesses, and home refinance loans. However, home purchase loans also made up a significant portion of the bank's mortgage loans. According to 2008 aggregate CRA data, FFB ranked 13th in volume of originated/purchased small business loans with a market share of 1.54%. According to 2008 aggregate HMDA data, the bank ranks low in market share for all mortgage loan products at less than one percent of market share. Given that FFB's volume of multi-family and small farm loans was so low, no analysis of these products was performed.

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

The geographic distribution of FFB's loans in the Cincinnati-Middletown AA is excellent. This is based on an excellent geographic distribution record of home purchase, home improvement, and refinances and a good distribution record of small business loans.

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

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

In evaluating the geographic distribution of home mortgage loans, we considered that the number of owner-occupied housing units located in the low-income neighborhoods of the Cincinnati-Middletown AA is very small. Less than three percent of the housing units are located in those segments of the community. This has an impact on the opportunity to lend in the low-income neighborhoods.

The geographic distribution of home purchase, home improvement, and home refinance loans is excellent based primarily on the bank's performance in the moderate-income geographies in the AA. FFB's percentage of home purchase, home improvement and home refinance loans in moderate-income geographies exceeds the percentage of owner-occupied units in that segment of the AA. The percentages of FFB's loans in low-income geographies are below the percentages of owner-occupied housing units located in those areas. FFB's 2008 home mortgage loan market shares were too small for meaningful analysis.

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

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

The geographic distribution of small loans to businesses is good, based primarily on performance in the moderate-income neighborhoods. The percentage of FFB's loans in moderate-income geographies exceeds the percentages of businesses located in those segments of the AA. The percentage of lending in low-income areas is lower than the percentage of businesses located there. While performance is considered poor in the low-income areas, consideration is given to the fact that the number of businesses located in low-income neighborhoods is limited. Less than six percent of the AA's businesses are located in low-income areas, impacting the bank's opportunity to lend. FFB's 2008 small business market share in the Cincinnati-Middletown AA is too small to perform meaningful analyses.

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

The borrower distribution of FFB's loans in the Cincinnati-Middletown AA is good. This conclusion is based on excellent home purchase and home improvement loan distribution records coupled with good refinance and small business loan distribution records.

## ***Home Mortgage Loans***

Refer to Tables 8, 9 and 10 in the Cincinnati-Middletown AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loans 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. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income segment of the population in the community. Refer to the Market Profiles in Appendix C for the demographic information, including poverty rates.

The distribution of home purchase and home improvement loans to borrowers of different incomes is excellent and the distribution of home refinance loans is good. The percentage of loans to moderate-income borrowers exceeds the percentage of families in the AA for all three home mortgage loan product types. The percentage of home improvement loans to low-income borrowers also exceeds the percentage of families in the AA while the percentage of home purchase loans to low-income borrowers is very near to the percentage of low-income families in the AA. The percentage of home refinance loans to low-income borrowers, while lower than the percentage of low-income families in the AA, still reflects good performance. FFB's 2008 home mortgage loan market shares were too small for meaningful analysis.

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

Refer to Table 11 in the Cincinnati-Middletown AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses in the Cincinnati-Middletown AA is good. The percentage of loans to businesses with revenues of less than \$1 million or less is slightly below the percentage of small businesses within the AA.

## **Community Development Lending**

Refer to Table 1 Lending Volume in the Cincinnati-Middletown AA section of Appendix D for the facts used to evaluate the bank's level of community development (CD) lending. This table includes all CD loans, including any multi-family loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that may also qualify as CD loans. Table 5 does not separately list CD loans, however.

The bank's record of originating CD loans is good in the Cincinnati-Middletown AA. During the evaluation period, FFB originated eight CD loans totaling \$9.95 million in the area. The CD loans reflect a variety of CD purposes such as small business lending, multi-family housing, and Brownfield reclamation. While the bank's record of CD lending is significant, it did not impact the Lending Test rating in the Cincinnati-Middletown AA.

## **Product Innovation and Flexibility**

FFB offers "CHAMP" affordable housing loans which provide aggressive loan-to-value ratios without the necessity for mortgage insurance, underwriting flexibilities, the allowance of non-traditional credit history, and the use of gifts to assist with down payment and/or closing costs. During the evaluation period, the bank originated 52 CHAMP loans totaling over \$5 million.

## **INVESTMENT TEST**

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

FFB's overall Investment Test performance in the Cincinnati-Middletown AA is rated "Low Satisfactory" based on a full-scope review. FFB's responsiveness to the identified investment needs of the AA is adequate, especially in the area of affordable housing.

During the evaluation period, FFB originated 67 investments and donations in the Cincinnati-Middletown AA totaling \$1.5 million. In addition, consideration was given to the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on five prior period investments as of December 31, 2009 was \$4 million.

The majority of FFB's investments respond to the area's need for affordable housing. The largest investment made in the current period was to a capital fund that invests in geographically specific private placement debt securities designed to support underlying economic activities such as CD and affordable housing. The bank's portion of the fund includes 20 1-4 family mortgage loans to low- and moderate-income borrowers. Nineteen of the 20 loans are within the Cincinnati-Middletown AA totaling \$1.1 million. FFB also made a number of donations in the Cincinnati-Middletown AA, including \$152 thousand to an organization that provides community services to primarily low- and moderate-income individuals and families in Butler County.

Refer to Table 14 in the Cincinnati-Middletown AA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the Cincinnati-Middletown AA.

## **SERVICE TEST**

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

The bank's performance under the Service Test in the Cincinnati-Middletown AA is rated "Outstanding." Based on a full-scope review, performance in the Cincinnati-Middletown AA is excellent.

### **Retail Banking Services**

Refer to Table 15 in the Cincinnati-Middletown AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The distribution of bank branches in both low- and moderate-income geographies is excellent, as they are readily accessible to all portions of the full-scope area. The branch distribution in moderate-income geographies exceeds the percentage of the population that resides in those geographies. Twelve offices (26 percent of total branches) are located in moderate-income geographies compared to 18.3 percent of the population living in moderate-income geographies. FFB operates only one branch in a low-income geography; however, only 7.5 percent of the population resides in low-income geographies within the AA.

During the evaluation period, the bank opened five branches while closing nine. The net effect of the branch openings and closings resulted in two fewer branches in both the middle- and upper-income geographies. The branch openings and closings had a neutral impact on the accessibility of branches to residents in low- and moderate-income geographies.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are reasonable and include extended hours on Friday with branches also open Saturday mornings.

## **Community Development Services**

FFB's record of providing community development (CD) services to the Cincinnati-Middletown AA is good overall in terms of the number of groups served as well as their relationship and responsiveness to community development needs. The bank's CD services did not impact the bank's "outstanding" service test rating for the Cincinnati-Middletown AA.

Several of FFB's officers and employees hold leadership positions in various organizations that seek to fulfill identified CD needs. During the evaluation period, bank employees provided over 1,000 hours of financial guidance to six different organizations that address the community's needs, including economic revitalization, affordable housing, and services for low- and moderate-income individuals and families. For example, a senior bank officer serves on the board of directors and provides financial expertise to a non-profit CD organization that provides loans to low- and moderate-income borrowers. The bank has also partnered with the organization to work with individuals, helping to improve their creditworthiness, providing homebuyer counseling, and assisting in the loan application process. The applications are sent to FFB which underwrites and originates the loans. This partnership has led to the origination of loans to 51 individuals totaling over \$4 million dollars.

Bank employees also provided technical assistance by submitting Affordable Housing Program applications to the Cincinnati Federal Home Loan Bank (FHLB). Specifically, the bank assisted in filing two applications which totaled \$1.03 million. In addition, the bank has assisted nine customers in taking advantage of the FHLB's Welcome Home program. With the assistance that these grants provided, the bank made \$750 thousand in mortgage loans to these nine borrowers.

