



PUBLIC DISCLOSURE

February 12, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank
Charter Number 10465

302 South Main Street
Cloverdale, IN 46120

Office of the Comptroller of the Currency

Indianapolis Field Office 8777 Purdue Road, Suite 105 Indianapolis, IN 46268

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, nor should it 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.

Table of Contents

OVERALL CRA RATING 3

DEFINITIONS AND COMMON ABBREVIATIONS 4

DESCRIPTION OF INSTITUTION 8

SCOPE OF THE EVALUATION..... 9

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW 11

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS..... 12

 LENDING TEST 12

APPENDIX A: SCOPE OF EXAMINATION..... 1

APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS..... 1

Overall CRA Rating: First National Bank is rated Satisfactory.

The Lending Test is rated: Satisfactory.

First National Bank (FNB or bank) has a satisfactory record of meeting the credit needs of its community. Factors supporting the Satisfactory rating include:

- Reasonable loan-to-deposit (LTD) ratio;
- Substantial majority of loans made inside the bank's assessment area (AA);
- Reasonable penetration among individuals of different incomes and businesses of different sizes; and
- Excellent dispersion of loans in low- and moderate-income census tracts within the AA.

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 generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), 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 five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) 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 Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

First National Bank is a single-state institution headquartered in Cloverdale, IN, approximately 45 miles southwest of Indianapolis. As of December 31, 2017, the bank had total assets of \$309 million and tier 1 capital of \$27.2 million. FNB is a wholly owned subsidiary of First National Bank Corp, a one-bank holding company, also headquartered in Cloverdale, IN.

FNB operates seven branches in central Indiana, which includes the main office. The main office and two branches are located in Putnam County, three branches in Hendricks County, and one branch in Johnson County. The bank has eight deposit-taking ATMs; two ATMs are located at the Greencastle branch and one ATM is located at each of the remaining branches and the main office. The bank has one assessment area (AA), which is in the Indianapolis-Carmel-Anderson Metropolitan Statistical Area (MSA), and includes Putnam, Hendricks, Johnson, and Morgan Counties, as well as two census tracts (CTs) in Owen County.

FNB offers a traditional mix of loan and deposit products. The bank's total loans account for 52.2 percent of total assets. The bank's loan portfolio totaled \$161.4 million, as of December 31, 2017. The portfolio is largely concentrated in residential real estate loans and business loans. Residential real estate loans account for 39.0 percent of total loans, while business loans account for 38.5 percent of total loans. The following table shows the bank's loan portfolio composition:

Loan Portfolio Composition			
Loan Category	Amount (\$000's)	Percent of Total Loans	Percent of Total Assets
Residential Real Estate Loans	\$62,893	38.98%	20.33%
Business Loans	\$62,090	38.48%	20.08%
Farm Loans	\$26,691	16.54%	8.63%
Consumer Loans	\$3,816	2.36%	1.23%
Other Loans and Leases	\$5,867	3.64%	1.90%
Total Loans	\$161,357	100.00%	52.17%

Source: Call Report December 31, 2017

Based on the number and dollar volume of loan originations in 2015 and 2016, the bank's primary products were residential real estate loans and business loans. The following table shows the percent of loans originated by number and dollar:

Loan Originations			
Loan Category	Number of Loans Originated	Percent of Number of Loans Originated	Percent of Dollar of Loans Originated
Residential Real Estate Loans	397	27.92%	33.81%
Business Loans	353	24.82%	44.89%
Farm Loans	104	7.31%	17.58%
Consumer Loans	568	39.94%	3.73%
Total Loans	1,422	100.00%	100.00%

Source: Internal Bank Loan Origination Report for 2015 and 2016

There are no financial, legal, or other impediments that would hinder the bank's ability to help meet the credit needs of its assessment area. The bank received a rating of "Satisfactory" at the last CRA examination dated February 25, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Examiners utilized Small Bank procedures to assess FNB's record of meeting the credit needs of its community. Small Bank procedures included an evaluation of:

- The loan-to-deposit ratio;
- The percentage of loans within the bank's AA;
- The bank's record of lending to borrowers of different income levels and businesses of different sizes;
- The bank's record of lending in low- and moderate-income geographies in the AA; and
- The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its AA.

