



PUBLIC DISCLOSURE

October 7, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Old National Bank
Charter Number: 8846

1 Main Street
Evansville, IN 47708

Office of the Comptroller of the Currency

425 South Financial Place, Suite 1700
Chicago, Illinois 60605

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.

Table of Contents

Table of Contents

OVERALL CRA RATING	3
DESCRIPTION OF INSTITUTION	4
SCOPE OF THE EVALUATION	5
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	10
MULTISTATE METROPOLITAN STATISTICAL AREA RATING	11
<i>Evansville IN-KY MMSA</i>	11
<i>Louisville KY-IN MMSA</i>	24
STATE RATING	36
<i>State of Illinois</i>	36
<i>State of Indiana</i>	49
<i>State of Kentucky</i>	87
<i>State of Michigan</i>	100
<i>State of Minnesota</i>	138
<i>State of Wisconsin</i>	151
APPENDIX A: SCOPE OF EXAMINATION.....	A-1
APPENDIX B: SUMMARY OF MMSA AND STATE RATINGS	B-1
APPENDIX C: DEFINITIONS AND COMMON ABBREVIATIONS	C-1
APPENDIX D: TABLES OF PERFORMANCE DATA	D-1

Overall CRA Rating

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

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

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

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on the performance across all rating areas with more weight given to those areas where the bank has the greatest number of branches, largest deposit market share and overall qualified lending. The rating areas receiving the most weight were the Evansville IN-KY multistate metropolitan statistical area (MMSA), the state of Indiana, the state of Michigan, and the state of Wisconsin.
- The Investment Test rating is based on our assessment of performance within the rating areas, with the same weights as the lending test.
- The Service Test rating is based on our assessment of the bank's performance within the rating areas, with the same weights given to rating areas as under the lending test.

Lending in Assessment Area

A substantial majority of the bank's loans are in its assessment area (AA).

The bank originated and purchased 85.4 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	17,561	85.2	3,049	14.8	20,610	2,914,038	78.7	790,499	21.3	3,704,537
Small Business	9,314	86.4	1,469	13.6	10,783	1,813,778	83.2	365,641	16.8	2,179,419
Small Farm	1,246	81.7	280	18.3	1,526	169,163	82.5	35,987	17.5	205,150
Total	28,121	85.4	4,798	14.6	32,919	4,896,979	80.4	1,192,127	19.6	6,089,106

Home mortgage and small business loans are considered primary products of the bank. These products have a greater direct impact and are more responsive to credit needs in the bank's assessment areas. Conclusions are factored into the overall analysis of the geographic distribution of lending by income level of geography.

Description of Institution

Old National Bank ("ONB" or "bank") is an interstate bank chartered in 1834 and headquartered in Evansville, Indiana (IN). It is wholly owned by Old National Bancorp (ONBC), a one-bank holding company also headquartered in Evansville, IN. As of December 31, 2018, ONB had total assets of \$19.6 billion and tier 1 capital of \$1.7 billion.

ONB has two subsidiaries, ONB Community Equity, LLC and Evansville Downtown Growth Fund, LLC, which are involved in community development. The subsidiaries hold equity investments in various entities, including three low-income housing tax credit projects, two federal housing tax credit projects, and two community development financial institutions. They provide affordable housing for low- and moderate-income (LMI) individuals and families and economic development of LMI geographies primarily within the bank's AAs. We also considered the activities of an affiliate, ONB Foundation (ONBF), in evaluating the bank's community development performance during the evaluation period. ONBF provides charitable grants to a variety of community service and economic development organizations benefiting LMI individuals and LMI geographies within the bank's AAs.

As of December 31, 2018, total loans were \$12.2 billion, representing 62.2 percent of total assets. Approximately 65.9 percent of the loan portfolio consisted of real estate loans including commercial and 1-4 family residential properties totaling \$8.0 billion. The balance of the loan portfolio consisted of approximately 19.6 percent commercial loans totaling \$2.4 billion, 10.4 percent consumer loans totaling \$1.1 billion, 3.4 percent other loans totaling \$549.8 million, and 0.7 percent agricultural loans totaling \$120.3 million. The bank currently operates 193 full-service branch offices and 228 deposit-taking automated teller machines (ATM) across 36 AAs in six states and two MMSAs. The six states are Illinois (IL), Indiana (IN), Kentucky (KY), Michigan (MI), Minnesota (MN),

Wisconsin (WI). The two MMSAs are Evansville IN-KY MMSA and Louisville-Jefferson KY-IN MMSA. The following are branches acquired since the last CRA examination:

- May 2016, the bank acquired AnchorBank in WI, which added eight AAs and 46 branches.
- November 2017, the bank acquired AnchorBank in MN, which added two AAs and 17 branches.
- July 2018, the bank converted the Lexington, KY, loan production office to a full-service branch, which added a new AA.
- November 2018, the bank acquired KleinBank, which added three new AAs in MN and 18 branches.

ONB's mission is focused on community banking with a full-suite of products and services. The bank offers a variety of commercial, retail, and wealth management financial services. The retail banking services include overdraft facilities, drive-in and night deposit services, safe deposit facilities, international banking services, and remote deposit capture. Starting in May 2018, ONB also participates in the Allpoint network with 55,000 surcharge-free ATMs located worldwide in non-bank locations that ONB customers can use. In addition to branches and ATMs, the bank's delivery systems include 24/7 telephone banking, online banking, and mobile banking. Retail investment and insurance products are offered through a third party, LPL Financial.

There were no legal or financial factors impeding the bank's ability to help meet credit needs in its AAs during the evaluation period. ONB's CRA performance was rated "Satisfactory" in the last public evaluation dated February 2017.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation (PE) assesses the bank's performance under the large bank Lending, Investment, and Service Tests. For the Lending Test, we analyzed home mortgage loans that the bank reported under the Home Mortgage Disclosure Act (HMDA), and small loans made to businesses and small loans made to farms which the bank reported under the CRA. Loans were reviewed for the period of January 1, 2016, through December 31, 2018. Multifamily loans are not a primary loan product; therefore, we did not evaluate this product separately. However, we did consider multifamily loans that met the Community Development (CD) definition as part of the evaluation of CD lending. Primary loan products, for purposes of this review, are products in which the bank originated at least 20 loans within an AA during one or more of the analysis periods within the overall evaluation period.

The OCC compared bank loan data for all applicable years in the state and multistate rating areas to: demographic data using the 2010 U.S. Census and 2015 American Community Survey (ACS), as applicable; Federal Financial Institutions Examination Council (FFIEC) adjusted median family incomes; 2017 Dun and Bradstreet small

business demographic data; 2016-2018 peer mortgage loan data reported under HMDA; and 2017 peer small business data reported under CRA.