## State of Indiana

### CRA Rating for State of Indiana<sup>2</sup>: Satisfactory

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

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

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

The major factors that support this rating include:

- The Lake County AA (Gary, Indiana MD #23844) accounts for over 50 percent of the bank's deposits in the State of Indiana which significantly impacts the overall state ratings.
  - The geographic distribution of FFB's loans in the Lake County AA is very poor.
  - FFB does not maintain branches in low- and moderate-income geographies although 27 percent of owner-occupied homes are located in those areas, which impacts the bank's ability to lend in those geographies.
- The borrower distribution in the Lake County AA is good with an excellent home improvement loan distribution record coupled with good home purchase and small business loan distributions.
- FFB's volume of CD investments in limited-scope areas had a positive impact on the overall investment test rating. The bank's investments especially addressed the need for affordable housing. The majority of the bank's investments within its AAs are from prior periods but have an ongoing impact in those AAs.
- The significant level of broader state-wide investments of \$5.6 million made in the current evaluation period, that had potential to benefit AAs within the state, positively impacted the overall investment rating.

## Description of Institution's Operations in Indiana

FFB operates 35 branches and 48 deposit-taking ATMs in the State of Indiana. These branches represent 35% of the bank's total branch network. The bank's AA's in the state include a portion of one MD, one entire MSA, a portion of another MSA and nine entire counties that comprise the combined Indiana Non-MSA AA. Refer to Appendix A for a listing of the areas that comprise the State of Indiana AA's.

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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.

## Scope of Evaluation in Indiana

The Lake County AA was selected for a full-scope review due to its high concentration of deposits (57.8 percent), reported loans (38.6 percent), and branches (22.9 percent) within the state. The remaining AA's, including the combined non-metropolitan areas, were analyzed using limited-scope procedures. FFB deposits in Indiana represent 30 percent of the bank's total deposits. Ranked by deposits, the Indiana rating area is the second largest rating area for FFB. As such, performance in this rating area has a moderate impact on the bank's overall CRA rating.

In conjunction with this evaluation, we interviewed two community organizations that serve Lake County as well as other surrounding counties in northwest Indiana. One of the organizations distributes CD block grants and manages programs that provide affordable housing, home ownership counseling, and small business funding. The other organization provides assistance with utility costs, home weatherization projects, the Section 8 housing choice voucher program, tax preparation and financial literacy, family development (counseling services), and individual development accounts (savings account). Based on information from these contacts, ample opportunities exist for banks to participate in CD or financing programs in the Lake County area, in particular for affordable housing and affordable rental housing. Opportunities also exist for banks to provide leadership in Low Income Housing Tax Credit ("LIHTC") projects as demand for these projects is lacking as well as organizational expertise.

Refer to the market profiles for the State of Indiana in appendix C for detailed demographics and other performance context information for the Lake County AA.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the State of Indiana is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the Lake County AA is poor. The record of performance of the other AAs which received limited scope reviews had a positive impact on the Lending Test rating for the State of Indiana.

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

### Lending Activity

FFB's lending activity in the Lake County AA is poor. While the bank's borrower distribution of loans is good overall, its geographic distribution of loans is very poor. In the Lake County AA, FFB ranks seventh in deposits among 27 depository institutions and has a 6.29 percent share of the market according to June 30, 2009 FDIC deposit data. While the market is very competitive with over 200 mortgage lenders and almost 80 small business lenders, FFB's mortgage lending market share in terms of number of loans and dollar volume is significantly lower than its deposit market share. According to 2008 aggregate HMDA data, FFB ranked 25<sup>th</sup> in mortgage loan originations/purchases within the AA with less than one percent market share in terms of number and dollar volume of loans. According to 2008 aggregate CRA data, FFB ranked 14<sup>th</sup> in the number of small business loans with a 1.41 percent market share, but a 7.94 percent market share in terms of loan dollars. Given that FFB's level of multi-family and small loans to farms was so low, no analysis of these products was performed. In determining overall conclusions, significant consideration was given to the overall low level of the bank's lending activity, especially in low- and moderate-income geographies.

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

The geographic distribution of FFB's loans in the Lake County AA is very poor. This is based on a upon a significantly lower percentage of home mortgage and small business loans in low- and moderate-income geographies compared to the percentage of owner-occupied units or businesses located within those geographies.

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

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

The geographic distribution of home purchase, home improvement, and home refinance loans is very poor. Consideration was given to the limited opportunities to lend in low-income geographies due to the relatively small percentage (2.71 percent) of owner-occupied homes in those geographies; however, FFB did not originate any home purchase, home improvement or refinance loans in low-income geographies during the evaluation period. Additionally, the percentage of home purchase, home improvement, and refinance loans in moderate-income geographies was significantly less than the percentage of owner-occupied units in moderate-income geographies. The level of owner-occupied units in moderate-income geographies is indicative of ample opportunities to originate mortgage loans. While the number of multifamily loans was too small to conduct a meaningful analysis, consideration was given to two loans made in low- and moderate-income geographies.

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

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

The geographic distribution of small loans to businesses in the Lake County AA is very poor. FFB's percentage of small loans to businesses in low- and moderate-income geographies in the Lake County AA is significantly lower than the percentage of businesses located in those geographies.

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

The borrower income distribution of FFB's loans in the Lake County AA is good. This conclusion is based on an excellent home improvement loan distribution record coupled with good home purchase and small business loan distributions as well as an adequate refinance loan distribution.

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

Refer to Tables 8, 9 and 10 in the State of Indiana section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loans 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. It is especially difficult for the segment the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income segment of the population in the community. Refer to the Market Profiles in Appendix C for the demographic information, including poverty rates.

The distribution of home improvement loans to borrowers of different incomes is excellent, the distribution of home purchase loans is good, and the distribution of refinance loans is adequate. The percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA, while the percentage of home improvement loans to low-income families is very near the percentage of low-income families in the AA. The percentage of home purchase loans to moderate-income borrowers is significantly higher than the percentage of moderate-income families in the AA, while the percentage of FFB's home purchase loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The percentage of refinance loans to moderate-income borrowers is approximately the same as the percentage of moderate-income families in the AA, while the percentage of refinance loans to low-income families is significantly lower than the percentage of low-income families in the AA. FFB's 2008 home mortgage loan market shares were too small for meaningful analysis.

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

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

The borrower distribution of small loans to businesses in the Lake County AA is good. The percentage of loans to businesses with revenues of \$1 million or less is slightly below the percentage of small businesses in the AA.

### **Community Development Lending**

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

The bank's record of originating CD loans is adequate in the Lake County AA. During the evaluation period, FFB originated four CD loans totaling \$400 thousand in the AA. The CD loans were made primarily to service organizations with a primary mission of assisting low-and moderate-income individuals and families through food pantry, infant and children's programs, and childcare services. CD lending had a neutral effect on the overall lending test rating in the Lake County AA.

### **Product Innovation and Flexibility**

FFB offers "CHAMP" affordable housing loans which provide aggressive loan-to-value ratios without the necessity for mortgage insurance, underwriting flexibilities, the allowance of non-traditional credit history, and the use of gifts to assist with down payment and/or closing costs. During the evaluation period, the bank originated 15 CHAMP loans totaling over \$1.5 million in the Lake County AA.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Indiana non-MSA AA is stronger than the bank's overall low satisfactory performance in the State of Indiana. The stronger performance is due to stronger geographic home purchase and refinance loan distribution records as well as stronger borrower income distribution records for mortgage loans and small business loans. The bank's performance in the Columbus and Lafayette AAs is not consistent with the bank's overall performance in the state. The results of the limited-scope review, specifically the Indiana Non-MSA AA performance, had a positive impact on the Lending Test rating for Indiana. The Indiana Non-

MSA AA accounts for approximately 32 percent of the state's deposits and therefore carries moderate weight. Refer to the Tables 1 through 12 in the State of Indiana section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

FFB's overall Investment Test performance in the State of Indiana is rated "High Satisfactory." Based on a full-scope review, performance in the Lake County AA is poor. The bank's performance in the limited scope AAs had a positive impact on the overall Investment Test rating for the state. The bank's performance in the State of Indiana was also positively impacted by its performance in the broader state/regional area. FFB's responsiveness to the identified investment needs of the assessment area is adequate, especially in the area of affordable housing.

