



# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **PUBLIC DISCLOSURE**

December 31, 2009

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Integra Bank, National Association  
Charter Number: 12132

21 S.E. Third Street  
Evansville, IN 47705

Office of the Comptroller of the Currency

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St. Louis, MO 63103

**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 **Integra Bank, National Association** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Integra Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		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:

- The geographic distribution of loans among geographies is excellent in the Cincinnati-Middletown, OH-KY-IN MA #17140 and in the state of Illinois. The geographic distribution is good in the state of Indiana and is adequate in the Evansville-Henderson, IN-KY MA #21780 and in the state of Kentucky.
- The distribution of loans among borrowers of different income levels is excellent in the Cincinnati-Middletown, OH-KY-IN MA #17140 and in the states of Indiana and Illinois. The distribution of loans is good in the Evansville-Henderson, IN-KY MA #21780 and in the state of Kentucky.
- Investment activity reflects adequate responsiveness to community needs in the Evansville-Henderson, IN-KY MA #21780 and in the states of Kentucky and Indiana. Investment activity reflects good responsiveness to community needs in the Cincinnati-Middletown, OH-KY-IN MA #17140, but poor responsiveness in the state of Illinois.
- The accessibility of the bank’s delivery systems to geographies and individuals of different income levels is excellent in the Cincinnati-Middletown, OH-KY-IN MA #17140 and in the state of Indiana. The accessibility is good in the Evansville-Henderson, IN-KY MA #21780 and in the state of Illinois. The accessibility is adequate in the state of Kentucky.

## Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Description of Institution

Integra Bank, National Association (Integra) is a community bank headquartered in Evansville, Indiana. Integra is a wholly owned subsidiary of Integra Bank Corporation, a \$2.9 billion bank holding company headquartered in Evansville, Indiana. The company provides a comprehensive range of financial services including commercial and retail banking, trust, brokerage, and insurance. As of December 31, 2009, Integra reported total assets of \$2.9 billion and Tier One Capital of \$195 million.

Integra is a full-service bank offering various loan and deposit products. Integra offers conventional and government-guaranteed home mortgage loans, home improvement loans, consumer loans, and a full range of business and agricultural loans. As of December 31, 2009, net loans represented 81 percent of total assets and consisted of commercial and commercial real estate loans (59 percent), residential real estate loans (28 percent), consumer loans (6 percent), agricultural and agricultural real estate loans (5 percent), and other loans (2 percent).

In April 2007, Integra acquired the Prairie Bank and Trust Company of Bridgeview, Illinois creating a new assessment area (AA) in Cook and Will Counties which is part of the Chicago-Naperville-Joliet, IL MA #16974.

Integra is an interstate bank with 69 branch offices located in Indiana (32), Illinois (12), Kentucky (23), and Ohio (2). There are no legal, financial, or other factors impeding Integra's ability to help meet the credit needs of the communities it serves.

Integra was rated "Satisfactory" at its last CRA evaluation dated September 30, 2005.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for the lending test was January 1, 2005 through September 30, 2009 with the exception of community development (CD) loans. The evaluation period for CD loans, the investment test, and the service test was October 1, 2005 through December 31, 2009.

In January 2009, Integra sold their branches located in Anderson County, Kentucky. In February 2009, Integra sold their branches located in Fayette and Scott Counties, which are part of the Lexington-Fayette, KY MA #30460. In December 2009, Integra sold their branches located in Gallatin and Grant Counties (Kentucky) and closed their branches located in Boone County (Kentucky). Boone, Gallatin, and Grant Counties are part of the Cincinnati-Middletown, OH-KY-IN MA #17140. We did consider Integra's performance in these counties since the bank had a presence in the AAs for most of the evaluation period.

### Data Integrity

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

### Selection of Areas for Full-Scope Review

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

### Ratings

The bank's overall rating is a blend of the multistate metropolitan area ratings and state ratings. We placed the most weight on the Evansville-Henderson, IN-KY MA #21780, followed by the state of Kentucky, the state of Indiana, and the state of Illinois in arriving at the overall bank ratings. The weightings were based upon the total amount of deposits and loans attributed to these areas as a percentage of the entire bank. We placed the least weight on the Cincinnati-Middletown, OH-KY-IN MSA #17140 because this area has the smallest percentage of Integra's deposits and loans that were originated and purchased during the evaluation period.

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

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

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

## Multistate Metropolitan Area Rating

### Evansville-Henderson, IN-KY MA #21780

**CRA rating for the Evansville-Henderson, IN-KY MA #21780<sup>1</sup>: Satisfactory**

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

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

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

The major factors that support this rating include:

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

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

The Evansville-Henderson, IN-KY MA #21780 represents 39 percent (\$968 million) of Integra's total deposits. During the evaluation period, Integra originated and purchased 32 percent, 33 percent, and 15 percent of total home mortgage loans, small loans to businesses, and small loans to farms, respectively, within this AA. Integra has 20 branch offices and 61 automatic teller machines (ATMs) in this AA. Integra is the third largest bank in this AA which is comprised of both metropolitan and rural areas. Integra's primary competition includes Old National Bank, Fifth Third Bank, and Bank of Evansville.

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

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

We determined the community's needs by contacting representatives from a housing organization and three social services organizations. We also reviewed the Department of Housing and Urban Development (HUD) Consolidated Housing and CD Plan for the city of Evansville. HUD Consolidated Housing and CD Plans are comprehensive planning

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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.

documents that identify community needs. See the Market Profile for the Evansville-Henderson, IN-KY MA #21780 in appendix C for further information.

## **LENDING TEST**

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

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

### **Lending Activity**

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

Integra's lending activity is adequate in the Evansville-Henderson, IN-KY MA #21780. During this evaluation period, 61 percent, 32 percent, and 7 percent of the loans originated and purchased in this AA were home mortgage loans, small loans to businesses, and small loans to farms, respectively. Among home mortgage loans, 39 percent, 19 percent, and 42 percent were home purchase, home improvement, and home mortgage refinance loans, respectively. Multifamily loans represented less than 1 percent of total loans in this AA.

Integra's lending activity is adequate given its deposit market share considering the large number of lending competitors operating in this AA. Integra ranks third in terms of deposits among depository institutions, with a 17 percent market share. According to 2008 aggregate HMDA data, Integra is the eighth largest, fourth largest, and seventh largest originator and purchaser of home purchase, home improvement, and home mortgage refinance loans with a 3 percent, 10 percent, and 4 percent market share, respectively. While Integra's market share of home purchase, home improvement, and home mortgage refinance loans is lower than its deposit market share, we considered the performance adequate given the large number of mortgage lenders originating loans within the AA, many of which do not have a deposit taking facility within the AA. Integra ranks tenth and second among all lenders for small loans to businesses and small loans to farms, respectively based on 2008 Aggregate CRA data with a 4 percent and 23 percent market share, respectively. Integra's lending levels are adequate and excellent for small loans to businesses and small loans to farms, respectively. While Integra's market share of small loans to businesses is lower than its deposit market share, we considered their performance adequate given six of the top ten lenders do not have a deposit taking facility within the AA.

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

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

In evaluating the bank's performance, we took into consideration there were substantially more opportunities to lend in moderate-income geographies than low-income geographies since fewer than 2 percent of owner-occupied housing units are located in low-income geographies. There were 1,446 and 17,468 owner-occupied housing units in low- and moderate-income geographies, respectively. Therefore, more weight was placed on the performance in moderate-income geographies.

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

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

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

### **Home Purchase Loans**

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

### **Home Improvement Loans**

The geographic distribution of home improvement loans is adequate. The portion of home improvement loans in low-income geographies was significantly lower than the portion of owner-occupied housing units within those geographies. In 2008, the bank didn't originate or purchase any home improvement loans in low-income geographies. Consequently, Integra showed a 0 percent market share for these geographies. The portion of home improvement loans in moderate-income geographies exceeded the portion of owner-occupied housing units within those geographies. The bank's market share of loans in moderate-income geographies was near the bank's overall market share.

### **Home Mortgage Refinance Loans**

The geographic distribution of home mortgage refinance loans is adequate. The portion of home mortgage refinance loans in low-income geographies was significantly lower than the portion of owner-occupied housing units within those geographies. In 2008, the bank didn't originate or purchase any home mortgage refinance loans in low-income geographies. Consequently, Integra showed a 0 percent market share for these geographies. The portion of home mortgage refinance loans in moderate-income geographies was somewhat lower than the portion of owner-occupied housing units within those geographies. However, the bank's

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

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

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

The geographic distribution of small loans to businesses is excellent. The portion of small loans to businesses in low-income geographies and moderate-income geographies exceeded the portion of businesses within those geographies. The bank's market share of loans in low-income geographies and moderate-income geographies exceeded the bank's overall market share.

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

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

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

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

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

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

The inside/outside ratio analysis was conducted at the bank level. A substantial majority (88 percent) of home mortgage loans originated and purchased by Integra during the evaluation period was within the bank's AAs in Kentucky, Illinois, Indiana, and Ohio. Integra originated and purchased 86 percent, 91 percent, 87 percent, and 50 percent of home purchase, home improvement, home mortgage refinance, and multifamily loans, respectively, within all of its AAs. The bank originated and purchased 86 percent and 89 percent of small loans to businesses and small loans to farms, respectively, within all of its AAs. One hundred percent of CD loans were originated and purchased within the bank's AAs. We gave positive consideration to this record of lending within the AAs when drawing conclusions relative to the overall geographic distribution of lending by income level of geography.

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

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

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

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

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

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

### Home Purchase Loans

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

### Home Improvement Loans

Integra does an excellent job of addressing the low- and moderate-income borrower credit needs for home improvement loans. The portion of home improvement loans to low-income borrowers was somewhat lower than the portion of AA families who are low-income. However, the bank’s market share of loans to low-income borrowers exceeded the bank’s overall market share. The portion of home improvement loans to moderate-income borrowers exceeded the portion of AA families who are moderate-income. The bank’s market share of loans to moderate-income borrowers exceeded the bank’s overall market share.

### Home Mortgage Refinance Loans

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

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

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

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

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

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

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

The borrower distribution of small loans to farms is excellent. The portion of loans extended to farms with revenues of \$1 million or less was near the portion of area farms that have revenue levels of \$1 million or less. However, the bank's market share to the \$1 million or less borrowers exceeded the bank's overall market share.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the "Multistate Metropolitan Area" 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.

Integra's level of CD lending had a neutral impact on the lending test rating. Integra originated one CD loan for \$10 thousand to a non-profit organization that administers a child care and food program to low- and moderate-income individuals.

### **Product Innovation and Flexibility**

Integra uses one non-proprietary affordable mortgage loan program (Hope of Evansville, Inc. Down Payment Assistance Loans) to meet an identified credit need of affordable housing for low- and moderate-income individuals. The use of this affordable mortgage loan program had a neutral impact on the lending test. The flexible loan underwriting criteria includes down payment assistance and more liberal debt-to-income ratios. Integra originated 13 loans totaling \$1 million.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

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

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

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

Integra made \$2 million of qualified investments during the evaluation period, none of which were complex. The qualified investments consisted of:

- mortgage-backed securities of \$418 thousand secured with loans to low- and moderate-income individuals,
- \$1.06 million in CRA Qualified Investment Funds (QIFs), and
- donations totaling \$523 thousand to 53 organizations that had a CD purpose.

The donations include qualified investments in the Senior Housing Crime Prevention Foundation (SHCPF) and the Community Action Program of Evansville as matching funds for Individual Development Accounts (IDAs). Low-income individuals may use IDAs for education, home ownership, or to start a small business. The SHCPF provides crime prevention programs to residents of senior housing facilities who are primarily low- and moderate-income.

A QIF makes investments in qualified securities throughout the nation and can target its purchases to fund projects in each shareholder's (bank's) AA. These investments include individual mortgages to low- and moderate-income individuals, municipal housing bonds, and other mortgage backed securities that assist low- and moderate-income individuals with housing needs.

Integra has low-income housing tax credits, totaling \$620 thousand, from prior evaluation periods that remain outstanding. These tax credits were acquired in 1997 and 1998 for a larger regional area with potential benefit to one or more AAs. These funds and funds from other sources were used to construct and rehabilitate 33 multifamily complexes (1,974 units) in Ohio, Wisconsin, Kentucky, Indiana, and Illinois.

## **SERVICE TEST**

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

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

### **Retail Banking Services**

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

Integra's service delivery systems are accessible to geographies and individuals of different income levels throughout the AA. The percentage of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies. Integra does not have any branches in low-income geographies within this AA. However, less than 3 percent of the AA's population resides in low-income geographies. There were no branch openings or closings in this AA.