The evaluation period for this review is from February 26, 2013 to February 12, 2018. To evaluate the bank's lending performance, we reviewed loan originations from January 1, 2015 through December 31, 2016. The Lending Test focused on the bank's primary loan products, which we determined were residential real estate loans and business loans.

Data Integrity

We tested the accuracy of FNB's Home Mortgage Disclosure Act (HMDA) data and determined it to be accurate. FNB is not subject to the data collection and reporting requirements of CRA; therefore, business lending performance was evaluated using data collected during our review of bank loan files.

Selection of Areas for Full-Scope Review

FNB has one AA, located within the Indianapolis-Carmel-Anderson IN MSA (Indianapolis MSA). The Indianapolis MSA AA includes all of Putnam, Hendricks, Johnson, and Morgan Counties, as well as two CTs in Owen County. Owen County is located in the Bloomington IN MSA; however, these CTs were combined with the Indianapolis MSA AA for analysis purposes.

Ratings

The bank's overall rating is based on the full-scope review of FNB's only AA, the Indianapolis MSA AA.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

Conclusions with Respect to Performance Tests

LENDING TEST

FNB's performance in helping meet the credit needs of its AA through lending is rated Satisfactory.

Loan-to-Deposit Ratio

FNB's LTD ratio is reasonable given its asset size, financial condition, and AA credit needs. The bank's average LTD ratio since the last exam was 60.45 percent, calculated on a bank-wide basis. This considered all quarterly LTD ratios from March 31, 2013 through December 31, 2017. The quarterly LTD ratios ranged from a high of 64.74 percent, at March 31, 2013, to a low of 53.02 percent, at June 30, 2017. This LTD ratio does not consider the notable amount of loans that were sold during each quarter. Upon adjusting the LTD ratio to account for loans sold during each of the 20 quarters, the average LTD ratio increased to 83.66 percent. Other banks in the AA, with assets between \$60 million and \$500 million, had average LTD ratios that ranged between 47.34 percent and 104.25 percent over the same period. As of December 31, 2017, FNB also had \$10.7 million in loan participations which they serviced.

Lending in Assessment Area

FNB originated a substantial majority of loans to borrowers located within its designated AA. Examiners analyzed all HMDA reportable residential real estate loans and a random sample of 20 business loans originated between January 1, 2015 and December 31, 2016 to assess FNB's lending activities in the AA. The proportion of lending inside versus outside the bank's AA was calculated on a bank-wide basis. The following table illustrates the number and dollar volume of loans originated inside and outside the bank's AA during the evaluation period.

Table 1 - Lending in Indianapolis MSA AA										
Type of Loan	Number of Loans					Dollars of Loans (000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Residential Real Estate	418	89.89%	47	10.11%	465	\$51,517	88.12%	\$6,943	11.88%	\$58,460
Business Loans	18	90.00%	2	10.00%	20	\$1,481	82.96%	\$304	17.04%	\$1,785
Totals	436	89.90%	49	10.10%	485	\$52,998	87.97%	\$7,247	12.03%	\$60,245

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

The overall distribution of loans to borrowers of different incomes and businesses of different sizes reflects reasonable penetration, which meets the standards for satisfactory performance.

Residential Real Estate Loans

The distribution of residential real estate loans reflects reasonable penetration among low- and moderate-income borrowers. FNB originated 24.41 percent of its residential real estate loans to low- and moderate-income borrowers. The percentage of loans to low-income borrowers was below the percentage of low-income families in the AA, but is reasonable considering the disproportionate impact of the poverty level on lending opportunities, as well as competition in the AA. The percentage of loans to moderate-income borrowers was near to the percentage of moderate-income families in the AA.

Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Residential Real Estate	15.38	7.80	17.00	16.61	23.10	21.69	44.52	46.10

Source: 2015 and 2016 HMDA LAR; 2010 U.S. Census data

Business Loans

The distribution of loans to businesses reflected reasonable penetration among businesses of different sizes. FNB originated 75.0 percent of its business loans to businesses with revenues of \$1 million or less. The percentage of loans to businesses with revenues of \$1 million or less was within a reasonable range to the percentage of such businesses in the AA.

Business Revenues (or Sales)	<= \$1,000,000	> \$1,000,000	Unavailable	Total
% of AA Businesses	84.13%	4.52%	11.35%	100.00%
% of Bank Loans in AA by #	75.00%	25.00%	0.00%	100.00%
% of Bank Loans in AA by \$	51.92%	48.08%	0.00%	100.00%

Source: Business loan sample; 2010 U.S. Census data

Geographic Distribution of Loans

The overall geographic distribution of residential real estate and business loans exhibits excellent dispersion, which exceeds the standards for satisfactory performance. The AA did not include any low-income census tracts.

Residential Real Estate Loans

The geographic distribution of residential real estate loans reflects excellent dispersion. The percentage of loans originated in moderate-income CTs exceeded the percentage of owner-occupied housing in those CTs.

Table 3 - Geographic Distribution of Residential Real Estate Loans in Indianapolis MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Residential Real Estate	0.00%	0.00%	8.74%	14.24%	58.15%	71.19%	33.10%	14.58%

Source: 2015 and 2016 HMDA LAR; 2010 U.S. Census data

Business Loans

The geographic distribution of business loans reflects excellent dispersion. FNB originated 10.0 percent of its business loans in moderate-income CTs. This percentage falls slightly below the percentage of businesses located in these geographies. However, the bank faced notable competition from lenders serving these CTs, with the top five lenders originating 51.1 percent of small business loans in the AA.

Table 3A - Geographic Distribution of Commercial Loans in Indianapolis MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business Loans	0.00%	0.00%	12.11%	10.00%	56.77%	65.00%	31.12%	25.00%

Source: Business loan sample; 2010 U.S. Census data

Responses to Complaints

FNB did not receive any complaints regarding its CRA performance during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test: 01/01/2015 to 12/31/2016	
Financial Institution		Products Reviewed
First National Bank (FNB) Cloverdale, Indiana		Residential Real Estate and Business
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Indianapolis-Carmel-Anderson IN MSA	Full-Scope	Hendricks County Johnson County Morgan County Putnam County Owen County – Census Tracts 9555 and 9556 only

Appendix B: Community Profiles for Full-Scope Areas

Indianapolis MSA AA

Demographic Information for Full-Scope Area: Indianapolis-Carmel-Anderson IN MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	65	0.00	13.85	61.54	24.62	0.00
Population by Geography	399,396	0.00	10.11	58.69	31.20	0.00
Owner-Occupied Housing by Geography	112,882	0.00	8.74	58.15	33.10	0.00
Businesses by Geography	21,846	0.00	12.11	56.77	31.12	0.00
Farms by Geography	1,246	0.00	4.33	71.03	24.64	0.00
Family Distribution by Income Level	105,842	15.38	17.00	23.10	44.52	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	34,265	0.00	16.57	63.27	20.17	0.00
Median Family Income	\$64,141	Median Housing Value		\$146,875		
FFIEC Adjusted Median Family Income for 2016	\$65,600	Unemployment Rate (2010 US Census)		3.08%		
Households Below the Poverty Level	8%					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2010 U.S. Census, and 2016 FFIEC Adjusted MFI.

The Indianapolis MSA AA is a single-state AA consisting of 65 CTs, encompassing all of Hendricks, Johnson, Morgan, and Putnam counties, as well as two CTs in Owen County. There were no low-income CTs, nine moderate-income CTs, 40 middle-income CTs, and 16 upper-income CTs in the AA. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income CTs.