During the current evaluation period, FFB had seven investments and donations in the Lake County AA totaling \$14 thousand. We also considered the ongoing impact that investments made prior to the current evaluation period had within the AA. These factored most significantly in the overall investment rating for the Lake County AA. The remaining balance on three prior period investments was \$1.6 million.

The bank also made investments in funds throughout the State of Indiana, but not located within any of the bank's AAs. These investments, while not located directly within the bank's AA; either have the potential to benefit the AAs or the broader statewide area. FFB made 11 statewide investments totaling \$5.6 million in the current period and three statewide investments totaling \$404 thousand in the prior period. The significant level of investments in terms of dollars had a positive impact on the overall Investment Test rating for the State of Indiana.

Refer to Table 14 in the State of Indiana section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the statewide area.

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

Based on the limited-scope reviews, the bank's performance in the Columbus and Lafayette AAs is stronger than the bank's good level of performance in the State of Indiana due to the significantly higher level of investments in the Columbus AA where FFB made 11 investments and donations totaling \$1.9 million during the evaluation period as well as a higher level of prior period investments in the Lafayette AA. The bank's performance in the non-metropolitan AA is weaker than the overall performance in the state due to a lower level of investments. Performance in the limited-scope AAs had a positive impact on the State of Indiana Investment Test rating, due to the stronger performance in two of the three limited-scope areas.

Refer to Table 14 in the State of Indiana section of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the Service Test in the State of Indiana is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Lake County AA is poor.

## **Retail Banking Services**

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

The distribution of bank branches is very poor in the Lake County AA. The bank does not have any branches located in a low- or moderate-income geography even though nearly 36 percent of the population resides in those geographies. Of the eight branches located in Lake County, only the bank's Hessville branch provides reasonable accessibility of banking services to moderate-income geographies.

During the evaluation period, the bank opened one branch in a middle-income geography. The branch opening had a neutral impact on the accessibility of branches to residents in low- and moderate-income geographies.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are reasonable and include extended hours on Friday with branches also open Saturday mornings. The branch in Hessville does offer extended hours every day, including Saturday.

## **Community Development Services**

FFB's record of providing CD services to the Lake County AA is adequate. The bank's CD Services had a neutral effect on the bank's Service rating for the Lake County AA. Examples of FFB's services include a bank officer who provided over 100 hours serving as a Board Member on the Executive and Finance Committees for an organization that provides a variety of services to children and adults with special needs, including job training and job placement assistance. The organization primarily serves low- and moderate-income individuals. Another bank associate contributed over 20 hours serving on the Loan Committee of a community business credit corporation. The focus of the organization is to assist Indiana-based small businesses in obtaining loans to finance growth. The service benefits the broader statewide area, but has the potential to provide benefit to the Lake County AA as well.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Columbus AA and the Indiana Non-MSA AA is stronger than the bank's overall Low Satisfactory performance in the State of Indiana. The bank showed excellent distribution of bank branches and ATMs in both the Columbus AA and the Indiana Non-MSA AA. The bank's performance under the Service Test in the Lafayette AA is weaker than the bank's overall Low Satisfactory performance in the State of Indiana. Two of the three branches that were closed in the Lafayette AA during the evaluation period were located in moderate-income geographies, and now no branches are located in low- or moderate-income geographies within this AA. The bank's performance in the limited-scope AAs positively impacted the bank's overall performance under the Service Test in the State of Indiana. Greater emphasis was placed on the strong performance of the Indiana Non-MSA AA than the weaker performance in the Lafayette AA due to the majority of FFB's branches in Indiana located in the Columbus AA and Indiana Non-MSA AA and their respective deposit market shares (approximately 37 percent combined.)

## State of Ohio

<b>CRA Rating for Ohio<sup>3</sup>:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	<b>High Satisfactory</b>
<b>The investment test is rated:</b>	<b>Needs to Improve</b>
<b>The service test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include:

- The borrower distribution of FFB's home mortgage and small business lending is good in the full-scope Central Ohio AA.
- Positive consideration was given to CD loans made in the Dayton and Lima AAs. These SBA 504 loans are significant as they directly impact job creation.
- FFB did not make any significant CD investments in its Ohio AAs during the evaluation period.
- The bank's branches are reasonably accessible to moderate-income geographies in the full-scope non-MSA AA.
- Overall ratings were primarily based on the performance in the Central Ohio AA which comprises 68% of the bank's deposits.

## Description of Institution's Operations in the State of Ohio

FFB operates 19 branches and 21 deposit-taking ATMs in the State of Ohio. These branches represent 19 percent of the bank's total branch network. The bank's assessment areas in the State of Ohio include two MSAs or portions of MSAs, four entire counties that comprise the Central Ohio AA, and two entire counties that comprise the Ohio Non-MSA AA. Refer to Appendix A for a listing of the areas that comprise State of Ohio assessment areas.

## Scope of Evaluation in Ohio

The Central Ohio AA was selected for a full-scope review due to its high concentration of deposits (67.9 percent), reported loans (48.1 percent), and branches (57.9 percent) within the state. The concentration of deposits in the Central Ohio AA far exceeds those in the Dayton AA, which is the next largest assessment area in terms of deposits with 13.7% of FFB's deposits in the state. The Dayton, Lima and Ohio Non-MSA AAs were analyzed using limited-scope procedures. Deposits in Ohio represent 21 percent of the bank's total deposits. Ranked by deposits, the State of Ohio rating area is the smallest rating area FFB. Performance in this rating area has moderate impact on the bank's overall CRA rating.

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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.

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

In conjunction with this evaluation, we interviewed two community organizations that serve Van Wert and Paulding Counties, respectively. Both counties are located within the Central Ohio AA. One organization's primary purpose is to assist eligible households, primarily low- and moderate-income by meeting a broad range of emergency and other needs such as food pantries, emergency assistance, home maintenance, distribution of donated household items/appliances/furniture and home buyer assistance. The other organization is an economic development corporation that offers companies direct financial assistance in the form of low-interest rate loans and local tax incentives. The organization also offers assistance with infrastructure development and has programs for new entrepreneurs starting a new business or existing business/industry wanting to expand. Based on information from these two contacts, there is a moderate level of opportunities for banks to participate in meeting the CD and credit needs of their communities, especially with financing one-to-four family residential homes.

## **LENDING TEST**

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

The bank's performance under the Lending Test in the State of Ohio is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Central Ohio AA is good.

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

### **Lending Activity**

FFB's lending activity in the Central Ohio AA is adequate, especially considering the strong level of competition in the market. In the AA, FFB ranked second in deposits among 23 depository institutions and has a 10.89 percent share of the market according to June 30, 2009 FDIC deposit data. But with over 140 mortgage lenders and 35 small business lenders, FFB's lending market shares are lower than its deposit market shares.

FFB's primary lending products in the Central Ohio AA are home refinance loans, small loans to businesses, and home purchase loans. According to 2008 HMDA data, FFB ranked 7<sup>th</sup> or 8<sup>th</sup> in market share in terms of the number of home purchase (4.31 percent), home improvement (6.22 percent), and refinance (3.67 percent) loans in the AA. According to 2008 CRA data, FFB ranked 12<sup>th</sup> in market share in terms of the number of small business loans; however its market share of total small business loan dollars was 13.36 percent. Given that FFB's level of multi-family loans was so low, no analysis of this product was performed. Similarly, no geographic distribution analysis of small farm loans was conducted due to the very small percentage of farms located in low- and moderate-income geographies in the AA (0.2 percent combined). The volume of loans in the Lima AA for all loan products was too small to conduct a meaningful analysis.

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

The geographic distribution of FFB's loans in the Central Ohio AA is adequate; however, this assessment is based on a very small percentage of owner-occupied units (1.02 percent) and small businesses (1.47 percent) located in moderate-income geographies. There are no low-income

geographies located in the Central Ohio AA. The difference between adequate and excellent performance for any loan product would be based on one or two loans.

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

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

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

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

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

The borrower distribution of FFB's loans in the Central Ohio AA is good. This conclusion is based on excellent home purchase and small business loan borrower distribution coupled with good home improvement and refinance loan distribution as well as an adequate small farm borrower distribution record.