Integra's hours and services offered throughout the AA are good. Office hours and services do not vary in a way that inconveniences its AA, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. Banking hours and services are provided Monday through Friday and are supplemented by Saturday hours at 18 of the 20 branch offices in this AA. The two branches that don't have Saturday hours are located in middle-income geographies. There were no material differences in the services offered at the various branch locations.

Integra uses ATMs and online banking as alternative delivery systems for providing retail banking services to low- and moderate-income individuals and in low- and moderate-income geographies. Integra has 25 full service and 36 cash dispense only ATMs located in this AA. The percentage of ATMs in low-income geographies and moderate-income geographies equals and exceeds the percentages of the population residing in these geographies, respectively. There are no full service ATMs in low-income geographies and 8 full service ATMs in moderate-income geographies. Online banking allows customers to retrieve balances, open accounts, transfer funds, print statements, and pay bills online. Although online banking is available to all individuals, data wasn't available on the number of low- and moderate-income individuals who use this alternative delivery system.

### **Community Development Services**

Integra has provided an adequate level of CD services in this AA. Although Integra's CD services have not been innovative, they have met some of the identified community needs. The CD services were primarily related to providing affordable housing and community services to low- and moderate-income individuals. Approximately 45 organizations have

benefited from Integra's participation in providing CD services. Examples of CD services include:

- An Integra employee provided CD services to a non-profit housing corporation that provides safe, affordable, and decent housing for low- and moderate-income individuals. CD services included assisting in preparing and reviewing budgets, formulating strategic plans, and assisting in preparing grant applications.
- An Integra employee provided CD services to a non-profit organization that provides health care to low- and moderate-income individuals who are uninsured or underinsured. CD services included approving annual budgets and monthly financial statements and assisting in fund raising activities.
- An Integra employee provided CD services to a non-profit organization that serves victims of domestic violence who are primarily low- and moderate-income. CD services included approving annual budgets, reviewing monthly financial statements, and assisting in fund raising activities.

## Multistate Metropolitan Area Rating

### Cincinnati-Middletown, OH-KY-IN MA #17140

**CRA rating for the Cincinnati-Middletown, OH-KY-IN MA #17140<sup>2</sup>: Outstanding**

**The lending test is rated: Outstanding**

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

**The service test is rated: Outstanding**

The major factors that support this rating include:

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

### Description of Institution's Operations in Cincinnati-Middletown, OH-KY-IN MA #17140

The Cincinnati-Middletown, OH-KY-IN MA #17140 represents 5 percent (\$113 million) of Integra's total deposits. During the evaluation period, Integra originated and purchased 6 percent, 8 percent, and 8 percent of total home mortgage loans, small loans to businesses, and small loans to farms, respectively, within this AA. Integra has two branch offices and two ATMs in this AA. Integra is the eighth largest bank in this AA which is comprised of both metropolitan and rural areas. Integra's primary competition includes Bank of Kentucky, Inc., Fifth Third Bank, and Heritage Bank, Inc.

Refer to the market profile for the Cincinnati-Middletown, OH-KY-IN MA #17140 in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### Scope of Evaluation in Cincinnati-Middletown, OH-KY-IN MA #17140

We determined the community's needs by contacting representatives from an economic development agency and four housing organizations. See the Market Profile for the Cincinnati-Middletown, OH-KY-IN MA #17140 in appendix C for further information.

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<sup>2</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the Cincinnati-Middletown, OH-KY-IN MA #17140 is rated "Outstanding". Based on the full-scope review, the bank's performance in this AA is excellent.

### Lending Activity

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

Integra's lending activity is adequate in the Cincinnati-Middletown, OH-KY-IN MA #17140. During this evaluation period, 49 percent, 34 percent, and 17 percent of the loans originated and purchased in this AA were home mortgage loans, small loans to businesses, and small loans to farms, respectively. Among home mortgage loans, 26 percent, 29 percent, and 45 percent were home purchase, home improvement, and home mortgage refinance loans, respectively. No multifamily loans were originated or purchased in this AA.

Integra's lending activity is adequate given its deposit market share considering the large number of lending competitors operating in this AA. Integra ranks 8th in terms of deposits among depository institutions, with a 4 percent market share. According to 2008 aggregate HMDA data, Integra is the 41st largest, 2nd largest, and 25th largest originator and purchaser of home purchase, home improvement, and home mortgage refinance loans with a .52 percent, 7 percent, and 1 percent market share, respectively. Integra's lending levels are excellent for home improvement loans. While Integra's market share of home purchase and home mortgage refinance loans is lower than its deposit market share, we considered the performance adequate given the large number of mortgage lenders originating loans within the AA, many of which do not have a deposit taking facility within the AA. Integra ranks 18th and 3rd among all lenders for small loans to businesses and small loans to farms, respectively based on 2008 aggregate CRA data with a 1 percent and 17 percent market share, respectively. Integra's lending levels are adequate and excellent for small loans to businesses and small loans to farms, respectively. While Integra's market share of small loans to businesses is lower than its deposit market share, we considered their performance adequate given six of the top ten lenders do not have a deposit taking facility within the AA.

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

The geographic distribution of Integra's home mortgage loans, small loans to businesses, and small loans to farms in the Cincinnati-Middletown, OH-KY-IN MA #17140 is excellent. No multifamily loans were originated or purchased in this AA. Additionally, there are no low-income geographies in this AA.

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

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

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

#### Home Purchase Loans

The geographic distribution of home purchase loans is excellent. The portion of home purchase loans in moderate-income geographies exceeded the portion of owner-occupied housing units within those geographies. The bank's market share of loans in moderate-income geographies exceeded the bank's overall market share.

#### Home Improvement Loans

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

#### Home Mortgage Refinance Loans

The geographic distribution of home mortgage refinance loans is excellent. The portion of home mortgage refinance loans in moderate-income geographies exceeded the portion of owner-occupied housing units within those geographies. The bank's market share of loans in moderate-income geographies exceeded the bank's overall market share.

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

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

The geographic distribution of small loans to businesses is excellent. The portion of small loans to businesses in moderate-income geographies exceeded the portion of businesses within those geographies. The bank's market share of loans in moderate-income geographies exceeded the bank's overall market share.

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

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

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

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

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

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

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

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

The borrower distribution of home mortgage loans, small loans to businesses, and small loans to farms reflects excellent dispersion among borrowers of different income levels in the Cincinnati-Middletown, OH-KY-IN #17140.

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

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

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

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

### **Home Purchase Loans**

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

### **Home Improvement Loans**

Integra does an excellent job of addressing the low- and moderate-income borrower credit needs for home improvement loans. The portion of home improvement loans to low-income borrowers exceeded the portion of AA families who are low-income. The bank's market share

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

### Home Mortgage Refinance Loans

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

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

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

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

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

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

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

### **Community Development Lending**

Refer to Table 1 Lending Volume in the "Multistate Metropolitan Area" 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.

Integra did not originate any CD loans in this AA.

## **Product Innovation and Flexibility**

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

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Cincinnati-Middletown, OH-KY-IN MA #17140 is rated "High Satisfactory". Based on full-scope review, the bank's performance in this AA is good.

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

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

Integra made \$575 thousand of qualified investments during the evaluation period, none of which were complex. The qualified investments consisted of:

- donations totaling \$14 thousand to 30 organizations that had a CD purpose and
- mortgage-backed securities of \$561 thousand secured with loans to low- and moderate-income individuals.

Integra has two low-income housing tax credits from prior evaluation periods that remain outstanding. Refer to the Evansville-Henderson, IN-KY MA # 21780 section of this evaluation.

## **SERVICE TEST**

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

The bank's performance under the service test in the Cincinnati-Middletown, OH-KY-IN MA #17140 is rated "Outstanding". Based on the full-scope review, the bank's performance in this AA is excellent.

### **Retail Banking Services**

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

Integra's service delivery systems are readily accessible to geographies and individuals of different income levels throughout the AA. The percentage of branches in moderate-income

geographies exceeds the percentage of the population residing in these geographies. There are no low-income geographies in this AA. In this AA, there were two branch closings in a moderate- and a middle-income geography and one branch opening in a middle-income geography. The two branch closings have generally not adversely affected the accessibility of Integra's delivery systems, particularly in moderate-income geographies and to low- and moderate-income individuals.

Integra's hours and services offered throughout the AA are good. Office hours and services do not vary in a way that inconveniences its AA, particularly in moderate-income geographies and to low- and moderate-income individuals. Banking hours and services are provided Monday through Friday and are supplemented by Saturday hours at both branch offices in this AA. There were no material differences in the services offered at the various branch locations.

Integra uses ATMs and online banking as alternative delivery systems for providing retail banking services to low- and moderate-income individuals and in moderate-income geographies. Integra has two full service ATMs located in this AA, both of which are located in moderate-income geographies. The percentage of ATMs in moderate-income geographies exceeds the percentage of the population residing in these geographies. As previously stated, data wasn't available on the number of low- and moderate-income individuals who use online banking as an alternative delivery system.

## **Community Development Services**

Integra has provided an adequate level of CD services in this AA. Although Integra's CD services have not been innovative, they have met some of the identified community needs. The CD services were primarily related to providing community services to low- and moderate-income individuals. Approximately 15 organizations have benefited from Integra's participation in providing CD services. Examples of CD services include:

- An Integra employee provided CD services to a non-profit organization that provides treatment and education programs for child abuse victims and their families, the majority of whom are low- and moderate-income. CD services included conducting training sessions on identity theft and financial related products.
- An Integra employee provided CD services to a non-profit organization that provides income tax preparation assistance to low- and moderate-income individuals. CD services consisted of preparing tax returns for approximately 40 hours.

## State Rating

### State of Kentucky

#### CRA Rating for Kentucky<sup>3</sup>: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: Low Satisfactory

The service test is rated: Low Satisfactory

The major factors that support this rating include:

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

### Description of Institution's Operations in Kentucky

The state of Kentucky represents 19 percent (\$483 million) of Integra's total deposits. During the evaluation period, Integra originated and purchased 29 percent, 25 percent, and 25 percent of its total home mortgage loans, small loans to businesses, and small loans to farms, respectively, within the state of Kentucky. Integra has 18 branch offices and 19 ATMs in Kentucky. Integra currently has four AAs and is the 19th largest bank in the state in relation to deposits. In February 2009, Integra sold their branches located in Fayette and Scott Counties which are part of the Lexington-Fayette, KY MA #30460. We did consider Integra's performance in this AA since the bank had a presence in these counties for most of the evaluation period. Its AAs are comprised of both metropolitan and rural areas. Integra's primary competition includes Franklin Bank and Trust Company, Bank of Cadiz and Trust Company, Old National Bank, and Branch Banking and Trust Company. The AA of the Four Non MA KY Counties (Caldwell, Graves, Hopkins, and Union Counties) has the largest percentage of Integra's deposits within the state. The AA of the Six Non MA KY Counties (Anderson, Breckinridge, Grayson, Mason, Robertson, and Simpson Counties) has the largest percentage of Integra's loans within the state.

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

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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.

## Scope of Evaluation in Kentucky

The Six Non MA KY Counties and the Four Non MA KY Counties are equally significant to the bank within the state. We selected the Six Non MA KY Counties to receive a full-scope review because the other significant AA received a full-scope review at the last CRA Evaluation. The full-scope AA received the most weight in determining the state ratings. The remaining AAs of the Four Non MA KY Counties, Bowling Green, KY MA #14540, Clarksville, TN-KY MA #17300, and Lexington-Fayette, KY MA #30460 received a limited-scope review. Refer to the table in appendix A for additional information on the scope of our review.

The non MA counties weren't combined into one AA because the Four Non MA KY Counties are located in western Kentucky and the remaining counties are not.

We determined the community's needs by contacting representatives from an economic development agency and four housing organizations. See the Market Profile for the Six Non MA KY Counties in appendix C for further information.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

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

In evaluating the bank's lending test performance, we took into consideration there are no low- and moderate- income geographies in two of the five AAs. These two AAs consist of the full-scope AA and the Clarksville, TN-KY MA # 17300. Therefore, no geographic distribution of loans was performed in these AAs. Consequently, more weight was placed on the distribution of loans among borrowers of different income levels in arriving at the overall lending test rating.

### Lending Activity

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

Integra's lending activity is adequate in the Six Non MA KY Counties. During this evaluation period, 60 percent, 18 percent, and 22 percent of the loans originated and purchased in this AA were home mortgage loans, small loans to businesses, and small loans to farms, respectively. Among home mortgage loans, 23 percent, 28 percent, and 49 percent were home purchase, home improvement, and home mortgage refinance loans, respectively. No multifamily loans were originated or purchased in this AA.