In evaluating the geographic distribution and borrower income criteria under the Lending Test for HMDA, 2016, 2017, and 2018 data were analyzed separately. Performance Tables O, P, Q, R, S, and T in appendix D include data covered by the analysis period 2016, 2017 and 2018.

When evaluating the bank's performance under the Lending Test, we placed equal weight on the bank's performance for each analysis year of data. The evaluation period for CD loans, Investment Test, and the Service Test was also January 1, 2016 through December 31, 2018.

Small loans to farms were not a primary loan product in the Louisville KY-IN MMSA and the states of Illinois, Michigan, Wisconsin, and Minnesota. The bank did not originate or purchase any small loans to farms during the evaluation period; therefore, they were not analyzed. Minimal emphasis was placed on small loans to farms' performance in the Evansville IN-KY MMSA and the states of Indiana and Kentucky.

Bank and branch deposit data is as of June 30, 2018 and was drawn from the Federal Deposit Insurance Corporation (FDIC). The distribution of bank branches is compared to U.S. Census 2015 ACS population estimates.

ONB made several acquisitions since the last CRA review, and only those acquisitions, which provided at least six months of data from the date of the merger were reviewed. The Klein Financial acquisition in November 2018 was not included in this review as there was less than six months of data for review.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA) or MMSA are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope.

Refer to the "Scope" section under each state and MMSA Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state and MMSA ratings. The state ratings are based primarily on those areas that received full-scope reviews.

The Evansville IN-KY MMSA, the states of Indiana, Michigan, and Wisconsin rating areas carried the greatest weight in our conclusions because these areas represented the bank's most significant markets in terms of deposit concentration, branch distribution, and reportable loans. As of June 30, 2018, deposits in these rating areas comprised 80.1 percent of ONB's total deposits, 80.5 percent of bank branches, and 89.7 percent of reportable loan originations.

ONB's level of lending for 2016 was 9,063 loans totaling \$1.6 billion; for 2017, it was 8,370 loans totaling \$1.5 billion; and for 2018, it was 10,688 loans totaling \$1.8 billion. When evaluating the bank's lending, we placed the most weight on home mortgage lending. Home mortgage lending accounted for 62.4 percent of total bank originations throughout the evaluation period.

Refer to the "Scope" section under each state and MMSA section for details regarding how the areas were weighted in arriving at the respective ratings.

Other Performance

ONB offers government-guaranteed loan products including Federal Housing Administration (FHA), United States Department of Agriculture (USDA) Rural Housing, Veterans Affairs (VA), and Small Business Administration (SBA) loans. These loans are included in the totals for home mortgage loans and small loans to businesses, respectively. During the evaluation period, ONB originated 381 FHA loans totaling \$52.5 million, 178 USDA Rural Housing loans totaling \$19.8 million, 151 VA loans totaling \$28.7 million, and 257 SBA loans totaling \$170.8 million.

Additional lending programs were considered and had a positive impact on the bank's overall lending performance. ONB used a proprietary affordable home mortgage loan product to meet the affordable housing needs of LMI individuals or families. The bank also participates in some flexible mortgage lending programs benefitting underserved markets and/or LMI individuals or families in various states. ONB employs mortgage staff dedicated to working with low-income and first-time homebuyers. These loan products are summarized below.

Home Manager Mortgage (HMM)

The flexible loan underwriting criteria for this proprietary home mortgage loan product includes up to a maximum of 97.0 percent financing with no private mortgage insurance (PMI) requirements. This product offers borrowers the ability to use down payment funds from personal savings, a gift from a family member, or a grant from a qualified agency. Home Manager Mortgages are restricted to LMI borrowers who complete the Housing and Urban Development (HUD) Certified Home Buyer Education Program and do not qualify for an FHA loan. Successful completion of a first-time homebuyer counseling program may qualify borrowers for down payment assistance (DPA). Over the course of the evaluation period, ONB originated 42 HMM loans totaling \$3.9 million. The following is a breakdown of the HMM loans by rating area:

- 18 loans totaling \$1.4 million in the Evansville IN-KY MMSA
- 9 loans totaling \$866 thousand in the state of Wisconsin
- 8 loans totaling \$819 thousand in the state of Indiana
- 6 loans totaling \$695 thousand in the state of Michigan
- 1 loan totaling \$86 thousand in the Louisville KY-IN MMSA

Amish and Old Order Mennonite Residential Mortgage

This proprietary home mortgage loan product targets underserved Amish and Old Order Mennonite borrower population who seek financing for the purchase or construction of a primary residence; however, they do not qualify for traditional loan products offered by ONB. These borrowers typically have housing and income ratios that exceed bank guidelines. In addition, the home (collateral) typically does not have electricity or electrical wiring, heating or air conditioning, and hazard insurance protection underwritten by a certified or licensed contractor or agency. ONB exhibits flexibility with

a manual underwriting process that uses a modified cost of living allowance for debt service calculations that excludes or reduces the allowance for insurance, food, housing, and transportation expenses. In addition, applicants are not required to have a credit score and for those that do, there is no minimum credit score required. Over the course of the evaluation period, ONB originated 10 of these loans totaling \$1.2 million exclusively in the state of Indiana.

Other

ONB works in conjunction with state housing agencies and city or county programs to offer affordable FHA and VA products to first time and other qualified homebuyers. These programs may include down payment and closing cost assistance. ONB has worked with Kentucky Housing Corporation (KHC), Indiana Housing and Community Development Authority (IHCDA), Michigan State Housing Development Authority (MSHDA), and Wisconsin Housing and Economic Development Authority (WHEDA) to offer flexible, affordable loan products under each of the agency's respective programs. Refer to the "Product Innovation and Flexibility" section – in the Lending Test section of each MMSA or state for additional information, as applicable.

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.

Multistate Metropolitan Statistical Area Rating

Evansville IN-KY MMSA

CRA rating for the Evansville IN-KY MMSA¹:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Excellent responsiveness to credit needs in its AAs, considering the number and amount of home mortgage loans and small loans to businesses in its AAs;
- Excellent geographic distribution of loans in its AA;
- Adequate distribution, particularly in its AAs, of loans among individuals of different income levels and businesses and farms of different sizes;
- Leadership in making CD loans, which had a positive impact on lending performance in the AA;
- An excellent level of qualified CD investments and grants, which were responsive to the AAs identified community needs;
- Services do not vary in any way that inconveniences portions of the bank's AA, particularly LMI geographies and individuals; and
- A significant level of CD services.