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

Refer to Tables 8, 9 and 10 in the State of Ohio section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loans 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. It is especially difficult for the segment the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income segment of the population in the community. Refer to the Market Profiles in Appendix C for the demographic information, including poverty rates, for the Central Ohio AA.

The borrower distribution of home purchase loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the Central Ohio AA while the percentage of home purchase loans to low-income borrowers is near the percentage of low-income families in the AA. The borrower distribution of home improvement loans to low-income borrowers significantly exceeds the percentage of low-income families in the AA while the percentage of home improvement loans to moderate-income borrowers is near the percentage of moderate-income families in the AA. The borrower distribution of refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA while the percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families in the AA.

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

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

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

The borrower distribution of small loans to businesses in the Central Ohio AA is excellent. The percentage of loans to businesses with revenues of \$1 million or less exceeds the percentage of small businesses in the AA.

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

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

The borrower distribution of small loans to farms in the Central Ohio AA is adequate. The percentage of loans to farms with revenues of \$1 million or less is less than the percentage of small farms in the AA.

### **Community Development Lending**

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

FFB made no community development loans in the Central Ohio AA during the evaluation period.

#### Additional CD Loan Activity

Consideration was given to six additional CD loans totaling \$6.1 million within the State of Ohio but not located within any of the bank's AAs. While having the potential to benefit one or more of the bank's AAs, these additional CD loans did not impact the overall rating for the State of Ohio.

### **Product Innovation and Flexibility**

FB offers "CHAMP" affordable housing loans which provide aggressive loan-to-value ratios without the necessity for mortgage insurance, underwriting flexibilities, the allowance of non-traditional credit history, and the use of gifts to assist with down payment and/or closing costs. The bank originated 15 CHAMP loans totaling nearly \$1.2 million during the evaluation period.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Ohio Non-MSA AA and Dayton AA is not inconsistent with the bank's overall high satisfactory performance for the State of Ohio. The volume of home mortgage and small business loans in the Lima AA was too small to conduct a meaningful comparison. Positive consideration was given for strong community development lending in the Lima and Dayton AAs.

## **INVESTMENT TEST**

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

FFB's performance under the investment test in the State of Ohio is rated "Needs to Improve." Based on a full scope review, performance in the Central OH AA is very poor when considering the bank's capacity and size and that some opportunities for investment exist in the AA. Investment performance

in the limited-scope area had a positive impact on the bank's overall investment performance in Ohio. The bank's performance in the State of Ohio was not impacted by its performance in the broader state/regional area.

During the evaluation period, FFB made one investment in the Central OH AA totaling less than \$1 thousand. There were no investments made in prior periods in this AA that could be considered.

The bank also made investments in funds throughout the State of Ohio, but not located within any of the bank's AAs. These investments, while not located directly within the bank's AAs, either have the potential to benefit the AAs or the broader statewide area. FFB made one statewide investment totaling \$86 thousand in the current period and one statewide investment with a remaining balance totaling \$214 thousand in a prior period. These investments did not impact the overall investment test rating for the state.

Refer to Table 14 in the State of Ohio section of Appendix D and the Statewide Qualified Investments section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the statewide area.

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

Based on limited-scope reviews, the bank's performance in the Ohio Non-MSA AA is stronger than the bank's performance in the State of Ohio due to a higher level of investments. The bank's performance in the Lima and Dayton AAs is not inconsistent with the overall performance in the State of Ohio. Performance in the limited-scope AAs had a positive impact on the State of Ohio Investment Test rating due to the stronger performance in the Ohio Non-MSA AA which represents 11% of statewide deposits.

Refer to the Table 14 in the State of Ohio section of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the Service Test in the State of Ohio is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Central Ohio Non-MSA AA is adequate.

### **Retail Banking Services**

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

The distribution of bank branches is adequate in the Central Ohio AA. Although the bank does not have any branches located in a low- or moderate-income geography, only 1.32% of the population resides in those geographies. In fact, only one of the geographies within the AA is designated as moderate-income and none are designated as low-income. Two of the bank's eleven branches in the assessment area are in close proximity to the moderate-income geography and provide reasonable accessibility to that geography.

During the evaluation period, the bank opened one branch while closing two others. There was no net change in the number of branches located within each income level geography. The branch opening

and closing had a neutral impact on the accessibility of branches to residents in low- and moderate-income geographies.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are reasonable and include extended hours on Friday with branches also open Saturday mornings.

### **Community Development Services**

FFB provided minimal Community Development Services to the Central Ohio AA.

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

Based on a limited-scope review, the bank's performance under the Service Test in the Lima AA and Ohio Non-MSA AA had no impact on the bank's overall performance under the Service Test in the State of Ohio. There are no low- or moderate-income geographies within these two AAs. Performance in the Dayton AA is weaker than the bank's low satisfactory performance under the Service Test in the State of Ohio. Although the bank had a good level of Community Development Services for the Dayton AA, the branch distribution was poor with none of the bank's branches located in a low- or moderate-income geography although nearly 28.5 percent of the population resides in low- or moderate-income geographies. The bank also closed a branch that was located in a moderate-income geography while opening one in an upper-income geography. The conclusions for areas receiving limited-scope reviews had a neutral impact on the conclusions regarding the bank's overall performance for the State of Ohio under the Service Test.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): (01/01/05 to 12/31/09) Investment and Service Tests and CD Loans: (11/08/05 to 05/31/10)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
First Financial Bank, National Association Hamilton, OH	Home Purchase Home Improvement Refinances Small Loans to Businesses Small Loans to Farms Community Development Loans/Investments	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
<i>None Reviewed</i>		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b> (Reflects counties in non-MSA areas and/or counties in MSAs or MDs where whole MSAs or MDs were not selected)
Cincinnati-Middletown OH-KY-IN MSA #17140 (Partial) ("Cincinnati-Middletown AA")	Full-Scope	(Ohio- Butler, Hamilton Counties) (Kentucky – Boone County) (Indiana – Dearborn, Franklin, Ohio Counties)
<u>State of Indiana</u> Gary Indiana MD # 23844 (Partial) ("Lake County AA")	Full-Scope	Lake County
Columbus Indiana MSA #18020 ("Columbus AA")	Limited-Scope	
Lafayette MSA #29140 (Partial) ("Lafayette AA")	Limited-Scope	Carroll, Tippecanoe Counties

Indiana Non-MSA ("Indiana Non-MSA AA")	Limited-Scope	Blackford, Clinton, Decatur, Fayette, Fulton, Jay, Randolph, Rush, Wabash Counties
<u>State of Ohio</u> Central Ohio Non-MSA ("Central Ohio AA")	Full-Scope	Auglaize, Mercer, Paulding, Van Wert Counties
Dayton Ohio MSA #19380 (Partial) ("Dayton AA")	Limited-Scope	Montgomery, Preble Counties
Lima Ohio MSA #20620 (Partial) ("Lima AA")	Limited-Scope	Allen County (Partial)
Ohio Non-MSA ("Ohio Non-MSA AA")	Limited-Scope	Sandusky, Williams Counties

## Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS      First Financial Bank, National Association				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
First Financial Bank, National Association	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Cincinnati-Middletown OH-KY-IN MSA #17140	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
State of Indiana	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Ohio	High Satisfactory	Needs to Improve	Low Satisfactory	Satisfactory

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

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

### Cincinnati-Middletown Multistate AA

Demographic Information for Full Scope Area: Cincinnati-Middletown MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	366	12.02	21.86	41.80	23.22	1.10
Population by Geography	1,490,746	7.48	18.29	44.19	29.91	0.13
Owner-Occupied Housing by Geography	382,510	2.55	14.51	48.21	34.73	0.00
Business by Geography	104,261	5.97	18.96	43.44	30.56	1.07
Farms by Geography	2,449	1.59	10.66	57.74	29.89	0.12
Family Distribution by Income Level	388,197	18.91	18.03	22.71	40.35	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	143,377	12.60	26.90	45.20	15.30	0.00
Median Family Income		54,771	Median Housing Value		120,691	
HUD Adjusted Median Family Income for 2009		69,200	Unemployment Rate (12/2009)		9.9%	
Households Below Poverty Level (2008)		11.3%				

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

Source: 2000 US Census and 2009 HUD updated MFI

The Cincinnati-Middletown Multistate AA is comprised of most of the Cincinnati-Middletown MSA. The AA includes seven contiguous counties across three states: Butler, Warren, and Hamilton Counties in Ohio, Dearborn, Franklin, and Ohio Counties in Indiana, and Boone County in Kentucky. The AA contains 366 census tracts of which 12.02% are low-income, 21.86% are moderate-income, 41.80% are middle-income, and 23.22% are upper-income. Additionally, 1.10% of the census tracts in the AA do not have income information and are characterized as NA (unknown). The 2009 HUD adjusted median family income for the AA is \$69,200. Approximately 11% of households in the AA fall below the poverty line. Unemployment remains particularly high at 9.9% around the national average. Job creation is a major need.