Integra's lending activity is adequate given its deposit market share considering the large number of lending competitors operating in this AA. Integra ranks second in terms of deposits among depository institutions, with a 10 percent market share. According to 2008 aggregate HMDA data, Integra is the eighth largest, second largest, and fourth largest originator and purchaser of home purchase, home improvement, and home mortgage refinance loans with a

3 percent, 13 percent, and 5 percent market share, respectively. Integra's lending levels are excellent for home improvement loans. While Integra's market share of home purchase and home mortgage refinance loans is lower than its deposit market share, we considered the performance adequate given the large number of mortgage lenders originating loans within the AA, many of which do not have a deposit taking facility within the AA. Integra ranks tenth and second among all lenders for small loans to businesses and small loans to farms, respectively based on 2008 aggregate CRA data with a 3 percent and 30 percent market share, respectively. Integra's lending levels are adequate and excellent for small loans to businesses and small loans to farms, respectively. While Integra's market share of small loans to businesses is lower than its deposit market share, we considered their performance adequate given four of the top six lenders do not have a deposit taking facility within the AA.

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

There are no low- or moderate-income geographies in the Six Non MA KY Counties; therefore an analysis would not be meaningful.

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

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

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

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

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

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

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

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

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

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

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

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

In the AA, we placed the most weight on the distribution of home mortgage loans and then small loans to farms because they represented the largest percentage of loans originated and purchased within the AA. Within the home mortgage loan category more weight was placed on home mortgage refinance loans followed by home improvement loans.

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

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

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

### **Home Purchase Loans**

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

### **Home Improvement Loans**

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

### **Home Mortgage Refinance Loans**

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

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

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

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

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

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

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

The borrower distribution of small loans to farms is excellent. The portion of loans extended to farms with revenues of \$1 million or less was near the portion of area farms that have revenue levels of \$1 million or less. However, the bank's market share to the \$1 million or less borrowers exceeded the bank's overall market share.

### **Community Development Lending**

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

Integra's level of CD lending had a neutral impact on the lending test rating in the Six Non MA KY Counties. Integra originated four CD loans totaling \$683 thousand within this AA. A summary of these loans is discussed below.

- Integra originated a \$480 thousand loan to a non-profit organization that provides community services to low- and moderate-income individuals. These services include health care, job placement services, and independent living skill training. Loan proceeds were used to complete the construction of a commercial building where these services are provided.
- Integra originated two loans totaling \$200 thousand to a non-profit organization that provides safe, affordable, owner-occupied housing for low-income individuals. Loan proceeds were used to support this entity's operations.

- Integra originated a \$3 thousand loan to a non-profit organization that provides optical exams and eye glasses to low- and moderate-income individuals. Loan proceeds were used for fund raising events.

### **Product Innovation and Flexibility**

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

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

Based on the limited-scope reviews, the bank's performance under the lending test in the Bowling Green, KY MA #14540, Clarksville, TN-KY MA #17300, and Lexington-Fayette, KY MA #30460 is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test in Kentucky. In the Four Non MA KY Counties, the bank's performance is weaker than the bank's overall performance in the state. Refer to the Tables 1 through 12 in the state of Kentucky section of appendix D for the facts and data that support these conclusions.

The weaker performance in the limited-scope Four Non MA KY Counties is attributed to the poor performance in the geographic distribution of loans. The weaker performance didn't lower the level of the bank's overall performance for Kentucky.

## **INVESTMENT TEST**

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

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

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

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

Integra made \$477 thousand of qualified investments during the evaluation period, none of which were complex. The qualified investments consisted of:

- donations totaling \$117 thousand to 37 organizations that had a CD purpose, which includes an investment in SHCPF that provides crime prevention programs to senior housing facilities and
- \$360 thousand in CRA QIFs.

Integra has two low-income housing tax credits from prior evaluation periods that remain outstanding. Refer to Evansville-Henderson, IN-KY MA # 21780 section of this evaluation.

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

Based on the limited-scope reviews, the bank's performance under the investment test in the Four Non MA KY Counties is not inconsistent with the bank's overall "Low Satisfactory" performance under the investment test in Kentucky. In the Bowling Green, KY MA #14540 and Lexington-Fayette, KY MA # 30460, the bank's performance is stronger than the bank's overall performance in the state. In the Clarksville, TN-KY MA #17300, the bank's performance is weaker than the bank's overall performance in the state. Refer to Table 14 in the state of Kentucky section of appendix D for the facts and data that support these conclusions.

The stronger performance in the Bowling Green, KY MA #14540 and Lexington-Fayette, KY MA #30460 is attributed to the good performance in these two AAs versus the adequate performance for the state of Kentucky. The weaker performance in the Clarksville, TN-KY MA #17300 is attributed to the low level of qualified investments in this AA. The weaker performance in the Clarksville, TN-KY MA # 17300 did lower the level of the bank's overall performance for Kentucky.

## **SERVICE TEST**

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

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

### **Retail Banking Services**

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

Integra's service delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the AA. There are no low- or moderate-income geographies in this AA. There were no branch openings or closings in this AA.

Integra's hours and services offered throughout the AA are good. Office hours and services do not vary in a way that inconveniences its AA, particularly to low- and moderate-income individuals. Banking hours and services are provided Monday through Friday and are supplemented by Saturday hours at all branch locations. There were no material differences in the services offered at the various branch locations.

Integra uses ATMs and online banking as alternative delivery systems for providing retail banking services to low- and moderate-income individuals. Integra has four full service and two cash dispense only ATMs located in this AA. As previously stated, data wasn't available on the number of low- and moderate-income individuals who use online banking as an alternative delivery system.

## Community Development Services

Integra has provided an adequate level of CD services in this AA. Although Integra’s CD services have not been innovative, they have met some of the identified community needs. The CD services were primarily related to providing community services to low- and moderate-income individuals. Approximately 15 organizations have benefited from Integra’s participation in providing CD services. Examples of CD services include:

- An Integra employee provided CD services to a non-profit housing authority that provides safe, affordable, and decent housing for low- and moderate-income individuals. CD services consisted of providing financial literacy classes to residents.
- An Integra employee provided CD services to a non-profit organization that provides financial assistance and various community services to needy individuals and families that are primarily low- and moderate-income. CD services included preparing financial reports and teaching budgeting classes to clients of this organization.
- An Integra employee provided CD services to a non-profit organization that operates a food bank for the needy. CD services included preparing financial reports, paying bills, and assisting in preparing grant applications.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the bank’s performance under the service test in the Four Non MA KY Counties, Bowling Green, KY MA #14540, Clarksville, TN-KY MA #17300, and Lexington-Fayette, KY MA #30460 is not inconsistent with the bank’s overall “Low Satisfactory” performance under the service test in Kentucky. Refer to Table 15 in the state of Kentucky section of appendix D for the facts and data that support these conclusions.

## State Rating

### State of Indiana

#### CRA Rating for Indiana<sup>4</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 loans among geographies is good.
- The distribution of loans among borrowers of different income levels is excellent.
- Investment activity reflects an adequate level of responsiveness to identified community needs.
- Integra's service delivery systems are readily accessible to geographies and individuals of different income levels. The bank provides an adequate level of CD services.

### Description of Institution's Operations in Indiana

The state of Indiana represents 19 percent (\$485 million) of Integra's total deposits. During the evaluation period, Integra originated and purchased 22 percent, 23 percent, and 36 percent of its total home mortgage loans, small loans to businesses, and small loans to farms, respectively, within the state of Indiana. Integra has 17 branch offices and 22 ATMs in Indiana. Integra currently has two AAs and is the 17th largest bank in the state in relation to deposits. Its AAs are comprised of mostly rural areas. Integra's primary competition includes Old National Bank, German American Bank, and Fifth Third Bank. The AA of the Seven Non MA IN Counties (Daviess, Dubois, Knox, Lawrence, Orange, Pike, and Spencer Counties) has the largest percentage of Integra's deposits, branches, and loans originated and purchased within the state.

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

### Scope of Evaluation in Indiana

The Seven Non MA IN Counties AA had the largest percentage of deposits, branches, and loans within the state. Consequently, it was selected for a full-scope review and received the most weight in determining the state's ratings. The remaining AA of Ripley County received a

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<sup>4</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.

limited-scope review. The two AAs weren't combined into one AA because they are not geographically in close proximity to each other. Refer to the table in appendix A for additional information on the scope of our review.

We determined the community's needs by contacting representatives from two social service agencies and two housing organizations. See the Market Profile for the Seven Non MSA IN Counties in appendix C for further information.

## **LENDING TEST**

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

The bank's performance under the lending test in Indiana is rated "High Satisfactory". Based on the full-scope review, the bank's performance in the Seven Non MA IN Counties is good.

#### **Lending Activity**

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

Integra's lending activity is adequate in the Seven Non MA IN Counties. During this evaluation period, 51 percent, 28 percent, and 21 percent of the loans originated and purchased in this AA were home mortgage loans, small loans to businesses, and small loans to farms, respectively. Among home mortgage loans, 27 percent, 27 percent, and 46 percent were home purchase, home improvement, and home mortgage refinance loans, respectively. No multifamily loans were originated or purchased in this AA.

Integra's lending activity is adequate given its deposit market share considering the large number of lending competitors operating in this AA. Integra ranks third in terms of deposits among depository institutions, with a 13 percent market share. According to 2008 aggregate HMDA data, Integra is the seventh largest, second largest, and fifth largest originator and purchaser of home purchase, home improvement, and home mortgage refinance loans with a 5 percent, 20 percent, and 5 percent market share, respectively. Integra's lending levels are excellent for home improvement loans. While Integra's market share of home purchase and home mortgage refinance loans is lower than its deposit market share, we considered the performance adequate given the large number of mortgage lenders originating loans within the AA, many of which do not have a deposit taking facility within the AA. Integra ranks ninth and third among all lenders for small loans to businesses and small loans to farms, respectively based on 2008 Aggregate CRA data with a 4 percent and 12 percent market share, respectively. Integra's lending levels are adequate and good for small loans to businesses and small loans to farms, respectively. While Integra's market share of small loans to businesses is lower than its deposit market share, we considered their performance adequate given seven of the top ten lenders do not have a deposit taking facility within the AA.

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

The geographic distribution of Integra's home mortgage loans, small loans to businesses, and small loans to farms in the Seven Non MA IN Counties is good. No multifamily loans were originated or purchased in this AA. There are no low-income geographies in this AA.

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

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

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

#### Home Purchase Loans

The geographic distribution of home purchase loans is excellent. The portion of home purchase loans in moderate-income geographies exceeded the portion of owner-occupied housing units within those geographies. The bank's market share of loans in moderate-income geographies exceeded the bank's overall market share.

#### Home Improvement Loans

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

#### Home Mortgage Refinance Loans

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

### ***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 is excellent. The portion of small loans to businesses in moderate-income geographies exceeded the portion of businesses within those geographies. The bank's market share of loans in moderate-income geographies exceeded the bank's overall market share.

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

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

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

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

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

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

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

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

The borrower distribution of home mortgage loans, small loans to businesses, and small loans to farms reflects excellent dispersion among borrowers of different income levels in the Seven Non MA IN Counties.

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

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

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

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

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

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

### Home Purchase Loans

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

### Home Improvement Loans

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

### Home Mortgage Refinance Loans

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

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

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

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

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

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

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

### **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 multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Integra's level of CD lending had a neutral impact on the lending test rating in the Seven Non MA IN Counties. Integra originated two CD loans totaling \$60 thousand within this AA. A summary of these loans is discussed below.

- Integra originated a \$10 thousand loan to a non-profit organization that provides services to victims of domestic violence. A majority of their clients are low- and moderate-income. Loan proceeds were used to buy a vehicle to assist in this entity's operations.
- Integra originated a \$50 thousand loan to a non-profit organization that provides affordable housing to low- and moderate-income senior citizens. Loan proceeds were used to refinance an existing lien on an 8-unit housing complex.

### **Product Innovation and Flexibility**

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

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

Based on the limited-scope review, the bank's performance under the lending test in Ripley County is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test in Indiana. 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

The bank's performance under the investment test in Indiana is rated "Low Satisfactory". Based on the full-scope review, the bank's performance in the Seven Non MA IN Counties is adequate.

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

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

Integra made \$662 thousand of qualified investments during the evaluation period, none of which were complex. The qualified investments consisted of:

- donations totaling \$26 thousand to 32 organizations that had a CD purpose, which includes an investment in SHCPF that provides crime prevention programs to senior housing facilities,
- mortgage-backed securities of \$57 thousand secured with loans to low- and moderate-income individuals, and
- \$579 thousand in CRA QIFs.

Integra has two low-income housing tax credits from prior evaluation periods that remain outstanding. Refer to Evansville-Henderson, IN-KY MA # 21780 section of this evaluation.

### Conclusions for Area Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the investment test in Ripley County is weaker than the bank's overall "Low Satisfactory" performance under the investment test in Indiana. Refer to Table 14 in the state of Indiana section of appendix D for the facts and data that support these conclusions.