Description of Institution's Operations in Evansville IN-KY MMSA

ONB's Evansville IN-KY MMSA AA consists of Gibson, Posey, Vanderburgh, Warrick, and Henderson counties. The bank's AA has 78 census tracts (CTs) which includes 11-low-income, 18-moderate-income, 33-middle-income, 14-upper-income, and two-NA. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The bank operates 15 branches and 20 deposit taking ATMs within the AA. Two branches and 1 ATM are in low-income CTs, and four branches and 5 ATMs are in moderate-income CTs.

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

According to FDIC Deposit Market Share data as of June 30, 2018, ONB had \$2.0 billion in deposits with a deposit market share of 34.4 percent. ONB ranked first in total deposits out of 22 banks in the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Evansville IN-KY MMSA – 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	78	14.1	23.1	42.3	17.9	2.6
Population by Geography	314,263	8.9	19.0	45.3	26.7	0.2
Housing Units by Geography	139,778	10.0	20.8	44.9	24.0	0.3
Owner-Occupied Units by Geography	85,908	5.7	13.6	48.2	32.4	0.1
Occupied Rental Units by Geography	40,032	15.9	34.2	39.3	10.1	0.5
Vacant Units by Geography	13,838	19.3	27.1	40.7	12.4	0.6
Businesses by Geography	17,040	8.8	21.0	39.9	26.1	4.2
Farms by Geography	871	2.9	8.8	59.2	28.4	0.7
Family Distribution by Income Level	81,857	21.3	17.6	20.6	40.4	0.0
Household Distribution by Income Level	125,940	23.6	17.1	17.4	41.9	0.0
Median Family Income MSA - 21780		\$61,595				
Evansville, IN-KY MSA		\$61,100				
2018 FFIEC AMFI						
			Median Gross Rent			\$690
			Families Below Poverty Level			11.1%
Source: 2015 ACS Census and 2018 D&B Data						
Due to rounding, totals may not equal 100.0						
(*) The NA category consists of geographies that have not been assigned an income classification.						

Scope of Evaluation in Evansville IN-KY MMSA

For the Evansville IN-KY MMSA, we completed a full scope review of Posey and Vanderburgh counties in IN and Henderson county in KY. The AA represents 9.52 percent of total bank branches, 11.28 percent of mortgage originations, 14.96 percent of CRA loan originations and 14.64 percent total bank deposits.

Housing Characteristics

According to the 2010 U.S. Census, 61.5 percent of the total housing units in the AA were owner-occupied and 28.6 percent were rental occupied units. Additionally, 5.7 percent of all owner-occupied units and 15.9 percent of renter occupied units were in low-income CTs. Furthermore, 9.7 percent of all single family (1-4 unit) homes and 14.2 percent of multifamily (five plus unit) housing units were in low-income tracts.

Also, 13.6 percent of all owner-occupied units and 34.2 percent of renter occupied units were in moderate-income CTs. Furthermore, 18.6 percent of all single family (1-4 unit)

homes and 36.8 percent of multifamily (five plus unit) housing units were in moderate-income tracts.

Vacant units in the AA were 19.2 percent and 12.9 for low- and moderate-income CTs, respectively. The median age of AA housing stock was 70 and 57 years for low- and moderate-income CTs, respectively.

Employment

According to the Bureau of Labor Statistics of the Department of Labor (BLS), the unemployment rate for this AA was 7.3 percent in January 2016, but it dropped to 3.0 percent for December 2018. The national unemployment rate was 4.9 percent for January 2016, and it dropped to 3.9 percent for December 2018. The AA 2018 unemployment rate is lower than the national unemployment rate.

Housing Affordability

Qualifying for a mortgage loan in the AA with an estimated payment of \$858.64 would be a challenge for low-income borrowers, which is based on the following analysis. The 2018 FFIEC area median family income (AMFI) in the AA is \$61,595. The median housing value in the AA is \$105,050 in January 2016 and \$159,950 in December 2018 reflecting a percent change of 52.3 from January 2016 to December 2018 according to Realtor.com data. Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$32,550 per year (or less than 50 percent of the 2018 FFIEC AMFI in the AA) could afford a \$151,586 mortgage with a payment of \$814 per month. A moderate-income borrower making \$52,080 per year (or less than 80 percent of the 2018 FFIEC AMFI in the AA) could afford a \$242,539 mortgage with a payment of \$1,302 per month.

Large Employers in the AA

AA large employers include the following: Deaconess Hospital; St. Vincent; Berry Plastics; University of Southern Indiana; SKANSKA; T.J. Maxx; Alcoa; and Koch-Enterprises Inc.

Community Contacts

The OCC conducted six community contacts including one local community development corporation, two local nonprofit affordable housing organizations, two county economic development organizations, and one listening session along with the FDIC of local community development corporations in the AA, which reported the following identified needs within this community:

- Affordable Housing for LMI residents
- Financial Literacy programs

- Small dollar business loans
- Small business development loans

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN EVANSVILLE IN-KY MMSA

LENDING TEST

The bank's performance under the Lending Test in Evansville IN-KY MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Evansville IN-KY MMSA is excellent. We considered the factors discussed in describing the bank's operation in the MMSA below.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs, considering the number and amount of home mortgage, small business, and small farm loans in the AA. We considered the lending volume in the AA relative to ONB's capacity based on deposits, competition, and market presence.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Evansville IN-KY MMSA	1,811	1,449	59	13	3,332

Dollar Volume of Loans (\$000's)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Evansville IN-KY MMSA	\$239,806	\$271,078	\$8,390	\$29,777	\$549,051

According to 2018 peer mortgage data, ONB ranked in the top one percent of lenders, second out of 258 lenders, originating home mortgage loans in the AA. The bank's market share of 6.9 percent and rank in loans is weaker than the bank's top market share and rank in deposits. The top mortgage lender in the AA is Evansville Teachers with a market share of 14.7 percent. The remaining three largest mortgage lenders have captured 30.3 percent of the market, which includes Heritage Federal Credit Union with a market share of 5.9 percent, Mortgage Masters of Indiana with a market share of 5.5 percent, and Fifth Third Bank with a market share of 4.2 percent.

According to 2017 peer small business data, ONB ranked second out of 71 lenders originating small business loans in the AA. The bank's market share of 11.8 percent and rank in loans is weaker than the bank's market share and rank in deposits. The top small business lender is American Express, Federal Savings Bank (FSB) with a 14.20

market share. The remaining three largest small business lenders have captured 40.7 percent of the market. The other large small business lenders include Synchrony Bank with a market share of 9.5 percent, German American Bank with a market share of 8.8 percent, and Capital One Bank, NA with a market share of 8.2 percent.