As of June 30, 2009, FFB had \$1.46 billion in deposits in the Cincinnati-Middletown AA which ranked seventh with a 2.69% market share of deposits. Banking competition is strong with 82 banking organizations represented in the market with 853 branches operating in the MSA. The market is fairly concentrated with three of the banks, Fifth Third, U.S Bank, and PNC/National City, holding over 70% of the deposits. FFB operated 34 branches as of June 30, 2009. As a result of the Peoples Community Bank acquisition, the bank increased the number of branches in the AA to 47 branches and 59 ATMs, including 43 deposit-taking ATMs.

The Cincinnati economy is in the midst of a modest recovery in line with the rest of the U.S. The labor market appears to have reached a bottom and is starting to show small monthly gains. There has been a structural shift in the job market as healthcare/education services replace some of the manufacturing jobs which have been eliminated. Weaknesses still remain in the public and retail sectors. Although prospects for growth in the short-term are fairly muted, there is optimism for a modest and stable growth over the medium term.

**Lake County AA**

Demographic Information for Full Scope Area: Lake County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	112	12.50	33.04	37.50	16.96	0.00
Population by Geography	484,564	5.69	30.17	41.69	22.45	0.00
Owner-Occupied Housing by Geography	125,323	2.71	24.95	45.60	26.74	0.00
Business by Geography	32,473	6.07	21.46	41.61	30.86	0.00
Farms by Geography	513	1.75	9.94	55.56	32.75	0.00
Family Distribution by Income Level	127,637	22.62	18.53	22.51	36.34	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	52,524	9.61	41.46	36.69	12.24	0.00
Median Family Income HUD Adjusted Median Family Income for 2009 Households Below Poverty Level (2008)		52,518 64,500 14.2%	Median Housing Value Unemployment Rate (12/2009)	95,020 10.0%		

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

Source: 2000 US Census and 2009 HUD updated MFI

The Lake County AA is comprised entirely of Lake County, Indiana. Lake County, Indiana is a part of the Chicago MSA and the Gary, Indiana Metropolitan Division. The county contains 112 census tracts of which 12.50% are low-income, 33.04% are moderate-income, 37.50% are middle-income, and 16.96% are upper-income. The 2009 HUD adjusted median family income for the AA is \$64,500. Approximately 14% of households in the AA fall below the poverty line. Unemployment remains particularly high at 10.0% around the national average. Job creation is a major need.

As of June 30, 2009, FFB had \$468 million in deposits in the Lake County market which ranked seventh with a 6.29% market share of deposits. Banking competition is fairly strong with 27 FDIC insured institutions represented in the market with 185 branches operating in the MSA. The market is fairly competitive with the top three banks, JP Morgan Chase, Centier Bank, and First Midwest Bank, holding approximately 45% of the county's deposits. Currently, the bank operates eight branches and sixteen ATMs, including six deposit ATMs, in the county.

The Gary (Lake County) economy is improving, but the labor market continues to struggle. The labor market is being constrained by the leisure/hospitality sector as the local industry has come to rely on casinos. It is anticipated that weak consumer confidence will keep discretionary spending, such as at casinos, at a modest level for some time. Manufacturing and industrial activity are expected to recover modestly. The area continues to be a low-cost alternative to living in Chicago as houses are affordable and retaining their value. However, the local economy continues to remain heavily dependent on manufacturing, particularly steel.

**Central Ohio AA**

Demographic Information for Full Scope Area: Central Ohio AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	33	0.00	3.03	84.85	12.12	0.00
Population by Geography	137,487	0.00	1.32	85.05	13.63	0.00
Owner-Occupied Housing by Geography	41,351	0.00	1.02	85.89	13.09	0.00
Business by Geography	9,075	0.00	1.47	86.74	11.79	0.00
Farms by Geography	1,474	0.00	0.20	80.80	19.00	0.00
Family Distribution by Income Level	38,096	11.88	17.29	26.29	44.54	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	11,115	0.00	2.02	88.32	9.66	0.00
Median Family Income HUD Adjusted Median Family Income for 2009 Households Below Poverty Level (2008)		43,801 53,800 14.9%	Median Housing Value Unemployment Rate(12/2009)		86,595 11.4%	

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

Source: 2000 US Census and 2009 HUD updated MFI

The Central Ohio Non-MSA AA is comprised of four contiguous counties, Allen, Auglaize, Van Wert, and Mercer, located in the west central part of Ohio. The counties are north of the Dayton MSA and west of the Lima MSA. The assessment area contains 33 census tracts of which 0.00% are low-income, 3.03% are moderate-income, 84.85% are middle-income, and 12.12% are upper-income. The 2009 HUD adjusted median family income for the AA is \$53,800. Approximately 15% of households in the AA fall below the poverty line. Unemployment remains particularly high at 11.4% during the current recessionary period which is higher than the national average near 10% and the State of Ohio as a whole at 10.7%. Job creation is a major need.

As of June 30, 2009, FFB had \$406 million in deposits in the Central Ohio AA market which ranked second with a 10.89% market share of deposits. Banking competition is fairly strong with 23 FDIC insured institutions represented in the market with 94 branches operating in the area. JP Morgan Chase with 15.34% of deposits has the highest market share. The market is fairly competitive with the top three banks, JP Morgan Chase, FFB, and Citizens National Bank of Bluffton, holding approximately 45% of the area's deposits. Currently, the bank operates 11 branches and 13 ATMs, including 11 deposit ATMs across the four counties.

## Appendix D: Tables of Performance Data

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## Content of Standardized Tables

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

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

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

on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original

investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

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

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

**Table 1. Lending Volume**

LENDING VOLUME													Geography: CINCINNATI-MIDDLETOWN				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009			
Assessment Area :	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***								
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)									
<b>Full Review:</b>																				
Cincinnati-Middletown MSA	100.00	1,983	256,500	2,975	443,862	84	4,911	8	9,950	5,050	715,223	100.00								

\* Loan Data as of December 31, 2009. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from November 08, 2005 to May 31, 2010.