The weaker performance in Ripley County is attributed to the low level of qualified investments in this AA. The weaker performance didn't lower the level of the bank's overall performance for Indiana.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Indiana is rated "Outstanding". Based on the full-scope review, the bank's performance in the Seven Non MA IN Counties is excellent.

## 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.

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

Integra's hours and services offered throughout the AA are good. Office hours and services do not vary in a way that inconveniences its AA, particularly in moderate-income geographies and to low- and moderate-income individuals. Banking hours and services are provided Monday through Friday and are supplemented by Saturday hours at 10 of the 14 branch offices in this AA. The 4 branches that don't have Saturday hours are located in middle-income geographies. There were no material differences in the services offered at the various branch locations.

Integra uses ATMs and online banking as alternative delivery systems for providing retail banking services to low- and moderate-income individuals and in moderate-income geographies. Integra has 13 full service and 6 cash dispense only ATMs located in this AA. Four of the 13 full service ATMs are located in moderate-income geographies. The percentage of ATMs in moderate-income geographies exceeds the percentage of the population residing in these geographies. As previously stated, data wasn't available on the number of low- and moderate-income individuals who use online banking as an alternative delivery system.

## Community Development Services

Integra has provided an adequate level of CD services in this AA. Although Integra's CD services have not been innovative, they have met some of the identified community needs. The CD services were primarily related to providing affordable housing and community services to low- and moderate-income individuals. Approximately 35 organizations have benefited from Integra's participation in providing CD services. Examples of CD services include:

- An Integra employee provided CD services to a non-profit organization that operates a food bank. CD services included preparing and reviewing budgets, assisting in fund raising activities, and preparing grant applications.
- An Integra employee provided CD services to a non-profit housing organization that provides affordable housing to low- and moderate-income individuals. CD services included completing a Federal Home Loan Bank Affordable Housing Program grant application.

- An Integra employee provided CD services to a non-profit organization that provides income tax preparation assistance to low- and moderate-income individuals. CD services consisted of preparing tax returns for approximately 40 hours.

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

There are no low- or moderate-income geographies in Ripley County. Therefore, an analysis would not be meaningful. Refer to Table 15 in the state of Indiana section of Appendix D for the facts and data that support these conclusions.

## State Rating

### State of Illinois

#### CRA Rating for Illinois<sup>5</sup>: Satisfactory

The lending test is rated: Outstanding

The investment test is rated: Needs to Improve

The service test is rated: High Satisfactory

The major factors that support this rating include:

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

### Description of Institution's Operations in Illinois

The state of Illinois represents 18 percent (\$447 million) of Integra's total deposits. During the evaluation period, Integra originated and purchased 11 percent, 12 percent, and 16 percent of its total home mortgage loans, small loans to businesses, and small loans to farms, respectively, within the state of Illinois. Integra has 12 branch offices and 12 ATMs in Illinois. Integra currently has two AAs and is the 103rd largest bank in the state in relation to deposits. Its AAs are comprised of both metropolitan and rural areas. Integra's primary competition includes Banterra Bank, City National Bank of Metropolis, and JP Morgan Chase Bank, N.A. The AA of the Seven Non MA IL Counties (Gallatin, Hardin, Jefferson, Johnson, Massac, Pope, and White Counties) has the largest percentage of Integra's deposits, branches, and loans originated and purchased within the state.

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

### Scope of Evaluation in Illinois

The Seven Non MA IL Counties AA had the largest percentage of deposits, branches, and loans originated and purchased within the state. Consequently, it was selected for a full-scope review and received the most weight in determining the state's overall ratings. The remaining

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<sup>5</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.

AA of the Chicago-Naperville-Joliet, IL MA #16974 received a limited-scope review. Refer to the table in appendix A for additional information on the scope of our review.

We determined the community's needs by contacting representatives from a housing organization and two social service agencies. See the Market Profile for the Seven Non MSA IL Counties in appendix C for further information.

## **LENDING TEST**

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

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

### **Lending Activity**

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

Integra's lending activity is adequate in the Seven Non MA IL Counties. During this evaluation period, 57 percent, 20 percent, and 23 percent of the loans originated and purchased in this AA were home mortgage loans, small loans to businesses, and small loans to farms, respectively. Among home mortgage loans, 24 percent, 37 percent, and 39 percent were home purchase, home improvement, and home mortgage refinance loans, respectively. No multifamily loans were originated or purchased in this AA.

Integra's lending activity is adequate given its deposit market share considering the large number of lending competitors operating in this AA. Integra ranks second in terms of deposits among depository institutions, with a 16 percent market share. According to 2008 aggregate HMDA data, Integra is the sixth largest, largest, and third largest originator and purchaser of home purchase, home improvement, and home mortgage refinance loans with a 6 percent, 36 percent, and 8 percent market share, respectively. Integra's lending levels are excellent for home improvement loans. While Integra's market share of home purchase and home mortgage refinance loans is lower than its deposit market share, we considered the performance adequate given the large number of mortgage lenders originating loans within the AA, many of which do not have a deposit taking facility within the AA. Integra ranks eleventh and first among all lenders for small loans to businesses and small loans to farms, respectively based on 2008 Aggregate CRA data with a 3 percent and 29 percent market share, respectively. Integra's lending levels are adequate and excellent for small loans to businesses and small loans to farms, respectively. While Integra's market share of small loans to businesses is lower than its deposit market share, we considered their performance adequate given eight of the top ten lenders do not have a deposit taking facility within the AA.

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

The geographic distribution of Integra's home mortgage loans, small loans to businesses, and small loans to farms in the Seven Non MA IL Counties is excellent. No multifamily loans were originated or purchased in this AA. There are no low-income geographies in this AA.

In the AA, we placed the most weight on the distribution of home mortgage loans and then small loans to farms because they represented the largest percentage of loans originated and purchased within the AA. Within the home mortgage loan category more weight was placed on home mortgage refinance loans followed by home improvement loans.

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

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

#### Home Purchase Loans

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

#### Home Improvement Loans

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

#### Home Mortgage Refinance Loans

The geographic distribution of home mortgage refinance loans is excellent. The portion of home mortgage refinance loans in moderate-income geographies equaled the portion of owner-occupied housing units within those geographies. However, the bank's market share of loans in moderate-income geographies exceeded the bank's overall market share.

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

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

The geographic distribution of small loans to businesses is excellent. The portion of small loans to businesses in moderate-income geographies exceeded the portion of businesses within those geographies. The bank's market share of loans in moderate-income geographies exceeded the bank's overall market share.

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

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

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

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

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

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

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

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

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

In the AA, we placed the most weight on the distribution of home mortgage loans and then small loans to farms because they represented the largest percentage of loans originated and purchased within the AA. Within the home mortgage loan category more weight was placed on home mortgage refinance loans followed by home improvement loans.

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

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

In evaluating the borrower distribution of home mortgage loans, we considered the percentage of families (10 percent) who live below the poverty level and the barriers this may have on home ownership.

### **Home Purchase Loans**

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

### Home Improvement Loans

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

### Home Mortgage Refinance Loans

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

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

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

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

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

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

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

### **Community Development Lending**

Refer to Table 1 Lending Volume in the state of Illinois section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes

geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Integra's level of CD lending had a neutral impact on the lending test rating in the Seven Non MA IL Counties. Integra originated one CD loan for \$200 thousand to a non-profit organization that provides community services to low- and moderate-income individuals. These services include mental health counseling, a child welfare program, and various services for the disabled. Loan proceeds were used to purchase and refurbish commercial real estate where these services are provided.

### **Product Innovation and Flexibility**

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

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

Based on the limited-scope review, the bank's performance under the lending test in the Chicago-Naperville-Joliet, IL MA #16974 is weaker than the bank's overall "High Satisfactory" performance in the state. Refer to the Tables 1 through 12 in the state of Illinois section of appendix D for the facts and data that support these conclusions.

The weaker performance in the limited-scope AA of Chicago-Naperville-Joliet, IL MA #16974 is attributed to the adequate performance in the geographic and borrower distribution of loans. The weaker performance didn't lower the level of the bank's overall performance for Illinois.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Illinois is rated "Needs to Improve". Based on the full-scope review the bank's performance in the Seven Non MA IL Counties is poor.

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

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

Integra made \$65 thousand of qualified investments during the evaluation period, none of which were complex. The qualified investments consisted of:

- donations totaling \$12 thousand to 14 organizations that had a CD purpose, which includes an investment in Senior Housing Crime Prevention Foundation that provides crime prevention programs to senior housing facilities and

- mortgage-backed securities of \$53 thousand secured with loans to low- and moderate-income individuals.

Integra has two low-income housing tax credits from prior evaluation periods that remain outstanding. Refer to Evansville-Henderson, IN-KY MA # 21780 section of this evaluation.

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

Based on the limited-scope review, the bank's performance under the investment test in the Chicago-Naperville-Joliet, IL MA #16974 is weaker than the bank's overall "Poor" performance in the state. Refer to the Table 14 in the state of Illinois section of appendix D for the facts and data that support these conclusions.

The weaker performance in the Chicago-Naperville-Joliet, IL MA #16974 is attributed to the very low level of qualified investments in this AA. The weaker performance didn't lower the level of the bank's overall performance for Illinois.

## **SERVICE TEST**

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

The bank's performance under the service test in Illinois is rated "High Satisfactory". Based on the full-scope review, the bank's performance in the Seven Non MA IL Counties is excellent.

### **Retail Banking Services**

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

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

Integra's hours and services offered throughout the AA are good. Office hours and services do not vary in a way that inconveniences its AA, particularly in moderate-income geographies and to low- and moderate-income individuals. Banking hours and services are provided Monday through Friday and are supplemented by Saturday hours at all eight branch offices in this AA. Integra uses ATMs and online banking as alternative delivery systems for providing retail banking services to low- and moderate-income individuals and in moderate-income geographies. Integra has eight full service ATMs located in this AA, four of which are located in moderate-income geographies. The percentage of ATMs in moderate-income geographies exceeds the percentage of the population residing in these geographies. As previously stated, data wasn't available on the number of low- and moderate-income individuals who use online banking as an alternative delivery system.

## Community Development Services

Integra has provided an adequate level of CD services in this AA. Although Integra's CD services have not been innovative, they have met some of the identified community needs. The CD services were primarily related to providing community services to low- and moderate-income individuals. Approximately 20 organizations have benefited from Integra's participation in providing CD services. Examples of CD services include:

- An Integra employee provided CD services to a non-profit organization that provides various social services to low- and moderate-income individuals. CD services included assisting with preparing and reviewing budgets, fund raising activities, strategic planning, and marketing.
- An Integra employee provided CD services to a non-profit organization that provides funding to various organizations, the majority of which primarily serve low- and moderate-income individuals. CD services included preparing and reviewing budgets, assisting with fund raising activities, and strategic planning.
- An Integra employee provided CD services to a non-profit organization that provides crisis intervention, counseling services, temporary housing, foster and day care, and job skills training to primarily low- and moderate-income individuals. CD services consisted of preparing and reviewing budgets, strategic planning, and fund raising activities.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the service test in the Chicago-Naperville-Joliet, IL MA #16974 is weaker than the bank's overall "High Satisfactory" performance in the state. Refer to Table 15 in the state of Illinois section of appendix D for the facts and data that support these conclusions.

The weaker performance in the Chicago-Naperville-Joliet, IL MA #16974 is attributed to the fact that Integra doesn't have any branches in low- and moderate-income geographies in which 10 percent and 29 percent of the population resides, respectively. The weaker performance lowered the state of Illinois rating from "Outstanding" to "High Satisfactory".