According to 2017 peer small farm data, ONB ranked fourth out of 15 lenders originating small farm loans in the AA. The bank's market share of 7.3 percent and rank in loans is weaker than the bank's market share and rank in deposits. The remaining four largest small farm lenders have captured 79 percent of the market. The other large small farm lenders are Independence Bank of Kentucky with a market share of 32.2 percent, German American Bank with a market share of 25.8 percent, John Deere Financial, FSB with a market share of 18.2 percent, and Capital One Bank, NA with a market share of 2.9 percent.

Distribution of Loans by Income Level of the Geography

During the evaluation period, the overall geographic distribution was good. The geographic distribution of home mortgage loans was good, small business was excellent, and small farm loans was very poor.

Home Mortgage Loans

During the evaluation period, the geographic distribution of the bank's home mortgage lending was good.

Refer to Table O in the Evansville IN-KY MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

During the 2018 analysis period, the performance was excellent. The proportion of loans was below the percentage of owner-occupied housing units in low-income CTs and exceeded the percentage of owner-occupied housing units in moderate-income CTs. The proportion of loans exceeded the aggregate distribution in LMI CTs.

During the 2017 analysis period, the performance was good. The proportion of loans was below the percentage of owner-occupied housing units in low-income CTs and was near to the percentage in moderate-income CTs. The proportion of loans exceeded the aggregate distribution in low-income CTs and was near to the aggregate distribution in moderate-income CTs.

Performance in the 2016 analysis period was good. The proportion of loans was below the percentage of owner-occupied housing units in low-income CTs and exceeded the percentage in moderate-income CTs. The proportion of loans exceeded the aggregate distribution in low-income CTs and was near to the aggregate distribution in moderate-income CTs.

Refer to Table O in the Evansville IN-KY MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Small Loans to Businesses

The geographic distribution of small loans to businesses was excellent.

Refer to Table Q in the MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

During the 2018 analysis, the geographic distribution of small loans to businesses in LMI CTs was excellent. The proportion of loans exceeded both the percentages of businesses in low-income areas and the aggregate distribution of loans in those areas. The proportion of small loans to businesses in moderate-income CTs was near to both the percentage of businesses in those areas and the aggregate distribution of loans in those areas.

During the 2017 analysis period, the performance was excellent as the bank's lending was near to the percentage of businesses and to the aggregate distribution of lending in low-income CTs. The bank's lending exceeded the percentage of businesses and the aggregate distribution of lending in moderate-income CTs.

During the 2016 analysis period, the performance was excellent. The bank's lending exceeded the percentage of businesses and to the aggregate distribution in low-income CTs. The bank's lending in moderate-income CTs equaled the percentage of businesses and exceeded the aggregate distribution of lending.

Small Loans to Farms

Refer to Table S in the MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of the bank's originations and purchases of small loans to farms was very poor and based on the performance in 2017.

During the 2016 and 2018 analysis periods, the bank did not originate or purchase a sufficient volume of at least 20 small loans to farms to perform a meaningful analysis.

During the 2017 analysis period, the distribution of small loans to farms in LMI geographies was significantly below the percentage of farms in LMI CTs, and significantly below the aggregate distribution of loans in those CTs.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed ONB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

During the evaluation period, the overall borrower distribution of loans was good. The borrower distribution of home mortgage loans was good, small business loans was adequate, and small farm loans was good.

Home Mortgage Loans

During the evaluation period, the distribution of the bank's home mortgage lending in was good. We considered the factors discussed in describing the bank's operation in the MMSA above.

Refer to Table P in the Evansville IN-KY MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The high cost of housing during the review period impacted the bank's ability to make home mortgage loans to low-income borrowers. These issues were considered in evaluating the bank's performance in the AA. Because of the cost of housing affecting every institution's ability to make mortgage loans to LMI borrowers, more weight was given to the bank's performance against the aggregate than against the demographic.

The distribution of the bank's home mortgage lending in 2018 analysis period was good. The proportion of loans was significantly below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to low-income families and was near to the aggregate distribution to moderate-income families.

During the 2017 analysis period, the performance was good. The proportion of loans was significantly below the percentage of low-income families and exceeded the percentage in moderate-income families. The proportion of loans exceeded the aggregate distribution in low-income and near to the aggregate distribution to moderate-income families.

During the 2016 analysis period, the performance was good. The proportion of loans was significantly below the percentage of low-income families and exceeded the percentage in moderate-income families. The proportion of loans exceeded the

aggregate distribution in low-income families and was near to the aggregate distribution to moderate-income families.

Small Loans to Businesses

The borrower distribution of the bank's originations and purchases of small loans to businesses was adequate.

Refer to Table R in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

During the 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was poor. The proportion of loans was significantly below the percentage of small businesses and below the aggregate distribution of loans to those businesses.

During the 2016 analysis period, the distribution was good, and 2017 was adequate. The proportion of loans was significantly below the percentage of small businesses for both analysis periods. The proportion of loans exceeded the aggregate in 2016 and was near to the aggregate in 2017.

Small Loans to Farms

The borrower distribution of the bank's originations and purchases of small loans to farms was good.

Refer to Table T in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

During the 2016 and 2018 analysis periods, the bank did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

During the 2017 analysis period, the distribution of the bank's small loans to farms by revenue was good. The proportion of loans was well below the percentage of small farms but exceeded the aggregate distribution of loans to those farm businesses.

Community Development Lending

The bank is a leader in making CD loans, which had a positive impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA and the bank's capacity to address these needs.

Refer to the Number of Loans Table in the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

ONB originated 13 CD loans totaling \$29.8 million, which is equivalent to 10.5 percent of allocated tier 1 capital. CD lending exhibited excellent responsiveness to the credit and community needs in the AA. CD loans supported affordable housing, community services, economic development, and revitalization/stabilization in the AA.

Examples of CD loans originated during the evaluation period include:

- \$5 million construction loan to a nonprofit to develop a 47-unit multifamily apartment complex. The organization provides sustainable affordable housing, supportive services, and promotes community development. The project is in partnership with city funds, Tax Increment Financing (TIF), and a low-income housing tax credit (LIHTC).
- \$2.9 million for two renewals of a line of credit to an organization that provides supportive services, employment programs, and vocational training to individuals with disabilities.
- \$5 million for two renewals of a revolving line of credit for construction of the new nonprofit facility. The nonprofit supports childcare and health community services targeted to LMI individuals. The property is in a TIF district and enterprise zone.

Product Innovation and Flexibility

The bank makes little use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the “Other Performance” section under the Scope of the Evaluation section for additional details regarding other programs.