\*\*\* Deposit Data as of June 30, 2009. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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

Geographic Distribution: HOME PURCHASE		Geography: CINCINNATI-MIDDLETOWN					Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Cincinnati-Middletown MSA	828	100.00	2.55	0.48	14.51	18.24	48.21	51.93	34.73	29.35	0.57	0.18	0.73	0.70	0.40	

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

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

Geographic Distribution: HOME IMPROVEMENT		Geography: CINCINNATI-MIDDLETOWN								Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					
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
<b>Full Review:</b>															
Cincinnati-Middletown MSA	141	100.00	2.55	0.71	14.51	31.91	48.21	48.94	34.73	18.44	0.43	0.00	1.11	0.29	0.40

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: CINCINNATI-MIDDLETOWN												Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009				
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	
<b>Full Review:</b>																
Cincinnati-Middletown MSA	988	100.00	2.55	1.42	14.51	17.61	48.21	50.51	34.73	30.46	0.73	1.01	1.16	0.79	0.56	

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

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

Geographic Distribution: MULTIFAMILY		Geography: CINCINNATI-MIDDLETOWN						Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009									
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*						
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Cincinnati-Middletown MSA	26	100.00	19.51	7.69	24.98	26.92	37.95	50.00	17.56	15.39	4.71	4.35	5.77	6.56	0.00		

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: CINCINNATI-MIDDLETOWN												Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009				
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 Businessses***	% BANK Loans	% of Businessses***	% BANK Loans	% of Businessses***	% BANK Loans	% of Businessses***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Cincinnati-Middletown MSA	2,935	100.00	5.97	3.10	18.96	20.34	43.44	48.31	31.63	28.25	1.54	1.52	2.40	1.70	1.07	

\* Based on 2008 Peer Small Business Data -- US and PR

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

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

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

Geographic Distribution: SMALL LOANS TO FARMS		Geography: CINCINNATI-MIDDLETOWN						Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009							
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
<b>Full Review:</b>															
Cincinnati-Middletown MSA	84	100.00	1.59	0.00	10.66	2.38	57.74	91.67	30.01	5.95	5.96	0.00	0.00	8.11	2.90

\* Based on 2008 Peer Small Business Data -- US and PR

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

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

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

Borrower Distribution: HOME PURCHASE		Geography: CINCINNATI-MIDDLETOWN								Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families§	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Cincinnati-Middletown MSA	828	100.00	18.91	18.67	18.03	28.57	22.71	23.31	40.35	29.45	0.62	1.58	0.67	0.46	0.41

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

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

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

Borrower Distribution: HOME IMPROVEMENT		Geography: CINCINNATI-MIDDLETOWN								Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans***	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Cincinnati-Middletown MSA	141	100.00	18.91	33.08	18.03	27.07	22.71	21.05	40.35	18.80	0.44	0.63	0.74	0.00	0.54

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 5.7% of loans originated and purchased by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE      Geography: CINCINNATI-MIDDLETOWN      Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009															
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families ††	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans***	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Cincinnati-Middletown MSA	988	100.00	18.91	12.06	18.03	22.58	22.71	27.22	40.35	38.14	0.84	1.03	0.84	0.82	0.82

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CINCINNATI-MIDDLETOWN			Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Cincinnati-Middletown MSA	2,975	100.00	61.15	57.48	63.03	19.43	17.55	1.54	3.13

\* Based on 2008 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 14.32% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: CINCINNATI-MIDDLETOWN			Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
Cincinnati-Middletown MSA	84	100.00	96.82	76.19	84.52	15.48	0.00	5.96	7.18

\* Based on 2008 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 20.24% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: CINCINNATI-MIDDLETOWN				Evaluation Period: NOVEMBER 8, 2005 TO MAY 31, 2010			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Cincinnati-Middletown MSA	5	4,009	67	1,500	72	5,509	100.00	1	673

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: CINCINNATI-MIDDLETOWN							
Evaluation Period: NOVEMBER 8,, 2005 TO MAY 31, 2010																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Cincinnati-Middletown MSA	100.00	45 *	100.00	2.22	26.67	40.00	31.11	4	9	0	0	- 3	- 2	7.48	18.29	44.25	29.98

\* Does not include one branch located in a geography with unknown income information.

**Table 1. Lending Volume**

LENDING VOLUME		Geography: INDIANA				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009						
Assessment Area :	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Lake County AA	38.61	666	86,876	418	80,255	3	253	4	400	1,091	167,784	52.77
<b>Limited Review:</b>												
Columbus AA	14.33	208	30,320	141	22,928	55	4,185	1	1,543	405	58,976	4.43
Indiana Non-MSA AA	28.52	309	23,493	329	46,141	168	15,477	0	0	806	85,111	32.35
Lafayette AA	18.54	204	22,689	196	21,547	121	13,323	3	1,805	524	59,364	10.45

\* Loan Data as of December 31, 2009. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from November 08, 2005 to May 31, 2010.

\*\*\* Deposit Data as of June 30, 2010. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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

Geographic Distribution: HOME PURCHASE			Geography: INDIANA				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Lake County AA	233	44.30	2.71	0.00	24.95	1.72	45.60	56.65	26.74	41.63	1.00	0.00	0.13	1.10	1.15	
<b>Limited Review:</b>																
Columbus AA	111	21.10	0.00	0.00	11.17	13.51	70.83	68.47	18.00	18.02	2.79	0.00	5.34	2.61	2.13	
Indiana Non-MSA AA	105	19.96	0.00	0.00	4.54	5.71	91.50	89.52	3.96	4.77	1.55	0.00	3.67	1.45	1.08	
Lafayette AA	77	14.64	0.21	0.00	7.90	3.90	62.11	74.03	29.78	22.07	0.48	0.00	0.00	0.79	0.22	

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

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

Geographic Distribution: HOME IMPROVEMENT			Geography: INDIANA				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Lake County AA	34	43.04	2.71	0.00	24.95	11.76	45.60	61.76	26.74	26.48	1.20	0.00	0.47	1.37	1.63	
<b>Limited Review:</b>																
Columbus AA	9	11.39	0.00	0.00	11.17	33.33	70.83	66.67	18.00	0.00	2.49	0.00	10.53	2.34	0.00	
Indiana Non-MSA AA	23	29.11	0.00	0.00	4.54	0.00	91.50	100.00	3.96	0.00	0.74	0.00	0.00	0.82	0.00	
Lafayette AA	13	16.46	0.21	0.00	7.90	0.00	62.11	100.00	29.78	0.00	1.53	0.00	0.00	2.30	0.00	

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: INDIANA						Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009						
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
<b>Full Review:</b>															
Lake County AA	395	51.37	2.71	0.00	24.95	3.29	45.60	37.97	26.74	58.74	0.86	0.00	0.16	0.83	1.21
<b>Limited Review:</b>															
Columbus AA	85	11.05	0.00	0.00	11.17	7.06	70.83	68.24	18.00	24.70	1.10	0.00	0.88	1.04	1.31
Indiana Non-MSA AA	178	23.15	0.00	0.00	4.54	3.93	91.50	91.57	3.96	4.50	1.32	0.00	1.33	1.35	0.77
Lafayette AA	111	14.43	0.21	0.00	7.90	3.60	62.11	84.68	29.78	11.72	1.11	0.00	0.00	1.51	0.69

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

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

Geographic Distribution: MULTIFAMILY		Geography: INDIANA					Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Lake County AA	4	30.77	13.32	25.00	30.35	25.00	41.88	25.00	14.45	25.00	1.54	0.00	0.00	0.00	11.11	
<b>Limited Review:</b>																
Columbus IN MSA	3	23.08	0.00	0.00	35.23	100.00	47.85	0.00	16.92	0.00	50.00	0.00	66.67	0.00	0.00	
Indiana Non-MSAs	3	23.08	0.00	0.00	10.12	33.33	86.82	66.67	3.06	0.00	18.18	0.00	50.00	11.11	0.00	
Lafayette MSA	3	23.08	27.82	0.00	23.72	0.00	20.98	66.67	27.48	33.33	2.44	0.00	0.00	7.14	0.00	

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: INDIANA				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009				
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 Businessses***	% BANK Loans	% of Businessses***	% BANK Loans	% of Businessses***	% BANK Loans	% of Businessses***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
<b>Full Review:</b>																				
Lake County AA	418	38.56	6.07	0.72	21.46	6.22	41.61	43.54	30.86	49.52	1.41	0.34	0.77	1.68	1.51					
<b>Limited Review:</b>																				
Columbus AA	141	13.01	0.00	0.00	29.51	36.17	55.28	58.16	15.21	5.67	3.32	0.00	3.50	4.08	1.15					
Indiana AA	329	30.35	0.00	0.00	7.31	4.26	89.93	94.53	2.76	1.21	2.07	0.00	2.21	2.22	0.60					
Lafayette AA	196	18.08	4.69	1.02	26.07	17.86	45.10	65.82	24.14	15.30	1.99	0.52	2.22	2.81	0.89					