## 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): 1/1/05 to 9/30/09 Investment and Service Tests and CD Loans: 10/1/05 to 12/31/09	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Integra Bank, N.A. (Integra) Evansville, Indiana	Home mortgage loans, small loans to businesses, small loans to farms, and CD loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Evansville-Henderson, IN-KY MA #21780	Full-Scope	
Cincinnati-Middletown, OH-KY-IN MA #17140 (Only Boone, Gallatin, and Grant Counties KY and Brown County, OH)	Full-Scope	
State of Kentucky Six Non MA KY Counties (Anderson, Breckinridge, Grayson, Mason, Robertson, and Simpson Counties)	Full-Scope	
Four Non MA KY Counties (Caldwell, Graves, Hopkins, And Union Counties)	Limited-Scope	
Bowling Green, KY MA #14540 (Only Warren County)	Limited-Scope	
Clarksville, TN-KY MA #17300 (Only Trigg County, KY)	Limited-Scope	
Lexington-Fayette, KY MA #30460 (Only Fayette and Scott	Limited-Scope	

Counties)		
State of Indiana Seven Non MA IN Counties (Daviess, Dubois, Knox, Lawrence, Orange, Pike, and Spencer Counties)	Full-Scope	
Ripley County	Limited-Scope	
State of Illinois Seven Non MA IL Counties (Gallatin, Hardin, Jefferson, Johnson, Massac, Pope, and White Counties)	Full-Scope	
Chicago-Naperville-Joliet, IL MA #16974	Limited-Scope	

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

RATINGS      INTEGRA BANK, NATIONAL ASSOCIATION.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Integra Bank, National Association	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Evansville-Henderson, IN-KY MA #21780	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Cincinnati-Middletown, OH-KY- IN MA #17140	Outstanding	High Satisfactory	Outstanding	Outstanding
State of Kentucky	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of Indiana	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
State of Illinois	Outstanding	Needs to Improve	High Satisfactory	Satisfactory

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

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

### Evansville-Henderson, IN-KY MA #21780

Demographic Information for Full-Scope Area: Evansville-Henderson, IN-KY MA #21780						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	85	3.53	28.23	48.24	20.00	0.00
Population by Geography	342,815	2.25	22.50	51.69	23.56	0.00
Owner-Occupied Housing by Geography	98,253	1.47	17.78	55.06	25.69	0.00
Businesses by Geography	25,349	1.86	27.47	50.48	20.19	0.00
Farms by Geography	1,326	0.15	10.33	60.63	28.89	0.00
Family Distribution by Income Level	93,388	18.96	18.48	24.07	38.49	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	34,965	3.70	32.12	51.79	12.39	0.00
Median Family Income = \$48,255						
HUD Adjusted Median Family Income for 2009 = \$60,900						
Households Below the Poverty Level = 10%						
			Median Housing Value = \$81,825			
			Unemployment Rate (September 2009) = 7.6%			

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

Source: 2000 U.S. Census, and 2009 HUD updated MFI.

Integra's AA consists of the entire Evansville-Henderson, IN-KY MA #21780, which is located in southwest Indiana and northwest Kentucky. This MA is the eighth largest MA in the states of Indiana and Kentucky. Integra has 20 branch offices, 25 full service ATMs, and 36 cash dispense only ATMs located within the AA. Over the evaluation period, 32 percent of home mortgage loans, 33 percent of small loans to businesses, and 15 percent of small loans to farms were derived from this AA. The bank's primary business focus in the AA is traditional retail banking products.

Integra's deposits in this AA total \$968 million. This represents 39 percent of the bank's total deposits. Integra is the third largest deposit-taking institution in the AA with a 17 percent market share, based on FDIC deposit market share data as of June 30, 2009. Major competitors include Fifth Third Bank, Old National Bank, and Bank of Evansville.

Evansville's recession has deepened, as extended erosion among manufactures has taken its toll. Job losses are pervasive across industries, leaving few stabilizing factors. The typical recession resistant education and health care sectors have not lived up to that billing, slipping modestly over the past year. The large local transportation and utilities sectors have been struggling for over two years. Local home prices hit their steepest rate of decline in late 2008, but extended losses are still affecting homeowners. Residential construction has slowed, helping to right excess supply, but the local housing market remains weak. Major industries

consist of manufacturing, followed by education and health services, and retail trade. Major employers include Toyota Motor Corporation, Deaconess Hospital, St. Mary's Medical Center, Alcoa, and Bristol-Myers Squibb.<sup>6</sup>

In the AA, non-agricultural wage and salaried employment declined from 173,889 in September 2005 to 164,162 in September 2009, a decrease of 6 percent. During this same time period, the unemployment rate increased from 4.8 percent to 7.6 percent. The state of Indiana and state of Kentucky unemployment rates were 9.2 percent and 10.4 percent, respectively, as of September 2009. Henderson County, Kentucky and Warrick County, Indiana, had the highest and lowest unemployment rates in the AA of 9.8 percent and 6.9 percent, respectively. Seven percent of families live below the poverty level in the AA based on 2000 Census Data. It is especially difficult for this segment of the population to afford and maintain a home.

The 2009 HUD adjusted median family income for the AA is \$60,900. Nineteen percent and 18 percent of families are low- and moderate-income, respectively, based on 2000 Census Data. The 2000 median housing value for the AA is \$81,825.

In 2009, the National Low Income Housing Coalition (NLIHC) estimated that between 41 percent and 47 percent of the family area medium income (AMI) was needed to afford the fair market rent for a two bedroom unit. An individual would either need to earn between 170 percent and 183 percent of the federal minimum wage (based on a 40-hour work week) or work a 68- to 73-hour work week to afford the fair market rent between \$624 and \$697.

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

We determined the community's needs by contacting representatives from a housing organization and three social services organizations. We also reviewed the HUD Consolidated Housing and CD Plan for the city of Evansville.

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

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

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<sup>6</sup> Moody's Economy.com, June 2009

- Social services to low- and moderate-income families including child care, health and dental care, affordable in-home care for the elderly, employment and job training, nutrition, and financial literacy services.

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

## Cincinnati-Middletown OH-KY-IN, MA #17140

Demographic Information for Full-Scope Area: Cincinnati-Middletown, OH-KY-IN, MA #17140						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	29	0.00	37.93	41.38	20.69	0.00
Population by Geography	158,530	0.00	33.25	44.40	22.35	0.00
Owner-Occupied Housing by Geography	43,858	0.00	33.76	42.58	23.66	0.00
Businesses by Geography	14,584	0.00	36.14	39.34	24.52	0.00
Farms by Geography	743	0.00	44.28	41.72	14.00	0.00
Family Distribution by Income Level	43,882	20.44	19.28	25.37	34.91	0.00
Distribution of Low- and Moderate- Income Families throughout AA Geographies	17,433	0.00	46.00	43.37	10.63	0.00
Median Family Income HUD Adjusted Median Family Income for 2009 Households Below the Poverty Level	= \$54,771 = \$69,200  = 9%	Median Housing Value  Unemployment Rate (September 2009)				= \$105,773 = 10.0%

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

Source: 2000 U.S. Census, and 2009 HUD updated MFI.

Integra's current AA consists of one county (Brown County, Ohio) of the fifteen counties that comprise the Cincinnati-Middletown, OH-KY-IN MA #17140, which is located in southwest Ohio. In December 2009, Integra sold their branches located in Gallatin County and Grant County, Kentucky and closed their branches located in Boone County, Kentucky. However, we are considering Integra's performance in all four counties since the bank had a presence in these counties for most of the evaluation period. The data contained in the above table is for all four counties. Integra's current AA excludes all three counties (Dearborn, Franklin, and Ohio) in Indiana, seven counties in Kentucky (Boone, Bracken, Campbell, Gallatin, Grant, Kenton, and Pendleton) and four counties in Ohio (Butler, Clermont, Hamilton, and Warren) because it doesn't have any branches located in these counties. This MA is the largest MA in the states of Indiana, Kentucky, and Ohio. Integra currently has two branch offices and two full service ATMs located in Brown County. Over the evaluation period, 6 percent of home mortgage loans, 8 percent of small loans to businesses, and 8 percent of small loans to farms were derived from this AA. The bank's primary business focus in the AA is traditional retail banking products.

Integra's deposits in this AA total \$113 million. This represents 5 percent of the bank's total deposits. Integra is the eighth largest deposit-taking institution in the AA with a 4 percent market share, based on FDIC deposit market share data as of June 30, 2009. Major competitors include Bank of Kentucky, Inc., Fifth Third Bank, and Heritage Bank, Inc.

The recession maintained its hold over the Cincinnati economy in 2009 as persistent layoffs plagued every sector of the economy. Despite a handful of jobs added by healthcare and education, the private services sector is rapidly contracting. Job losses in manufacturing have

accelerated and industrial production is at its lowest level of the decade. The ongoing correction in the housing market is weighing on related employment, particularly in construction. Precipitous declines in home prices in early 2009 are generating negative wealth effects. Major industries consist of professional and business services, followed by education and health services, and government. Major employers include Kroger Company, University of Cincinnati, The Procter and Gamble Company, and Cincinnati Children's Hospital Medical Center.<sup>7</sup>

In the AA, non-agricultural wage and salaried employment declined from 94,076 in September 2005 to 90,747 in September 2009, a decrease of 4 percent. During this same time period, the unemployment rate increased from 5.2 percent to 10.0 percent. The state of Ohio and state of Kentucky unemployment rates were 9.7 percent and 10.4 percent, respectively, as of September 2009. Brown County, Ohio and Boone County, Kentucky had the highest and lowest unemployment rates in the AA of 11.9 percent and 9.2 percent, respectively. Seven percent of families live below the poverty level in the AA based on 2000 Census Data. It is especially difficult for this segment of the population to afford and maintain a home.

The 2009 HUD adjusted median family income for the AA is \$69,200. Twenty percent and 19 percent of families are low- and moderate-income, respectively, based on 2000 Census Data. The 2000 median housing value for the AA is \$105,733.

In 2009, the NLIHC estimated that between 42 percent and 51 percent of the family AMI was needed to afford the fair market rent for a two bedroom unit. An individual would either need to earn between 159 percent and 215 percent of the federal minimum wage (based on a 40-hour work week) or work a 64- to 86-hour work week to afford the fair market rent between \$604 and \$733.

Included in this AA are designated Enterprise Zones located in Mt. Orab, Eagle Township, and the Village of Aberdeen in Brown County, Ohio. Many programs exist through various tax incentives to facilitate investment in the zone, improve the quality of housing, and implement CD projects that support quality jobs and strong neighborhoods.

We determined the community's needs by contacting representatives from an economic development agency and four housing organizations.

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

- Affordable owner-occupied and rental housing for low- and moderate-income individuals.
- Affordable rehabilitation home loans.
- Foreclosure prevention counseling and services.
- Micro small business loans.
- Financial literacy courses.
- Social services to low- and moderate-income individuals including health and dental care, employment and job training, and subsidized public transportation.

We determined the opportunities to make CD loans and provide CD services within the AA are moderate. The AA has housing and social service agencies that provide services to low- and

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<sup>7</sup> Moody's Economy.com, June 2009

moderate-income individuals. Additionally, there are agencies that are involved in economic and business development. The opportunity to make qualified investments other than donations does exist, but is limited. These opportunities include low-income housing tax credits, CRA QIFs, and mortgage-backed securities for affordable housing for a larger statewide or regional area that includes Integra's AA. Competition for CD loans, qualified investments, and CD services is moderate to high and consists primarily of local financial institutions that have a presence within the AA.

## State of Kentucky

**Six Non MA KY Counties (Anderson, Breckinridge, Grayson, Mason, Robertson, and Simpson Counties)**

Demographic Information for Full-Scope Area: Six Non MA KY Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	26	0.00	0.00	65.38	34.62	0.00
Population by Geography	97,283	0.00	0.00	60.87	39.13	0.00
Owner-Occupied Housing by Geography	29,153	0.00	0.00	61.58	38.42	0.00
Businesses by Geography	9,439	0.00	0.00	60.54	39.46	0.00
Farms by Geography	653	0.00	0.00	66.77	33.23	0.00
Family Distribution by Income Level	27,903	15.28	14.34	20.27	50.11	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	8,264	0.00	0.00	72.63	27.37	0.00
Median Family Income = \$32,884		Median Housing Value =				
HUD Adjusted Median Family Income for 2009 = \$42,300		Unemployment Rate (September 2009) =				
Households Below the Poverty Level = 15%						

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

Source: 2000 U.S. Census, and 2009 HUD updated MFI.

Integra's current AA consists of five non-MA counties (Breckinridge, Grayson, Mason, Robertson, and Simpson Counties) dispersed among the eastern two-thirds of the state of Kentucky. In January 2009, Integra sold their branches in Anderson County. However, we are considering Integra's performance in this county since the bank had a presence in Anderson County for most of the evaluation period. The data contained in the above table includes Anderson County. The AA's population represents 2 percent of the state's total population. Integra has five branch offices, four full service ATMs, and two cash dispense only ATMs located within the AA. Over the evaluation period, 11 percent of home mortgage loans, 7 percent of small loans to businesses, and 16 percent of small loans to farms were derived from this AA. The bank's primary business focus in the AA is traditional retail banking products.

Integra's deposits in this AA total \$123 million. This represents 5 percent of the bank's total deposits. Integra is the second largest deposit taking institution in the AA with a 10 percent market share, based on FDIC deposit market share data as of June 30, 2009. Major competitors include Franklin Bank and Trust Company, First State Bank, and US Bank, N.A.