ONB works in conjunction with the IHCD and the KHC to offer affordable housing assistance programs to first time and other qualified homebuyers. These affordable loan products are offered under each of the agencies respective programs, which may include down payment assistance, closing cost assistance, flexible rate options, and tax credits. ONB leveraged a combination of these programs to originate 15 loans totaling \$1.4 million in the Evansville IN-KY MMSA during the evaluation period.

INVESTMENT TEST

The institution’s performance under the Investment Test in the Evansville IN-KY MMSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Evansville IN-KY MMSA is excellent.

The bank’s level of qualified CD investments and grants, though not in a leadership position, is very responsive to the credit needs of the community. The institution

occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Evansville IN-KY MMSA	8	14,405	237	13,157	245	100.0	27,562	100.0	0	0

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

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

ONB made \$27.6 million in qualified investments within the AA, representing 9.8 percent of tier 1 capital. These investments included \$14.4 million in prior period investments, \$10.4 million in current period investments, and \$2.7 million in grants and in-kind donations.

Investments were primarily centered in one large LIHTC equity investment, totaling \$6.8 million. This investment supports the conversion of a vacant building into an apartment complex with below market rate rents. Investments also include mortgage-backed (MBS) securities, which support housing for LMI borrowers.

Prior period investments include two investments with outstanding book values of \$440,195 as of December 31, 2018. These investments support women and minority-owned businesses and the restoration of an area zoned for redevelopment.

Qualified grants were made to an array of organizations. The organizations supported affordable housing, provided services throughout the community to LMI individuals, helped to revitalize and stabilize LMI areas, and supported economic development. Examples of qualified grants in the AA include:

- \$305,200 to an organization building houses for low-income families.
- \$200,000 to a community service organization providing childcare for low-income families, many of which are below the poverty level.
- \$30,000 to an organization that addresses housing needs through the renovation of houses in urban areas.
- In-kind donation of office space to an organization that helps to fight against homelessness.

SERVICE TEST

The institution's performance under the Service Test in Evansville IN-KY MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Evansville IN-KY MMSA is excellent.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Evansville IN-KY MMSA	100.0	15	100.0	13.3	26.7	33.3	26.7	8.9	19.0	45.3	26.8

The bank's branches are accessible to essentially all portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has 15 branches within the AA, with two branches in low-income CTs and four branches in moderate-income CTs. The percentage of the bank's branches in LMI CTs exceeded the percentage of population living in those CTs.

The bank has 20 deposit-taking ATMs located in the AA, with one in a low-income CT, and five in moderate-income CTs. The percentage of ATMs in LMI CTs is above the level of population in the LMI areas.

Distribution of Branch Openings/Closings					
Branch Openings/Closings					
# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
		Low	Mod	Mid	Upp
0	1	0	0	-1	0

The opening and closing of branches have not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the assessment period, the bank did not open or close any branches in LMI CTs; however, the bank closed one branch in a middle-income CT due to a branch consolidation.

Banking services and hours of operation do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. ONB offers a wide range of traditional deposit and banking products. All branches operate during traditional banking hours, with some offering Saturday hours. ONB has three branches located in moderate-income CTs with Saturday hours of 9:00 a.m. to noon.

The bank complements its traditional service delivery methods with alternative delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

ONB is a leader in providing CD services in the Evansville IN-KY MMSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported numerous CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, ONB employees recorded 10,357 hours of qualified community development services to 216 different CD organizations. Bank personnel reported 4,493 service hours serving on the Board of Directors of organizations and 5,060 service hours using their financial expertise to provide technical assistance to qualified organizations.

ONB provided 593 hours of financial education training to 11,121 LMI adults and school-aged children in the Evansville IN-KY MMSA. Training addresses basic banking functions, budgeting skills, and improving credit scores. School-age children received instruction on financial literacy through programs such as Junior Achievement and proprietary programs, such as ONB Real Life Finance and the Youth Leadership Academy. ONB also developed a financial literacy program for female inmates, the 12 Steps to Financial Success. Both in-house developed programs demonstrate leadership and innovativeness.

Examples of some of these services include:

The 12 Steps to Financial Success Financial Literacy Program - The program was developed in partnership with the Henderson County Detention Center's Substance Abuse Program to help non-violent offenders avoid re-incarceration, the program educates female inmates on money management. The bank was nationally recognized for the program, receiving the American Bankers Association (ABA) Distinguished Service Award in 2015. During the evaluation period, employees provided 254 hours of instruction for 139 classes with up to 60 inmates per class.

The Real-Life Finance - Real Life Finance provides registered Old National Bank employees/instructors to lead these efforts with nonprofits, correctional facilities, businesses and more. The customized curriculum is designed for multiple life stages, from pre-school to adulthood. During the evaluation period, Old National associates volunteered over 970 hours teaching financial empowerment programs to organizations in the Evansville MSA. Examples of these organizations include, the Vanderburgh County Corrections, Stepping Stones, United Way, Boys & Girls Club of Evansville, Habitat for Humanity, Evansville Rescue Mission, Henderson County Detention Center and several LMI schools.

United Way of Southwestern Indiana - The mission of United Way is to improve lives by mobilizing the caring power of communities. Every year the organization confirms that more than 51 percent of the individuals or families benefitting from Old National's contributions are LMI. Several ONB associates volunteered over 830 hours during the evaluation period to support the United Way. Examples of their involvement include board membership, technical expertise with various committees and fundraising support during the annual funding campaigns.

Multistate Metropolitan Statistical Area Rating

Louisville KY-IN MMSA

CRA rating for the Louisville KY-IN MMSA²:	Outstanding
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Adequate responsiveness to credit needs in the AA, considering the number and amount of home mortgage loans and loans to small business in its AAs;
- Adequate geographic distribution of loans in the AA;
- Adequate distribution of loans among individuals of different income levels and businesses of different sizes;
- A relatively high level of CD loans, which had a significantly positive impact on lending performance;
- An excellent level of qualified investments that were responsive to the AAs identified needs;
- Services do not vary in any way that inconveniences portions of the bank's AA, particularly LMI geographies and individuals; and
- A relatively high level of CD services.

Description of Institution's Operations in Louisville KY-IN MMSA

The Louisville KY-IN MMSA is composed of the complete counties of Jefferson (KY) and Clark (IN). The bank's AA has 223 CTs, including 31-low-income; 54-moderate-income; 74-middle-income, 62-upper-income; and two-NA. The AA complies with the regulation and does not arbitrarily exclude any LMI areas. The bank made an adjustment to its operations within the Louisville KY-IN MMSA during this evaluation period as it exited Washington County in June 2018 and entered into Clark County in June 2018.