Economic Information

According to the Bureau of Labor Statistics, the unemployment rate in all five counties improved over the evaluation period, as did the statewide unemployment rate. However, the unemployment rate for each county varied in comparison to the state unemployment rate. The following table summarizes the annual unemployment rates (not seasonally adjusted):

Unemployment Rates					
	2013	2014	2015	2016	2017
State of Indiana	7.7%	5.9%	4.8%	4.4%	3.6%
Hendricks County	5.8%	4.6%	3.8%	3.5%	2.9%
Johnson County	6.3%	5.0%	4.1%	3.7%	3.0%
Morgan County	7.6%	5.8%	4.7%	4.2%	3.5%
Owen County	10.1%	8.1%	6.3%	5.5%	4.4%
Putnam County	8.7%	6.6%	5.1%	4.5%	3.6%

Source: Bureau of Labor Statistics

According to Hoosiers by the Numbers, the primary business industries in the AA were service industries, retail trade, construction, finance, insurance, and real estate. Some of the major employers were Mr. Electric and Amazon Fulfillment Center in Hendricks County, Whisper Hearing Center and Johnson Memorial Hospital in Johnson County, Nice-pak Products Inc. and Toa LLC in Morgan County, Boston Scientific Corp and Cook Urological Inc. in Owen County, and International Automotive Components and Walmart Distribution Center in Putnam County.

The AA includes 156,044 housing units, of which 72.3 percent are owner-occupied, 19.0 percent are rental-occupied, and 8.7 percent are vacant. As show in the table below, owner-occupied units comprise 54.7 percent of housing units in moderate-income CTs, while 32.4 percent are rental units and 13.0 percent are vacant.

Housing Distribution by Tract Income Level			
	Owner-Occupied	Rental-Occupied	Vacant
Low Income	0.00%	0.00%	0.00%
Moderate Income	54.67%	32.35%	12.98%
Middle Income	70.26%	20.21%	9.53%
Upper Income	83.86%	10.98%	5.16%

Source: 2010 US Census

According to the 2010 U.S. Census, the total population of the AA was 399,396, with 8.0 percent of households living below the poverty level. Low-income families represented 15.4 percent of families in the AA and moderate-income families represented

Competition

Competition for deposits is substantial due to the number and size of financial institutions present in the AA. As of June 30, 2017, FNB’s deposits in the AA totaled \$286,454, or 4.7 percent of the total market share. According to the FDIC Deposit Market Share Report, FNB ranked 9 out of 30 deposit-taking institutions in the AA. The top five institutions for deposit market share in the AA were JP Morgan Chase Bank, PNC Bank, First Merchants Bank, Fifth Third Bank, and BMO Harris Bank. These institutions accounted for 43.5 percent of deposits in the AA.

Notable competition for all loan products also exists. Aggregate HMDA data for 2016 showed that 426 lenders originated or purchased residential real estate loans in the AA. The top five lenders were Loandepot.com, Wells Fargo Bank, Caliber Home Loans, Freedom Mortgage Corporation, and Ruoff Mortgage Company. These lenders accounted for 22.6 percent of the market share, by number of loans originated. Additionally, aggregate CRA loan data indicated that 93 lenders originated or purchased small business loans in the AA. The top five small business lenders were Chase Bank USA, American Express, PNC Bank, Citibank, and Capital One Bank. These lenders accounted for 51.1 percent of the market share, by number of loans originated.

Two community contacts were conducted in the counties served by FNB. Both contacts noted the need for more funding for non-profits. One contact stated that since the counties are just outside of the Indianapolis metro area, non-profits in these smaller counties are overlooked for funding. A contact representing businesses in the AA felt that local community banks were doing a good job of lending to small businesses. He stated that community banks should continue to meet the needs of small businesses in the area, as larger banks have more rigorous lending standards and are not able to be flexible in lending to small businesses.