\* Based on 2008 Peer Small Business Data -- US and PR

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

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

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

Geographic Distribution: SMALL LOANS TO FARMS			Geography: INDIANA				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans						
<b>Full Review:</b>																
Lake County AA	3	0.86	1.75	0.00	9.94	0.00	55.56	33.33	32.75	66.67	2.27	0.00	0.00	0.00	4.76	
<b>Limited Review:</b>																
Columbus AA	55	15.85	0.00	0.00	5.78	0.00	84.12	96.36	10.10	3.64	13.24	0.00	0.00	13.33	14.29	
Indiana Non-MSA AA	168	48.41	0.00	0.00	1.26	1.79	94.59	94.64	4.15	3.57	5.13	0.00	0.00	5.36	4.17	
Lafayette MSA	121	34.87	0.00	0.00	3.95	4.96	76.16	95.04	19.89	0.00	25.00	0.00	40.00	29.53	0.00	

\* Based on 2008 Peer Small Business Data -- US and PR

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

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

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

Borrower Distribution: HOME PURCHASE		Geography: INDIANA					Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Families* **	% BANK Loans* ***	% Families	% BANK Loans ****	% Families ***	% BANK Loans* *	% Families ***	% BANK Loans****						
<b>Full Review:</b>																
Lake County AA	233	44.30	22.62	10.27	18.53	26.79	22.51	27.68	36.34	35.26	1.12	0.45	0.93	1.38	1.19	
<b>Limited Review:</b>																
Columbus AA	111	21.10	17.59	13.51	19.75	34.23	24.22	23.42	38.44	28.84	3.29	3.23	4.95	4.12	1.76	
Indiana Non-MSA AA	105	19.96	16.60	17.14	20.90	40.00	26.47	21.90	36.03	20.96	1.78	2.69	2.17	1.52	1.15	
Lafayette AA	77	14.64	18.19	22.54	18.87	29.58	24.66	25.35	38.29	22.53	0.53	0.84	0.58	0.66	0.33	

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.9% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT		Geography: INDIANA						Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Lake County AA	34	43.04	22.62	21.21	18.53	24.24	22.51	24.24	36.34	30.31	1.25	0.83	1.50	0.89	1.50
<b>Limited Review:</b>															
Columbus AA	9	11.39	17.59	12.50	19.75	12.50	24.22	37.50	38.44	37.50	2.54	0.00	1.69	3.28	3.61
Indiana Non-MSA AA	23	29.11	16.60	13.64	20.90	27.27	26.47	13.64	36.03	45.45	0.76	0.00	2.17	0.00	0.54
Lafayette AA	13	16.46	18.19	23.08	18.87	23.08	24.66	23.08	38.28	30.76	1.59	0.00	1.82	2.13	1.57

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.8% of loans originated and purchased by bank.

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: INDIANA				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families ‡‡	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans***						
<b>Full Review:</b>																
Lake County AA	395	51.37	22.62	6.15	18.53	18.46	22.51	31.28	36.34	44.11	1.00	0.69	0.87	1.06	1.10	
<b>Limited Review:</b>																
Columbus AA	85	11.05	17.59	12.94	19.75	16.47	24.22	17.65	38.44	52.94	1.29	0.85	0.38	0.59	2.33	
Indiana Non-MSA AA	178	23.15	16.60	20.00	20.90	25.14	26.47	30.29	36.03	24.57	1.50	3.75	1.29	1.31	1.15	
Lafayette AA	111	14.43	18.19	16.51	18.87	22.94	24.66	31.19	38.28	29.36	1.34	5.30	1.61	0.69	1.05	

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: INDIANA			Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Lake County AA	418	38.56	63.39	56.46	55.26	18.90	25.84	1.41	3.33
<b>Limited Review:</b>									
Columbus AA	141	13.01	60.63	53.90	58.16	24.82	17.02	3.32	9.02
Indiana Non-MSA AA	329	30.35	62.16	59.27	69.60	14.29	16.11	2.07	3.24
Lafayette AA	196	18.08	62.75	59.69	71.43	17.35	11.22	1.99	5.14

\* Based on 2008 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 20.20% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: INDIANA			Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Lake County AA	3	0.86	96.69	66.67	66.67	33.33	0.00	2.27	0.00
<b>Limited Review:</b>									
Columbus AA	55	15.85	98.92	90.91	72.73	21.82	5.45	13.24	15.00
Indiana Non-MSA AA	168	48.42	98.65	72.62	69.64	23.21	7.15	5.13	6.17
Lafayette AA	121	34.87	97.04	69.42	61.16	27.27	11.57	25.00	36.51

\* Based on 2008 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 22.19% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: INDIANA				Evaluation Period: NOVEMBER 8, 2005 TO MAY 31, 2010			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Lake County AA	3	1,627	7	14	10	1,641	16.00	0	0
<b>Limited Review:</b>									
Columbus AA	0	0	1	1,877	1	1,877	18.30	1	2,035
Indiana Non-MSA AA	2	161	8	92	10	253	2.47	0	0
Lafayette AA	2	525	5	5	7	530	5.17	0	0
Statewide Qualified Investments with potential benefit to one or more AAs	3	404	11	5,551	14	5,955	58.06	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: INDIANA							
Evaluation Period: NOVEMBER 8, 2005 TO MAY 31, 2010																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch s	% of Rated Area Branch s in AA	Location of Branches by Income of Geographies (%)				# of Branch Opening s	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Lake County AA	52.77	8	22.86	0.00	0.00	50.00	50.00	1	0	0	0	1	0	5.69	30.17	41.69	22.45
<b>Limited Review:</b>																	
Columbus AA	4.43	7	20.00	0.00	28.57	57.14	14.29	0	0	0	0	0	0	0.00	16.97	66.59	16.43
Indiana Non-MSA AA	32.35	17	48.57	0.00	11.76	88.24	0.00	0	11	0	0	- 11	0	0.00	5.32	90.98	3.69
Lafayette AA	10.45	3	8.57	0.00	0.00	66.67	33.33	0	3	0	- 2	- 1	0	10.27	11.80	48.69	25.20

**Table 1. Lending Volume**

LENDING VOLUME		Geography: OHIO				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009						
Assessment Area :	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Central Ohio AA	48.02	468	44,790	245	33,600	182	22,007	0	0	895	100,397	67.88
<b>Limited Review:</b>												
Dayton AA	33.96	164	18,951	404	61,141	62	2,939	3	5,524	633	88,555	13.68
Lima AA	1.98	19	1,786	7	705	10	1,265	1	3,933	37	7,689	6.95
Ohio Non-MSA AA	16.04	132	13,475	114	12,544	50	4,053	3	600	299	30,672	11.49
Statewide CD Loans with potential benefit to one or more AAs								6	6,124			

\* Loan Data as of December 31, 2009. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from November 8, 2005 to May 31, 2010.

\*\*\* Deposit Data as of June 30, 2009. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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

Geographic Distribution: HOME PURCHASE		Geography: OHIO					Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Central Ohio AA	184	61.74	0.00	0.00	1.02	1.63	85.89	91.30	13.09	7.07	4.31	0.00	25.0	4.36	2.84	
<b>Limited Review:</b>																
Dayton AA	48	16.11	2.70	0.00	18.36	10.42	51.79	64.58	27.15	25.00	0.12	0.00	0.00	0.14	0.12	
Lima AA	4	1.34	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	1.80	0.00	0.00	1.80	0.00	
Ohio Non-MSA AA	62	20.81	0.00	0.00	0.00	0.00	79.17	95.16	20.83	4.84	0.98	0.00	0.00	1.16	0.00	

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

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

Geographic Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Central Ohio AA	34	53.13	0.00	0.00	1.02	0.00	85.89	88.24	13.09	11.76	6.22	0.00	0.00	6.25	6.90	
<b>Limited Review:</b>																
Dayton AA	22	34.38	2.70	0.00	18.36	0.00	51.79	100.00	27.15	0.00	0.22	0.00	0.00	0.43	0.00	
Lima AA	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Ohio Non-MSA AA	8	12.50	0.00	0.00	0.00	0.00	79.17	87.50	20.83	12.50	0.92	0.00	0.00	0.56	2.56	