The bank has five branches within the AA, with one branch in a low-income CT and one in a moderate-income CT. The bank has four deposit-taking ATMs located in the AA, with none in a low-income CT and one in a moderate-income CT.

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

According to FDIC Deposit Market Share data as of June 30, 2018, ONB had \$216 million in deposits with a deposit market share of 1.0 percent. ONB ranked 13th in total deposits out of 32 banks in the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Louisville KY-IN MMSA – 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	223	13.9	24.2	33.2	27.8	0.9
Population by Geography	896,920	10.6	22.0	37.3	29.8	0.4
Housing Units by Geography	400,946	11.0	23.0	37.0	28.6	0.5
Owner-Occupied Units by Geography	228,565	5.0	18.6	39.9	36.4	0.1
Occupied Rental Units by Geography	131,866	18.2	29.2	33.3	18.3	1.0
Vacant Units by Geography	40,515	20.8	27.5	32.0	18.2	1.4
Businesses by Geography	61,383	7.8	17.9	30.4	38.9	4.8
Farms by Geography	1,515	4.0	16.8	39.0	39.3	0.8
Family Distribution by Income Level	221,299	22.6	18.0	19.8	39.6	0.0
Household Distribution by Income Level	360,431	26.0	16.4	17.8	39.8	0.0
Median Family Income MSA - 31140 Louisville/Jefferson County, KY-IN MSA 2018 FFIEC AMFI		\$64,777 \$70,400				
			Median Gross Rent		\$747	
			Families Below Poverty Level		11.3%	
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Scope of Evaluation in Louisville KY-IN MMSA

For the Louisville KY-IN MMSA, we completed a full scope review of Jefferson County (KY) and Clark County (IN). The AA represents 2.7 percent of total bank branches, 1.5 percent of mortgage originations, 1.6 percent of CRA loan originations, and 1.7 percent total bank deposits.

Housing Characteristics

According to the 2010 U.S. Census, 57.0 percent of the total housing units in the AA were owner occupied, and 32.9 percent were rental occupied units.

Additionally, 5.0 percent of all owner-occupied units and 18.2 percent of renter occupied units were in low-income CTs. Furthermore, 10.2 percent of all single family (1-4 unit)

homes and 14.5 percent of multifamily (five plus unit) housing units were in low-income tracts.

Also, 18.6 percent of all owner-occupied units and 29.2 percent of renter occupied units were in moderate-income CTs. Furthermore, 21.8 percent of all single family (1-4 unit) homes and 25.7 percent of multifamily (five plus unit) housing units were in moderate-income tracts.

Vacant units in the AA were 19.2 percent and 12.1 for low- and moderate-income CTs, respectively. The median age of AA housing stock was 66 and 57 years for low- and moderate-income CTs, respectively.

Employment

According to the BLS, the unemployment rate for this AA was 5.0 percent for January 2016, but it dropped to 3.5 percent in December 2018. The national unemployment rate for the U.S. was 4.9 percent in January 2016, and it dropped to 3.9 percent in December 2018. The AA 2018 unemployment rate is lower than the national unemployment rate.

Housing Affordability

Qualifying for a mortgage loan in the AA with an estimated payment of \$1,289, would be a challenge for low-income borrowers, which is based on the following analysis. The 2018 FFIEC AMFI in the AA is \$70,400. The median housing value in the AA is \$167,750 in January 2016 and \$240,050 in December 2018 reflecting a percent change of 43.1 according to Realtor.com data. Assuming a 30-year mortgage with a five percent interest rate, not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$35,200 per year (or less than 50 percent of the 2018 FFIEC AMFI in the AA) could afford a \$163,928 mortgage with a payment of \$880 per month. A moderate-income borrower making \$56,320 per year (or less than 80 percent of the 2018 FFIEC AMFI in the AA) could afford a \$262,285 mortgage with a payment of \$1,408 per month.

Large Employers in the AA

AA large employers include the following: Kentucky One Health; Yum! Brands; Papa John International; Brown-Forman; Anthem; Kindred Healthcare; Roman Catholic Archdiocese of Louisville; and KU Energy.

Community Contacts

The OCC conducted two community contacts in the AA, which included a local Chamber of Commerce and an Economic Development organization, which reported the following identified needs within this community:

- Mortgages for LMI
- Financial Literacy programs
- Small business loans for start-ups
- Small dollar loans for small, locally based, businesses

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISVILLE KY-IN MMSA

LENDING TEST

The bank's performance under the Lending Test in Louisville KY-IN MMSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Louisville KY-IN MMSA is good. We considered the factors discussed in describing the bank's operation in the section above.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs, considering the number and amount of home mortgage, small business, and small farm loans in the AA. We considered the lending volume in the AA relative to its capacity based on deposits, competition, and market presence.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Louisville KY-IN MMSA	319	180	2	4	505

Dollar Volume of Loans (\$000's)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Louisville KY-IN MMSA	\$85,712	\$46,900	\$355	\$142,360	\$275,327

According to 2018 peer mortgage data, ONB ranked in the top 14 percent of lenders, 54th out of 400 lenders, originating home mortgage loans in the AA. The bank's market share of 0.4 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest mortgage lenders have captured 25.1 percent of the market. The top five mortgage lenders are: Republic Bank and Trust Company with a market share of 5.8 percent; PNC Bank National Association with a market share of 5.7 percent; Century Mortgage Association with a market share of 5.0 percent; Wells Fargo Bank, National Association with a market share of 4.6 percent; and Commonwealth Bank and Trust Company with a market share 4.0.

According to 2017 peer small business data, ONB ranked 22nd out of 103 lenders originating small business loans in the AA. The bank's market share of 0.4 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest small business lenders have captured 59.2 percent of the market. The top five small business lenders are: PNC Bank N.A. with a market share of 18.9 percent; American Express, FSB with a market share of 17.6 percent; Chase Bank USA, NA with a market share of 10.5 percent; Citibank, NA with a market share of 6.2 percent; and Stock Yards Bank; and Trust Company with a market share of 6.0 percent.

Distribution of Loans by Income Level of the Geography

During the evaluation period, the bank's overall geographic distribution of loans is adequate. The geographic distribution of home mortgage loans and small business loans was adequate.

Home Mortgage Loans

During the evaluation period, the distribution of the bank's home mortgage lending was adequate.

Refer to Table O in the Louisville KY-IN MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

During the 2018 analysis period, the performance was very poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in LMI CTs. The proportion of loans was well below the aggregate distribution in LMI CTs.

During the 2017 analysis period, the performance was adequate. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income CTs and was near to the percentage in moderate-income CTs. The proportion of loans was significantly below the aggregate distribution in low-income CTs and exceeded the aggregate distribution in moderate-income CTs.