Major industries in the AA consist of services, followed by retail trade, and construction. In the AA, non-agricultural wage and salaried employment declined from 46,550 in September 2005 to 45,471 in September 2009, a decline of 2 percent. During this same time period, the unemployment rate increased from 6.3 percent to 12.5 percent. The state of Kentucky's unemployment rate was 10.4 percent as of September 2009. Grayson County and Robertson

County had the highest and lowest unemployment rates in the AA of 16.4 percent and 9.6 percent, respectively. Eleven percent of families live below the poverty level in the AA, based on 2000 Census Data. It is especially difficult for this segment of the population to afford and maintain a home.

The 2009 HUD adjusted statewide non-MA median family income for the AA is \$42,300. Fifteen percent and 14 percent of families are low- and moderate-income, respectively, based on 2000 Census Data. The 2000 median housing value for the AA is \$72,036.

In 2009, the NLIHC estimated that between 43 percent and 51 percent of the family AMI was needed to afford the fair market rent for a two bedroom unit. An individual would either need to earn between 148 percent and 205 percent of the federal minimum wage (based on a 40-hour work week) or work a 59- to 82-hour work week to afford the fair market rent between \$504 and \$697.

We determined the community's needs by contacting representatives of an economic development agency and four housing organizations.

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

- Energy assistance grants for low-income families.
- Emergency housing assistance grants.
- Foreclosure prevention counseling and services.
- Public transportation.
- Job readiness programs.
- Financial literacy courses.
- Development of new affordable owner-occupied housing through the use of low-income housing tax credits.
- Affordable housing.

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

## State of Indiana

**Seven Non MA IN Counties (Daviess, Dubois, Knox, Lawrence, Orange, Pike, and Spencer Counties)**

Demographic Information for Full-Scope Area: Seven Non MA IN Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	49	0.00	20.41	73.47	6.12	0.00
Population by Geography	207,206	0.00	16.45	76.05	7.50	0.00
Owner-Occupied Housing by Geography	62,059	0.00	13.97	78.46	7.57	0.00
Businesses by Geography	14,864	0.00	19.54	70.33	10.13	0.00
Farms by Geography	1,527	0.00	5.57	82.51	11.92	0.00
Family Distribution by Income Level	56,789	18.18	20.12	25.06	36.64	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	21,752	0.00	21.23	74.27	4.50	0.00
Median Family Income = \$45,666						
HUD Adjusted Median Family Income for 2009 = \$55,500						
Households Below the Poverty Level = 11%						
			Median Housing Value = \$74,677			
			Unemployment Rate (September 2009) = 8.1%			

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

Source: 2000 U.S. Census, and 2009 HUD updated MFI.

Integra's AA consists of seven non-MA counties (Daviess, Dubois, Knox, Lawrence, Orange, Pike, and Spencer Counties) located in southwestern Indiana. The AA's population represents 3 percent of the state's total population. Integra has 14 branch offices, 13 full service ATMs, and 6 cash dispense only ATMs located within the AA. Over the evaluation period, 19 percent of home mortgage loans, 21 percent of small loans to businesses, and 30 percent of small loans to farms were derived from this AA. The bank's primary business focus in the AA is traditional retail banking products.

Integra's deposits in this AA total \$431 million. This represents 17 percent of the bank's total deposits. Integra is the third largest deposit taking institution in the AA with a 13 percent market share, based on FDIC deposit market share data as of June 30, 2009. Major competitors include Old National Bank, German American Bank, and Regions Bank.

Major industries in the AA consist of services, followed by retail trade, and agriculture – forestry – fishing. In the AA, non-agricultural wage and salaried employment declined from 100,402 in September 2005 to 93,939 in September 2009, a decline of 6 percent. During this same time period, the unemployment rate increased from 5.0 percent to 8.1 percent. The state of Indiana's unemployment rate was 9.2 percent as of September 2009. Lawrence County and Daviess County had the highest and lowest unemployment rates in the AA of 11.1 percent and 4.9 percent, respectively. Seven percent of families live below the poverty level in

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

The 2009 HUD adjusted statewide non-MA median family income for the AA is \$55,500. Eighteen percent and 20 percent of families are low- and moderate-income, respectively, based on 2000 Census Data. The 2000 median housing value for the AA is \$74,677.

In 2009, the NLIHC estimated that between 36 percent and 49 percent of the family AMI was needed to afford the fair market rent for a two bedroom unit. An individual would either need to earn between 169 percent and 188 percent of the federal minimum wage (based on a 40-hour work week) or work a 68- to 75-hour work week to afford the fair market rent between \$577 and \$641.

We determined the community's needs by contacting representatives from two social service agencies and two housing agencies.

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

- Affordable owner-occupied housing through the use of low-income housing tax credits.
- Affordable rehabilitation financing.
- Home improvement grants for low-income homeowners on fixed incomes.
- Homeownership and financial literacy counseling.
- Subsidized health insurance and prescription drugs.

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

## State of Illinois

**Seven Non MA IL Counties (Gallatin, Hardin, Jefferson, Johnson, Massac, Pope, and White Counties)**

Demographic Information for Full-Scope Area: Seven Non MA IL Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	30	0.00	30.00	66.67	3.33	0.00
Population by Geography	99,113	0.00	23.42	73.19	3.39	0.00
Owner-Occupied Housing by Geography	30,266	0.00	22.79	73.51	3.70	0.00
Businesses by Geography	7,219	0.00	25.45	70.25	4.30	0.00
Farms by Geography	650	0.00	11.08	87.69	1.23	0.00
Family Distribution by Income Level	26,731	22.33	21.19	23.65	32.83	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	11,631	0.00	31.21	66.79	2.00	0.00
Median Family Income HUD Adjusted Median Family Income for 2009 Households Below the Poverty Level	= \$43,613 = \$54,400 = 14%	Median Housing Value Unemployment Rate				= \$54,816 = 9.7%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 U.S. Census, and 2009 HUD updated MFI.

Integra's AA consists of seven non-MA counties (Gallatin, Hardin, Jefferson, Johnson, Massac, Pope, and White Counties) located in southern Illinois. The AA's population represents 1 percent of the state's total population. Integra has eight branch offices and eight full service ATMs located within the AA. Over the evaluation period, 10 percent of home mortgage loans, 7 percent of small loans to businesses, and 18 percent of small loans to farms were derived from this AA. The bank's primary business focus in the AA is traditional retail banking products.

Integra's deposits in this AA total \$244 million. This represents 10 percent of the bank's total deposits. Integra is the second largest deposit taking institution in the AA with a 16 percent market share, based on FDIC deposit market share data as of June 30, 2009. Major competitors include Banterra Bank, City National Bank of Metropolis, and First National Bank of Carmi.

Major industries in the AA consist of services, followed by retail trade, and agriculture – forestry – fishing. In the AA, non-agricultural wage and salaried employment declined from 45,117 in September 2005 to 41,997 in September 2009, a decline of 7 percent. During this same time period, the unemployment rate increased from 5.3 percent to 9.7 percent. The state of Illinois unemployment rate was 10.2 percent as of September 2009. Hardin County and Massac County had the highest and lowest unemployment rates in the AA of 12.8 percent and 8.0 percent, respectively. Ten percent of families live below the poverty level in the AA,

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

The 2009 HUD adjusted statewide non-MA median family income for the AA is \$54,400. Twenty-two percent and 21 percent of families are low- and moderate-income, respectively, based on 2000 Census Data. The 2000 median housing value for the AA is \$54,816.

In 2009, the NLIHC estimated that between 45 percent and 55 percent of the family AMI was needed to afford the fair market rent for a two bedroom unit. An individual would either need to earn between 135 percent and 142 percent of the federal minimum wage (based on a 40-hour work week) or work a 54- to 57-hour work week to afford the fair market rent between \$546 and \$571.

We determined the community's needs by contacting representatives from a housing organization and two social services agencies.

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

- Down payment assistance for first time low- and moderate-income home buyers.
- Grants to operate emergency shelters.
- Homeownership counseling.
- Small business loans for businesses that don't qualify for traditional bank loans.

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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: IL-IN-KY-OH				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2009						
Assessment Area (2009):	% 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>Multistate MA:</b>												
Evansville-Henderson, IN-KY MA #21780 (FS)	100.00	2,480	211,979	1,271	150,465	292	24,998	1	10	4,044	387,452	100.00
Cincinnati-Middletown, OH-KY-IN MA #17140 (FS)	100.00	432	32,017	302	22,466	150	4,501	0	0	884	58,984	100.00
<b>State of Kentucky:</b>												
Six Non MA KY Counties (F)	37.47	841	49,514	259	10,231	303	9,873	4	683	1,407	70,301	25.46
Four Non MA KY Counties	32.01	726	37,717	335	28,081	140	10,472	1	100	1,202	76,370	41.20
Bowling Green, KY MA #14 (LS)	17.58	407	39,177	240	18,729	13	1,089	0	0	660	58,995	19.05
Clarksville, TN-KY MA #173 (LS)	9.27	234	13,068	85	3,523	29	1,861	0	0	348	18,452	14.29
Lexington-Fayette, KY MA #30460 (LS)	3.67	90	11,204	47	6,652	1	27	0	0	138	17,883	0.00
<b>State of Indiana:</b>												
Seven Non MA IN Counties	85.58	1,445	81,195	800	58,833	577	51,873	2	60	2,824	191,961	88.87
Ripley County (LS)	14.42	281	20,617	80	3,216	115	8,534	0	0	476	32,367	11.13
<b>State of Illinois:</b>												
Seven Non MA IL Counties	83.10	779	33,195	274	17,921	308	23,377	1	200	1,362	74,693	54.59
Chicago-Naperville-Joliet, IL MA #16974 (LS)	16.90	85	12,299	187	29,208	2	135	3	451	277	42,093	45.41

\* 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 October 01, 2005 to December 31, 2009.

\*\*\* 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: IL-IN-KY-OH				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 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>Multistate MA:</b>																
Evansville-Henderson, IN-KY MA #21780 (FS)	959	100.00	1.47	0.83	17.78	10.74	55.06	48.28	25.69	40.15	3.45	3.85	2.52	3.47	3.81	
Cincinnati-Middletown, OH-KY-IN MA #17140 (FS)	110	100.00	0.00	0.00	33.76	72.73	42.58	17.27	23.66	10.00	0.52	0.00	2.09	0.14	0.28	
<b>State of Kentucky:</b>																
Six Non MA KY Counties (FS)	198	33.28	0.00	0.00	0.00	0.00	61.58	62.63	38.42	37.37	3.42	0.00	0.00	4.81	1.80	
Four Non MA KY Counties (LS)	210	35.29	0.00	0.00	2.30	2.38	48.84	48.10	48.86	49.52	3.26	0.00	5.56	2.76	3.63	
Bowling Green, KY MA #14540 (LS)	122	20.50	0.00	0.00	9.66	12.30	54.60	46.72	35.74	40.98	0.95	0.00	1.09	0.78	1.12	
Clarksville, TN-KY MA #17300 (LS)	31	5.21	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	2.71	0.00	0.00	2.71	0.00	
Lexington-Fayette, KY MA #30460 (LS)	34	5.72	3.92	5.88	15.32	26.47	42.49	35.29	38.27	32.36	0.16	0.00	0.68	0.10	0.09	
<b>State of Indiana:</b>																
Seven Non MA IN Counties (FS)	389	86.44	0.00	0.00	13.97	15.42	78.46	81.75	7.57	2.83	4.60	0.00	4.80	4.99	0.64	
Ripley County (LS)	61	13.56	0.00	0.00	0.00	0.00	84.15	100.00	15.85	0.00	3.85	0.00	0.00	5.18	0.00	
<b>State of Illinois:</b>																
Seven Non MA IL Counties (FS)	184	93.88	0.00	0.00	22.79	20.65	73.51	70.65	3.70	8.70	5.56	0.00	5.93	5.54	5.00	

\* Based on 2008 Peer Mortgage Data (Eastern & Western)