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Central Ohio AA	249	60.00	0.00	0.00	1.02	1.20	85.89	85.94	13.09	12.86	3.68	0.00	15.38	3.47	4.29	
<b>Limited Review:</b>																
Dayton AA	89	21.45	2.70	0.00	18.36	8.99	51.79	61.80	27.15	29.21	0.42	0.00	0.54	0.29	0.61	
Lima AA	15	3.61	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	1.90	0.00	0.00	1.90	0.00	
Ohio Non-MSA AA	62	14.94	0.00	0.00	0.00	0.00	79.17	82.26	20.83	17.74	0.96	0.00	0.00	0.97	0.93	

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

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

Geographic Distribution: MULTIFAMILY		Geography: OHIO					Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Central Ohio AA	1	16.67	0.00	0.00	6.82	0.00	90.13	100.00	3.05	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Dayton AA	5	83.33	10.67	0.00	22.17	20.00	47.57	80.00	19.59	0.00	0.00	0.00	0.00	0.00	0.00	
Lima AA	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Ohio Non-MSA AA	0	0.00	0.00	0.00	0.00	0.00	96.42	0.00	3.58	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: OHIO				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Businessses***	% BANK Loans	% of Businessses***	% BANK Loans	% of Businessses***	% BANK Loans	% of Businessses***	% BANK Loans						
<b>Full Review:</b>																
Central Ohio AA	245	31.82	0.00	0.00	1.47	0.41	86.74	95.51	11.79	4.08	2.94	0.00	0.00	3.43	1.28	
<b>Limited Review:</b>																
Dayton AA	404	52.47	8.96	6.44	20.98	10.64	43.22	63.37	26.84	19.55	0.74	1.97	0.40	0.69	0.90	
Lima AA	7	0.91	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.29	0.00	0.00	0.60	0.00	
Ohio Non-MSA AA	114	14.80	0.00	0.00	0.00	0.00	83.34	80.70	16.66	19.30	1.87	0.00	0.00	2.28	0.74	

\* Based on 2008 Peer Small Business Data -- US and PR

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

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

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

Geographic Distribution: SMALL LOANS TO FARMS			Geography: OHIO				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans						
<b>Full Review:</b>																
Central Ohio AA	182	59.87	0.00	0.00	0.20	0.00	80.80	97.25	19.00	2.75	12.87	0.00	0.00	13.92	5.66	
<b>Limited Review:</b>																
Dayton AA	62	20.39	1.61	0.00	10.30	0.00	71.46	100.00	16.63	0.00	7.14	0.00	0.00	8.49	0.00	
Lima AA	10	3.29	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	2.75	0.00	0.00	3.45	0.00	
Ohio Non-MSA AA	50	16.45	0.00	0.00	0.00	0.00	64.84	66.00	35.16	34.00	5.20	0.00	0.00	3.50	12.77	

\* Based on 2008 Peer Small Business Data -- US and PR

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

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

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

Borrower Distribution: HOME PURCHASE		Geography: OHIO						Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans***	% Families	% BANK Loans****	% Families**	% BANK Loans**	% Families*	% BANK Loans****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Central Ohio AA	184	61.74	11.88	8.89	17.29	36.11	26.29	26.67	44.54	28.33	4.70	3.45	7.34	3.17	4.18
<b>Limited Review:</b>															
Dayton AA	48	16.11	20.58	10.87	19.36	23.91	22.61	30.43	37.45	34.79	0.12	0.00	0.20	0.06	0.14
Lima AA	4	1.34	15.15	0.00	17.94	25.00	24.89	0.00	42.02	75.00	2.06	0.00	2.94	0.00	4.00
Ohio Non-MSA AA	62	20.81	13.29	19.35	18.38	30.65	25.16	11.29	43.17	38.71	1.18	1.61	1.15	0.00	2.06

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.0% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans***	% Families	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
<b>Full Review:</b>																
Central Ohio AA	34	53.13	11.88	20.59	17.29	14.71	26.29	44.12	44.54	20.58	6.32	28.57	5.41	13.04	0.00	
<b>Limited Review:</b>																
Dayton AA	22	34.37	20.58	27.27	19.36	36.36	22.61	27.27	37.45	9.10	0.23	0.88	0.00	0.44	0.00	
Lima AA	0	0.00	15.15	0.00	17.94	0.00	24.89	0.00	42.02	0.00	0.00	0.00	0.00	0.00	0.00	
Ohio Non-MSA AA	8	12.50	13.29	12.50	18.38	12.50	25.16	37.50	43.17	37.50	0.94	0.00	0.00	0.00	2.25	

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans***	Over all	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Central Ohio AA	249	60.00	11.88	8.13	17.29	18.29	26.29	30.89	44.54	42.69	4.08	4.82	2.52	4.24	4.61	
<b>Limited Review:</b>																
Dayton AA	89	21.45	20.58	17.39	19.36	14.49	22.61	18.84	37.45	49.28	0.18	0.19	0.00	0.12	0.31	
Lima AA	15	3.61	15.15	20.00	17.94	6.67	24.89	53.33	42.02	20.00	2.08	4.35	2.04	4.76	0.00	
Ohio Non-MSA AA	62	14.94	13.29	9.84	18.38	11.48	25.16	34.43	43.17	44.25	1.09	3.23	0.00	1.45	1.08	

\* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: OHIO		Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Central Ohio AA	245	31.82	55.02	62.45	71.84	13.47	14.69	2.94	6.13
<b>Limited Review:</b>									
Dayton AA	404	52.46	61.87	58.17	62.87	15.59	21.53	0.74	1.67
Lima AA	7	0.91	58.20	85.71	85.71	0.00	14.29	0.29	0.57
Ohio Non-MSA AA	114	14.81	62.00	63.16	70.18	20.18	9.65	1.87	3.70

\* Based on 2008 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 18.44% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: OHIO			Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Central Ohio AA	182	59.87	99.25	76.92	60.99	25.27	13.74	12.87	15.14
<b>Limited Review:</b>									
Dayton AA	62	20.39	97.92	91.94	87.10	11.29	1.61	7.14	7.07
Lima AA	10	3.29	99.12	90.00	70.00	20.00	10.00	2.75	2.96
Ohio Non-MSA AA	50	16.45	98.11	68.00	74.00	22.00	4.00	5.20	5.70

\* Based on 2008 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 18.75% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: OHIO				Evaluation Period: NOVEMBER 8, 2005 TO MAY 31, 2010			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Central Ohio AA	0	0	1	0	1	0	0.00	0	0
<b>Limited Review:</b>									
Dayton MSA	2	92	3	6	5	98	7.56	0	0
Lima MSA	1	1	0	0	1	1	.08	0	0
Ohio Non-MSA AA	3	896	1	1	4	897	69.21	0	0
Statewide Qualified Investments with potential benefit to one or more AAs	1	214	1	86	2	300	23.15	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: OHIO							
Evaluation Period: NOVEMBER 8, 2005 TO MAY 31, 2010																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Central Ohio Non-MSA	67.88	11	57.90	0.00	0.00	90.91	9.09	1	2	0	0	-1	0	0.00	1.32	85.05	13.63
<b>Limited Review:</b>																	
Dayton MSA	13.68	4	21.05	0.00	0.00	50.00	50.00	1	1	0	- 1	0	1	4.68	23.77	48.05	23.50
Lima MSA	6.95	1	5.26	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	0.00	100.0	0.00
Ohio Non-MSAs	11.49	3	15.79	0.00	0.00	100.0	0.00	0	1	0	0	0	-1	0.00	0.00	81.21	18.79

**Table 1. Lending Volume**

LENDING VOLUME - ADDITIONAL CD LOAN DATA												Geography: REGIONAL / OUTSIDE OF ANY AA		Evaluation Period: NOVEMBER 8, 2005 TO MAY 31, 2010	
MA/Assessment Area (2007):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)				
<b>Limited Review:</b>															
CD Loans in Regional Area with no potential to benefit any AA									249	129,912					

\*\* The evaluation period for Community Development Loans is from November 8, 2005 to May 31, 2010.