During the 2016 analysis period, the performance was good. The proportion of loans was below the percentage of owner-occupied housing units in low-income CTs and exceeded the percentage of owner-occupied housing units in moderate-income CTs. The proportion of loans was below the aggregate distribution in low-income CTs and exceeded the aggregate distribution in moderate-income CTs.

Small Loans to Businesses

The geographic distribution of the bank's originations and purchases of small loans to businesses was adequate.

Refer to Table Q in the MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

During the 2018 analysis period, the distribution of small loans to businesses in LMI CTs was adequate. The proportion of loans exceeded the percentage of businesses in low-income CTs and was significantly below the percentage of businesses in moderate-income CTs. The proportion of small loans to businesses in low-income CTs exceeded the aggregate distribution of loans in those CTs and was significantly below the distribution of loans in moderate-income CTs.

During the 2017 analysis period, performance was adequate and consistent with the performance in 2018.

During the 2016 analysis period, performance was excellent. The proportion of small loans to businesses exceeded the percentage of businesses and the aggregate in LMI CTs.

Small Loans to Farms

Small loans to farms were not a primary loan product in the state. The bank did not originate or purchase a sufficient volume of small farm loans during any analysis period to enable a meaningful analysis of the bank's performance in the rating area.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed ONB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

During the evaluation period, the overall borrower distribution of loans was adequate. The borrower distribution of home mortgage loans was adequate and small business loans was poor.

Home Mortgage Loans

The distribution of the bank's home mortgage loans to LMI borrowers was adequate.

Refer to Table P in the Louisville KY-IN MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The high cost of housing during the review period significantly impacted the bank's ability to make home mortgage loans to low-income borrowers. These issues were considered in evaluating the bank's performance in the AA.

The distribution of the bank's home mortgage lending in 2018 was poor. The proportion of loans was well below the percentage of low-income families and near to the percentage of moderate-income families. The proportion of loans was significantly below the aggregate distribution of loans to low-income families and was well below the aggregate distribution to moderate-income families.

During the 2017 analysis period, the performance was adequate. The proportion of loans was well below the percentage of low-income families and near to the percentage of moderate-income families. The proportion of loans was below the aggregate distribution of loans to low-income families and was well below the aggregate distribution to moderate-income families.

During the 2016 analysis period, the performance was good. The proportion of loans was well below the percentage of low-income families and near to the percentage of moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to low-income families and was near to the aggregate distribution to moderate-income families.

Small Loans to Businesses

The borrower distribution of the bank's originations and purchases of small loans to businesses was poor.

Refer to Table R in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

During the 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was poor. The proportion of loans was significantly below the percentage of small businesses and well below the aggregate distribution of loans to those businesses.

During the 2016 and 2017 analysis periods, the performance was poor and consistent with the performance in 2018.

Small Loans to Farms

Small loans to farms were not a primary loan product in the state. The bank did not originate or purchase a sufficient volume of small farm loans during each analysis period to enable a meaningful analysis of the bank's performance in the rating area

Community Development Lending

The bank is a leader in making CD loans, which had a significantly positive impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA and the bank's capacity to address these needs.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

ONB originated four CD loans totaling \$142.4 million, representing 491.2 percent of allocated tier 1 capital. CD loans exhibited an excellent responsiveness to the credit and community needs in the AA. CD Loans supported economic development and revitalization/stabilization in the AA.

Examples of CD loans originated during the evaluation period include:

- A \$25.5 million participation loan with ONB's portion of \$18.5 million to be used for working capital to support operations of a Commerce Center, which is a commercial and industrial park. The Commerce Center has facilities, which are contributing to the Urban Enterprise Zone (UEZ) with additional facilities also contributing to the TIF District. The Commerce Center is anchored by a 1 million square foot distribution facility. The project has helped create and sustain 16 thousand regional jobs.
- \$48.6 million construction line of credit to support a pediatrics medical office facility, located in a TIF District. The new office building stabilized the area by retaining and creating jobs for residents and supporting entities that employ and serve LMI individuals.
- A \$106 million participation loan with ONB's portion of \$63.5 million to be used for an 18-acre health and wellness campus and in a TIF district. The project provided community services that target LMI people and further stabilize the geography by retaining and creating jobs for residents.

Product Innovation and Flexibility

The bank makes little use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the "Other Performance" section under the Scope of the Evaluation section for additional details regarding other programs.

ONB works in conjunction with the IHCD and the KHC to offer affordable housing assistance programs to first time and other qualified homebuyers. These affordable loan products are offered under the agency's programs, which may include down payment assistance, closing cost assistance, flexible rate options, and tax credits. ONB

leveraged these programs to originate two loans totaling \$321 thousand in the Louisville KY-IN MMSA during the evaluation period.

INVESTMENT TEST

The bank's performance under the Investment Test in the Louisville KY-IN MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Louisville KY-IN MMSA is excellent.

The bank has an excellent level of qualified CD investments and grants but not in a leadership position, particularly those that are not routinely provided by private investors. The bank exhibits excellent responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Louisville KY-IN MMSA	1	504	66	3,862	67	100	4,366	100	0	0

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

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

Qualified investments totaled \$4.3 million, which includes current period investments of \$3.6 million; prior period investments of \$504,335, and qualified grants of \$261,250. Investments benefiting the AA during the evaluation represented 15.1 percent of allocated tier 1 capital.

CD Investments are centered in 13 qualifying MBS, totaling \$2.5 million, supporting mortgages to LMI borrowers. ONB also invested \$250,000 in a CDFI providing financial resources for economic development and job creation in low-income CTs in Jefferson County.

ONB's prior period investment is in the Downtown Commercial Loan Fund and has a remaining balance of \$504,335. The fund is an economic development tool to stimulate commercial development in the downtown area, which includes low-income CTs. The fund provides secondary financing assistance offering below-market interest rates and fees and flexible payment terms.

All grants made were to organizations supporting economic development and/or providing services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$35,000 to an economic development organization providing cost-free start-up services and educational programs for new small businesses in the AA.
- \$30,000 to a nonprofit organization providing community services for LMI residents in the AA, particularly assistance for integration of refugees and immigrants.
- \$10,000 to a CDFI providing financial education to low-income micro-enterprise businesses and homeownership loan clients.
- \$10,000 to a nonprofit organization providing financial literacy programs in local schools where 62.3 percent of students participate in the free or reduced lunch programs.
- \$7,500 to an economic development organization providing education, technical assistance, and mentoring for low-income entrepreneurs starting food businesses. The program is in a low-income CT and created 75 jobs during the evaluation period.