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

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

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

Chicago-Naperville-Joliet, IL MA #16974 (LS)	12	6.12	3.53	8.33	19.51	0.00	46.67	33.33	30.29	58.34	0.00	0.00	0.00	0.01	0.01
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**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: IL-IN-KY-OH				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
<b>Multistate MA:</b>																
Evansville-Henderson, IN-KY MA #21780 (FS)	464	100.00	1.47	0.43	17.78	19.61	55.06	58.19	25.69	21.77	9.84	0.00	9.63	11.43	7.29	
Cincinnati-Middletown, OH-KY-IN MA #17140 (FS)	126	100.00	0.00	0.00	33.76	84.13	42.58	11.90	23.66	3.97	7.34	0.00	17.17	3.13	3.00	
<b>State of Kentucky:</b>																
Six Non MA KY Counties (FS)	233	38.01	0.00	0.00	0.00	0.00	61.58	60.09	38.42	39.91	13.46	0.00	0.00	14.44	12.14	
Four Non MA KY Counties (LS)	202	32.94	0.00	0.00	2.30	0.50	48.84	67.82	48.86	31.68	15.28	0.00	14.29	19.08	10.85	
Bowling Green, KY MA #14540 (LS)	71	11.58	0.00	0.00	9.66	12.68	54.60	42.25	35.74	45.07	7.11	0.00	15.00	4.55	7.87	
Clarksville, TN-KY MA #17300 (LS)	89	14.52	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	34.62	0.00	0.00	34.62	0.00	
Lexington-Fayette, KY MA #30460 (LS)	18	2.95	3.92	0.00	15.32	11.11	42.49	44.44	38.27	44.45	0.88	0.00	0.91	0.39	1.39	
<b>State of Indiana:</b>																
Seven Non MA IN Counties (FS)	388	84.35	0.00	0.00	13.97	13.92	78.46	85.05	7.57	1.03	20.00	0.00	6.56	23.39	7.14	
Ripley County (LS)	72	15.65	0.00	0.00	0.00	0.00	84.15	100.00	15.85	0.00	22.22	0.00	0.00	26.09	0.00	
<b>State of Illinois:</b>																
Seven Non MA IL Counties (FS)	289	93.83	0.00	0.00	22.79	30.10	73.51	68.51	3.70	1.39	36.41	0.00	53.19	31.34	0.00	

\* Based on 2008 Peer Mortgage Data (Eastern & Western)

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

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

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

Chicago-Naperville- Joliet IL MA #16974 (LS)	19	6.17	3.53	0.00	19.51	5.26	46.67	63.16	30.29	31.58	0.05	0.00	0.05	0.06	0.05
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**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: IL-IN-KY-OH				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total*	% Owner Occ Units**	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
<b>Multistate MA:</b>																
Evansville-Henderson, IN-KY MA #21780 (FS)	1,056	100.00	1.47	0.19	17.78	12.69	55.06	52.46	25.69	34.66	3.62	0.00	3.40	3.42	4.11	
Cincinnati-Middletown, OH-KY-IN MA #17140 (FS)	196	100.00	0.00	0.00	33.76	76.02	42.58	20.41	23.66	3.57	0.99	0.00	2.67	0.72	0.08	
<b>State of Kentucky:</b>																
Six Non MA KY Counties (FS)	410	37.65	0.00	0.00	0.00	0.00	61.58	57.56	38.42	42.44	5.36	0.00	0.00	7.09	3.64	
Four Non MA KY Counties (LS)	314	28.83	0.00	0.00	2.30	0.64	48.84	49.68	48.86	49.68	7.80	0.00	3.70	8.97	7.11	
Bowling Green, KY MA #14540 (LS)	213	19.56	0.00	0.00	9.66	9.39	54.60	46.01	35.74	44.60	3.37	0.00	5.10	3.69	2.72	
Clarksville, TN-KY MA #17300 (LS)	114	10.47	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	8.14	0.00	0.00	8.14	0.00	
Lexington-Fayette, KY MA #30460 (LS)	38	3.49	3.92	0.00	15.32	7.89	42.49	13.16	38.27	78.95	0.12	0.00	0.00	0.09	0.17	
<b>State of Indiana:</b>																
Seven Non MA IN Counties (FS)	668	81.96	0.00	0.00	13.97	13.02	78.46	84.13	7.57	2.85	5.32	0.00	5.85	5.56	2.27	
Ripley County (LS)	147	18.04	0.00	0.00	0.00	0.00	84.15	99.32	15.85	0.68	6.59	0.00	0.00	8.38	0.00	
<b>State of Illinois:</b>																

\* Based on 2008 Peer Mortgage Data (Eastern & Western)

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

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

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

Seven Non MA IL Counties (FS)	306	85.00	0.00	0.00	22.79	22.88	73.51	72.55	3.70	4.57	8.34	0.00	9.01	8.14	9.52
Chicago-Naperville-Joliet IL MA #16974 (LS)	54	15.00	3.53	0.00	19.51	0.00	46.67	46.30	30.29	53.70	0.01	0.00	0.00	0.02	0.02

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

Geographic Distribution: MULTIFAMILY			Geography: IL-IN-KY-OH				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa II	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Multistate MA:</b>																
Evansville-Henderson, IN-KY MA #21780 (FS)	1	100.00	2.53	0.00	42.50	0.00	45.36	100.00	9.61	0.00	0.00	0.00	0.00	0.00	0.00	
Cincinnati-Middletown, OH-KY-IN MA #17140 (FS)	0	0.00	0.00	0.00	25.24	0.00	53.14	0.00	21.62	0.00	0.00	0.00	0.00	0.00	0.00	
<b>State of Kentucky:</b>																
Six Non MA KY Counties (FS)	0	0.00	0.00	0.00	0.00	0.00	64.25	0.00	35.75	0.00	0.00	0.00	0.00	0.00	0.00	
Four Non MA KY Counties (LS)	0	0.00	0.00	0.00	11.55	0.00	50.51	0.00	37.94	0.00	0.00	0.00	0.00	0.00	0.00	
Bowling Green, KY MA #14540 (LS)	1	100.00	0.00	0.00	41.81	100.00	47.25	0.00	10.94	0.00	0.00	0.00	0.00	0.00	0.00	
Clarksville, TN-KY MA #17300 (LS)	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	
Lexington-Fayette, KY MA #30460 (LS)	0	0.00	18.13	0.00	22.09	0.00	40.79	0.00	18.99	0.00	0.00	0.00	0.00	0.00	0.00	
<b>State of Indiana:</b>																
Seven Non MA IN Counties (FS)	0	0.00	0.00	0.00	31.81	0.00	62.64	0.00	5.55	0.00	0.00	0.00	0.00	0.00	0.00	
Ripley County (LS)	1	100.00	0.00	0.00	0.00	0.00	68.60	100.00	31.40	0.00	0.00	0.00	0.00	0.00	0.00	
<b>State of Illinois:</b>																
Seven Non MA IL Counties (FS)	0	0.00	0.00	0.00	20.12	0.00	72.81	0.00	7.07	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2008 Peer Mortgage Data (Eastern & Western)  
 \*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.  
 \*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.  
 \*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Chicago-Naperville- Joliet IL MA #16974 (LS)	0	0.00	13.43	0.00	27.34	0.00	33.39	0.00	25.84	0.00	0.00	0.00	0.00	0.00	0.00
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**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES				Geography: IL-IN-KY-OH				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 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 Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Multistate MA:</b>															
Evansville-Henderson, IN-KY MA #21780 (FS)	1,271	100.00	1.86	2.20	27.47	32.57	50.48	45.71	20.19	19.52	3.57	9.18	4.26	3.70	2.84
Cincinnati-Middletown, OH-KY-IN MA #17140 (FS)	302	100.00	0.00	0.00	36.14	65.56	39.34	28.15	24.52	6.29	1.09	0.00	2.42	0.82	0.23
<b>State of Kentucky:</b>															
Six Non MA KY Counties (FS)	259	26.81	0.00	0.00	0.00	0.00	60.54	50.97	39.46	49.03	2.56	0.00	0.00	2.86	2.50
Four Non MA KY Counties (LS)	335	34.68	0.00	0.00	5.38	2.39	50.28	46.57	44.34	51.04	3.72	0.00	1.69	4.20	3.90
Bowling Green, KY MA #14540 (LS)	240	24.84	0.00	0.00	21.45	24.17	52.52	45.00	26.01	30.83	1.07	0.00	0.88	1.38	0.86
Clarksville, TN-KY MA #17300 (LS)	85	8.80	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	7.37	0.00	0.00	8.57	0.00
Lexington-Fayette, KY MA #30460 (LS)	47	4.87	13.24	17.02	15.47	21.28	34.25	17.02	36.81	44.68	0.06	0.08	0.14	0.03	0.06
<b>State of Indiana:</b>															
Seven Non MA IN Counties (FS)	800	90.91	0.00	0.00	19.54	21.00	70.33	76.75	10.13	2.25	3.91	0.00	4.13	4.86	0.49
Ripley County (LS)	80	9.09	0.00	0.00	0.00	0.00	79.65	88.75	20.35	11.25	0.77	0.00	0.00	0.73	1.64
<b>State of Illinois:</b>															
Seven Non MA IL Counties (FS)	274	59.44	0.00	0.00	25.45	47.08	70.25	46.35	4.30	6.57	3.13	0.00	7.69	2.19	3.33

\* 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 (2009).

Chicago-Naperville- Joliet IL MA #16974 (LS)	187	40.56	5.21	5.88	18.44	9.09	37.10	52.41	38.85	32.62	0.03	0.06	0.02	0.05	0.02
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**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: IL-IN-KY-OH				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans						
<b>Multistate MA:</b>																
Evansville-Henderson, IN-KY MA #21780 (FS)	292	100.00	0.15	0.00	10.33	2.74	60.63	83.56	28.89	13.70	22.54	0.00	6.25	27.95	9.23	
Cincinnati-Middletown, OH-KY-IN MA #17140 (FS)	150	100.00	0.00	0.00	44.28	72.67	41.72	27.33	14.00	0.00	17.07	0.00	20.75	16.67	0.00	
<b>State of Kentucky:</b>																
Six Non MA KY Counties (FS)	303	62.35	0.00	0.00	0.00	0.00	66.77	85.15	33.23	14.85	29.84	0.00	0.00	36.03	15.69	
Four Non MA KY Counties (LS)	140	28.80	0.00	0.00	0.56	0.00	38.90	32.14	60.54	67.86	13.74	0.00	0.00	19.30	11.67	
Bowling Green, KY MA #14540 (LS)	13	2.67	0.00	0.00	7.00	0.00	55.18	23.08	37.82	76.92	5.88	0.00	0.00	0.00	14.29	
Clarksville, TN-KY MA #17300 (LS)	29	5.97	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	50.00	0.00	0.00	54.55	0.00	
Lexington-Fayette, KY MA #30460 (LS)	1	0.21	5.62	0.00	8.69	0.00	37.31	0.00	48.38	100.00	0.00	0.00	0.00	0.00	0.00	
<b>State of Indiana:</b>																
Seven Non MA IN Counties (FS)	572	83.38	0.00	0.00	5.57	7.69	82.51	89.51	11.92	2.80	11.57	0.00	15.79	12.55	2.44	
Ripley County (LS)	114	16.62	0.00	0.00	0.00	0.00	90.94	100.00	9.06	0.00	54.72	0.00	0.00	56.86	0.00	
<b>State of Illinois:</b>																
Seven Non MA IL Counties (FS)	308	99.35	0.00	0.00	11.08	17.53	87.69	82.14	1.23	0.33	29.24	0.00	50.00	28.39	0.00	
Chicago-Naperville-Joliet IL MA #16974 (LS)	2	0.65	2.51	0.00	14.12	50.00	45.09	0.00	38.28	50.00	0.14	0.00	0.00	0.00	0.32	

\* 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 (2009).



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

Borrower Distribution: HOME PURCHASE		Geography: IL-IN-KY-OH						Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 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****	Overall	Low	Mod	Mid	Upp
<b>Multistate MA:</b>															
Evansville-Henderson, IN-KY MA #21780 (FS)	959	100.00	18.96	14.29	18.48	26.64	24.07	24.38	38.49	34.69	4.12	2.77	4.24	3.25	5.35
Cincinnati-Middletown, OH-KY-IN MA #17140 (FS)	110	100.00	20.44	17.65	19.28	33.33	25.37	23.53	34.91	25.49	0.56	1.14	0.74	0.58	0.19
<b>State of Kentucky:</b>															
Six Non MA KY Counties (FS)	198	33.28	15.28	5.13	14.34	21.54	20.27	31.79	50.11	41.54	3.86	3.03	8.63	3.09	3.04
Four Non MA KY Counties (LS)	210	35.29	17.70	8.21	15.11	18.36	19.44	19.81	47.75	53.62	3.65	4.26	2.07	1.44	5.45
Bowling Green, KY MA #14540 (LS)	122	20.50	19.59	7.44	16.71	27.27	20.88	30.58	42.82	34.71	1.13	2.97	1.18	1.73	0.46
Clarksville, TN-KY MA #17300 (LS)	31	5.21	18.71	12.90	16.83	25.81	24.38	25.81	40.08	35.48	3.14	7.69	5.41	1.92	2.25
Lexington-Fayette, KY MA #30460 (LS)	34	5.72	20.23	16.13	16.69	16.13	21.35	25.81	41.73	41.94	0.14	0.00	0.07	0.13	0.23
<b>State of Indiana:</b>															
Seven Non MA IN Counties (FS)	389	86.44	18.18	14.10	20.12	27.42	25.06	29.50	36.64	28.98	6.30	5.38	6.82	7.23	5.49
Ripley County (LS)	61	13.56	15.87	15.00	18.75	28.33	26.28	20.00	39.10	36.67	3.91	7.14	5.26	2.94	3.64
<b>State of Illinois:</b>															
Seven Non MA IL Counties (FS)	184	93.88	22.33	18.23	21.19	33.70	23.65	23.76	32.83	24.31	6.32	8.33	9.25	5.31	4.44

\* Based on 2008 Peer Mortgage Data (Eastern & Western)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.4% of loans originated and purchased by bank.

\*\*\*\*\*Data shown includes only One to Four Family and Manufactured Housing. (Property type 1 or 2)

Chicago-Naperville- Joliet IL MA #16974 (LS)	12	6.12	23.95	16.67	18.65	25.00	21.66	8.33	35.74	50.00	0.01	0.02	0.01	0.00	0.01
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**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: IL-IN-KY-OH				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 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>Multistate MA:</b>																
Evansville-Henderson, IN-KY MA #21780 (FS)	464	100.00	18.96	15.60	18.48	24.62	24.07	29.89	38.49	29.89	10.14	11.58	12.83	11.11	7.35	
Cincinnati-Middletown, OH-KY-IN MA #17140 (FS)	126	100.00	20.44	36.59	19.28	30.08	25.37	20.33	34.91	13.01	6.98	12.00	6.56	9.52	3.33	
<b>State of Kentucky:</b>																
Six Non MA KY Counties (FS)	233	38.01	15.28	10.34	14.34	20.26	20.27	29.74	50.11	39.66	13.84	10.71	16.07	17.39	11.27	
Four Non MA KY Counties (LS)	202	32.94	17.70	12.44	15.11	20.90	19.44	23.38	47.75	43.28	15.71	25.93	19.57	14.93	12.86	
Bowling Green, KY MA #14540 (LS)	71	11.58	19.59	5.71	16.71	22.86	20.88	27.14	42.82	44.29	7.18	7.69	8.82	7.69	6.10	
Clarksville, TN-KY MA #17300 (LS)	89	14.52	18.71	14.61	16.83	31.46	24.38	31.46	40.08	22.47	35.29	14.29	50.00	27.78	42.86	
Lexington-Fayette, KY MA #30460 (LS)	18	2.95	20.23	16.67	16.69	22.22	21.35	27.78	41.73	33.33	0.92	0.00	1.59	1.24	0.67	
<b>State of Indiana:</b>																
Seven Non MA IN Counties (FS)	388	84.35	18.18	19.95	20.12	22.57	25.06	28.87	36.64	28.61	19.61	12.24	25.68	16.30	21.13	
Ripley County (LS)	72	15.65	15.87	22.22	18.75	8.33	26.28	26.39	39.10	43.06	22.50	0.00	15.00	15.79	33.33	
<b>State of Illinois:</b>																

\* Based on 2008 Peer Mortgage Data (Eastern & Western)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.5% of loans originated and purchased by bank.

\*\*\*\*\* Data shown includes only One to Four Family and Manufactured Housing. (Property type 1 or 2)

Seven Non MA IL Counties (FS)	289	93.83	22.33	16.25	21.19	30.39	23.65	28.27	32.83	25.09	41.10	48.00	50.00	32.43	37.70
Chicago-Naperville-Joliet IL MA #16974 (LS)	19	6.17	23.95	11.11	18.65	33.33	21.66	27.78	35.74	27.78	0.04	0.11	0.06	0.05	0.0

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: IL-IN-KY-OH				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2009					Market Share*				
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****	Overa II	Low	Mod	Mid	Upp	
<b>Multistate MA:</b>																
Evansville-Henderson, IN-KY MA #21780 (FS)	1,056	100.00	18.96	12.44	18.48	19.40	24.07	29.05	38.49	39.11	4.32	4.03	3.15	4.52	4.87	
Cincinnati-Middletown, OH-KY-IN MA #17140 (FS)	196	100.00	20.44	24.74	19.28	30.00	25.37	21.58	34.91	23.68	1.15	2.65	0.98	1.10	0.89	
<b>State of Kentucky:</b>																
Six Non MA KY Counties (FS)	410	37.65	15.28	5.42	14.34	16.26	20.27	23.89	50.11	54.43	5.95	6.76	7.50	6.98	5.14	
Four Non MA KY Counties (LS)	314	28.83	17.70	3.88	15.11	13.27	19.44	22.65	47.75	60.19	8.62	8.89	7.69	8.80	8.73	
Bowling Green, KY MA #14540 (LS)	213	19.56	19.59	8.61	16.71	17.70	20.88	29.67	42.82	44.02	3.86	5.38	3.62	3.12	4.12	
Clarksville, TN-KY MA #17300 (LS)	114	10.47	18.71	10.62	16.83	19.47	24.38	36.28	40.08	33.63	8.91	10.00	6.45	9.89	9.17	
Lexington-Fayette, KY MA #30460 (LS)	38	3.49	20.23	10.81	16.69	18.92	21.35	32.43	41.73	37.84	0.14	0.25	0.10	0.22	0.09	
<b>State of Indiana:</b>																
Seven Non MA IN Counties (FS)	668	81.96	18.18	11.53	20.12	27.01	25.06	28.38	36.64	33.08	6.90	7.18	6.59	6.39	7.34	
Ripley County (LS)	147	18.04	15.87	15.17	18.75	13.79	26.28	33.10	39.10	37.94	7.80	35.71	2.22	8.22	8.24	

\* Based on 2008 Peer Mortgage Data (Eastern & Western)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.5% of loans originated and purchased by bank.

\*\*\*\*\* Data shown includes only One to Four Family and Manufactured Housing. (Property type 1 or 2)

State of Illinois:															
Seven Non MA IL Counties (FS)	306	85.00	22.33	15.84	21.19	22.44	23.65	33.66	32.83	28.06	9.30	9.30	13.45	12.50	5.63
Chicago-Naperville-Joliet IL MA #16974 (LS)	54	15.00	23.95	13.46	18.65	23.08	21.66	25.00	35.74	38.46	0.01	0.02	0.00	0.02	0.01

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: IL-IN-KY-OH			Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 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>Multistate MA:</b>										
Evansville-Henderson, IN-KY MA #21780 (FS)	1,271	100.00	72.89	63.18	70.02	15.50	14.48	3.57	7.36	
Cincinnati-Middletown, OH-KY-IN MA #17140 (FS)	302	100.00	75.47	84.11	82.12	10.60	7.28	1.09	2.41	
<b>State of Kentucky:</b>										
Six Non MA KY Counties (FS)	259	26.81	76.85	94.21	90.35	8.11	1.54	2.56	7.32	
Four Non MA KY Counties (LS)	335	34.68	77.04	76.72	80.60	11.34	8.06	3.72	8.57	
Bowling Green, KY MA #14540 (LS)	240	24.84	75.00	75.42	78.75	15.00	6.25	1.07	2.28	
Clarksville, TN-KY MA #17300 (LS)	85	8.80	76.09	87.06	95.29	1.18	3.53	7.37	18.37	
Lexington-Fayette, KY MA #30460 (LS)	47	4.87	74.99	78.72	55.32	27.66	17.02	0.06	0.21	
<b>State of Indiana:</b>										
Seven Non MA IN Counties (FS)	800	90.91	74.35	73.13	82.88	11.63	5.50	3.91	7.45	
Ripley County (LS)	80	9.09	77.73	91.25	93.75	3.75	2.50	0.77	0.87	
<b>State of Illinois:</b>										
Seven Non MA IL Counties (FS)	274	59.44	73.02	82.12	83.58	10.58	5.84	3.13	7.26	

\* 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 - 2009).

\*\*\*\* 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 2.99% of small loans to businesses originated and purchased by the bank.

Chicago-Naperville- Joliet IL MA #16974 (LS)	187	40.56	74.46	56.68	67.38	12.30	20.32	0.03	0.07
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Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: IL-IN-KY-OH		Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 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>Multistate MA:</b>									
Evansville-Henderson, IN-KY MA #21780 (FS)	292	100.00	98.64	95.89	70.89	24.66	4.45	22.54	29.36
Cincinnati-Middletown, OH-KY-IN MA #17140 (FS)	150	100.00	98.38	96.00	97.33	1.33	1.33	17.07	20.19
<b>State of Kentucky:</b>									
Six Non MA KY Counties (FS)	303	62.35	99.23	97.69	91.75	6.93	1.32	29.84	33.33
Four Non MA KY Counties (LS)	140	28.80	99.58	92.14	80.00	13.57	6.43	13.74	20.83
Bowling Green, KY MA #14540 (LS)	13	2.67	98.60	76.92	61.54	38.46	0.00	5.88	7.41
Clarksville, TN-KY MA #17300 (LS)	29	5.97	97.47	86.21	82.76	10.34	6.90	50.00	60.00
Lexington-Fayette, KY MA #30460 (LS)	1	0.21	96.75	100.00	100.00	0.00	0.00	0.00	0.00
<b>State of Indiana:</b>									
Seven Non MA IN Counties (FS)	572	83.38	97.97	84.44	74.48	18.01	7.52	11.57	15.02
Ripley County (LS)	114	16.62	99.62	93.86	80.70	14.04	5.26	54.72	58.70
<b>State of Illinois:</b>									
Seven Non MA IL Counties (FS)	308	99.35	98.62	99.03	78.25	14.94	6.82	29.24	43.86

\* 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 - 2009).

\*\*\*\* 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 2.08% of small loans to farms originated and purchased by the bank.

Chicago-Naperville- Joliet IL MA #16974 (LS)	2	0.65	95.12	100.00	100.00	0.00	0.00	0.14	0.30
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**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: IL-IN-KY-OH				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Multistate MA:</b>									
Evansville-Henderson, IN-KY MA #21780 (FS)	0	0	58	2,002	58	2,002	100.00	0	0
Cincinnati-Middletown, OH-KY-IN MA #17140 (FS)	0	0	33	575	33	575	100.00	0	0
<b>State of Kentucky:</b>									
Six Non MA KY Counties (FS)	0	0	38	477	38	477	20.35	0	0
Four Non MA KY Counties (LS)	0	0	35	478	35	478	20.39	0	0
Bowling Green, KY MA #14540 (LS)	0	0	19	443	19	443	18.90	0	0
Clarksville, TN-KY MA #17300 (LS)	0	0	3	8	3	8	0.34	0	0
Lexington-Fayette, KY MA #30460 (LS)	0	0	8	938	8	938	40.02	0	0
<b>State of Indiana:</b>									
Seven Non MA IN Counties (FS)	0	0	35	662	35	662	99.10	0	0
Ripley County (LS)	0	0	6	6	6	6	0.90	0	0
<b>State of Illinois:</b>									
Seven Non MA IL Counties (FS)	0	0	15	65	15	65	98.48	0	0
Chicago-Naperville-Joliet IL MA #16974 (LS)	0	0	6	1	6	1	1.52	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: IL-IN-KY-OH Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2009																	
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>Multistate MA:</b>																	
Evansville-Henderson, IN-KY MA ###21780 (FS)	100.00	20	100.00	0.00	25.00	60.00	15.00	0	0	0	0	0	0	2.25	22.50	51.69	23.56
Cincinnati-Middletown, OH-KY-IN MA #17140 (FS)	100.00	2	100.00	0.00	100.00	0.00	0.00	1	2	0	-1	0	0	0.00	33.25	44.40	22.35
<b>State of Kentucky:</b>																	
Six Non MA KY Counties (FS)	25.46	5	27.78	0.00	0.00	60.00	40.00	0	0	0	0	0	0	0.00	0.00	60.87	39.13
Four Non MA KY Counties (LS)	41.20	7	38.89	0.00	0.00	42.86	57.14	0	0	0	0	0	0	0.00	2.95	49.07	47.98
Bowling Green, KY MA #14540 (LS)	19.05	4	22.22	0.00	0.00	75.00	25.00	0	0	0	0	0	0	0.00	18.05	54.35	27.60
Clarksville, TN-KY MA #17300 (LS)	14.29	2	11.11	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Lexington-Fayette, KY MA #30460 (LS)	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	9.99	19.02	39.36	31.49
<b>State of Indiana:</b>																	
Seven Non MA IN Counties (FS)	88.87	14	82.35	0.00	28.57	71.43	0.00	0	0	0	0	0	0	0.00	16.45	76.05	7.50
Ripley County (LS)	11.13	3	17.65	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	82.69	17.31
<b>State of Illinois:</b>																	
Seven Non MA IL Counties (FS)	54.59	8	66.67	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	23.42	73.19	3.39

Chicago-Naperville- Joliet IL MA #16974 (LS)	45.41	4	33.33	0.00	0.00	25.00	75.00	0	1	0	0	0	- 1	10.18	28.93	38.33	22.56
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