SERVICE TEST

The institution's performance under the Service Test in the Louisville KY-IN MMSA is rated Outstanding.

The bank's performance in the Louisville KY-IN MMSA is excellent.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Louisville KY-IN MMSA	100.0	5	100.0	20.0	20.0	0.0	60.0	10.6	22.0	37.3	30.1

The bank's branches are reasonably accessible to significant portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has five branches within the AA, with one branch in a low-income CT and one in a moderate-income CT. The percentage of the bank's branches in low-income CTs exceeds the percentage of population living in those CTs and is near-to the population in moderate-income CTs.

ATM distribution throughout the AA is adequate. The bank has four deposit-taking ATMs located in the AA, with none in a low-income CT, and one in a moderate-income CT. The percentage of ATMs in LMI CTs is below the level of population in the LMI areas.

Distribution of Branch Openings/Closings					
Branch Openings/Closings					
# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
		Low	Mod	Mid	Upp
1	1	0	1	-1	0

The opening and closing of branches have not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the assessment period, the bank opened one branch in a moderate-income CT and closed one branch located in a middle-income CT. The opening of a branch in a moderate-income CT brings various banking products and services to the tract population of 3,271 which is 47 percent of the LMI population in the AA. Total housing units in the CT is 1,579, with 1-4 housing units, owner and renter occupied units of 1,046, 653 and 743, respectively.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours of 9:00 a.m. to noon.

The bank complements its traditional service delivery methods with alternative delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking and online banking. We placed no significant weight on these services, as no data was available to determine its impact on LMI individuals.

Community Development Services

ONB's performance of providing community development services in the Louisville MMSA is excellent.

ONB employees from various lines of business provided technical assistance to 41 different CD organizations totaling 956 hours during the evaluation period. Bank personnel reported 682 service hours serving on the Board of Directors of organizations and 274 service hours using their financial expertise to provide technical assistance to qualified organizations.

ONB personnel also conducted financial literacy training sessions and first-time homebuyer workshops for housing coalitions. Bank employees provided financial literacy instruction to 238 LMI individuals.

Examples of some of these services include:

The Center for Women and Families - The Center for Women and Families helps victims of intimate partner abuse or violence to become survivors through supportive services, community education and cooperative partnerships that foster hope, promote self-sufficiency and rebuild lives. During the evaluation period, an Old National associate served as a board member and assisted with fundraising efforts donating over 200 volunteer hours.

Junior Achievement of Kentuckiana - Junior Achievement (JA) prepares and inspires young people to succeed in the global economy. The organization confirmed the free/reduced rate for students served during the 2015-16 school year was 62.3 percent. In addition to ongoing financial support, ONB participates in the annual JA Job Shadow Program. Participating high school students visit the downtown banking center to learn more about banking industry careers and basic financial education. An employee provides technical assistance by serving on the Board. Also, several associates volunteer to visit local schools to present JA lesson plans and regional executives have served on the Board of Directors.

State Rating

State of Illinois

CRA rating for the State of Illinois:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Needs to Improve
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Adequate responsiveness to credit needs in the AAs, considering the number and amount of home mortgage loans and loans to small businesses in the AAs;
- Good geographic distribution of loans in its AAs;
- Good distribution, particularly in its AAs, of loans among individuals of different income levels and businesses of different sizes;
- Leadership in making CD loans, which had a significantly positive impact on lending performance in the AA;
- A poor level of qualified CD investments and grants;
- Services do not vary in any way that inconveniences portions of the bank's AA, particularly LMI geographies and individuals; and
- A relatively high level of CD services.

Description of Institution's Operations in Illinois

ONB has two AAs within the state of Illinois which are the Danville MSA and Marshall Non-MSA. Illinois represents the smallest rated area by deposits. ONB has \$160 million in deposits representing 1.27 percent of total bank deposits. ONB operates two branches within the state representing 1.06 percent of the total number of bank offices. The bank made 0.35 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the state. The bank's primary loan products in the state of Illinois are home mortgages and small business loans.

Based on FDIC Deposit Market Share data of June 30, 2018, ONB had a 0.03 percent deposit market share in the state and is ranked 120th out of 502 banks doing business in the state. The deposits accounted for 1.27 percent of the bank's total deposits. Primary competitors include JP Morgan Chase Bank, National Association ranked first in deposits with a market share of 18.35 percent, BMO Harris Bank National Association ranked second in deposits with a market share of 10.19 percent, Bank of America,

National Association ranked third in deposits with a market share of 7.14 percent, The Northern Trust Company ranked fourth in deposits with a market share of 5.16 percent, and CIBC Bank USA ranked 5th in deposits with a market share of 3.39 percent.

Scope of Evaluation in Illinois

For the state of Illinois, the Danville MSA received a full-scope review. The AA represents 100 percent of bank branches, 75.4 percent of mortgage originations, 44.4 percent of CRA loan originations, and 100 percent of total bank deposits for the state.

The bank exited the Marshal, IL Non-MSA in 2017. The AA was removed in November 2017 due to a banking center closing, which resulted in ONB exiting the market.

Danville IL MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Danville IL MSA – 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	4.2	20.8	41.7	33.3	0.0
Population by Geography	80,368	4.3	18.6	47.2	29.9	0.0
Housing Units by Geography	36,093	4.1	17.1	47.6	31.2	0.0
Owner-Occupied Units by Geography	21,751	2.8	11.4	49.6	36.2	0.0
Occupied Rental Units by Geography	9,780	7.0	24.7	46.6	21.7	0.0
Vacant Units by Geography	4,562	4.0	28.6	40.0	27.4	0.0
Businesses by Geography	3,338	3.9	22.2	42.8	31.1	0.0
Farms by Geography	331	0.0	3.0	44.1	52.9	0.0
Family Distribution by Income Level	20,188	21.7	16.8	20.7	40.8	0.0
Household Distribution by Income Level	31,531	23.4	16.2	18.3	42.1	0.0
Median Family Income MSA - 19180 Danville, IL MSA		\$53,880				
2018 FFIEC AMFI		\$53,800				
			Median Gross Rent			\$630
			Families Below Poverty Level			14.2%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The ONB AA of Danville, IL MSA consists of Vermilion and Clark counties. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The bank has two branches within the AA, with no branches in a low-income CT, and one branch in a moderate-income CT. The bank has no deposit-taking ATMs located in the AA. The bank's AA has 24 CTs including one-low-income; five-moderate-income; ten-middle-income; and eight-upper-income.

Housing Characteristics

According to the 2010 U.S. Census, 60.2 percent of the total housing units in the AA were owner-occupied, and 27.1 percent were rental occupied units.

Additionally, 2.8 percent of all owner-occupied units and 7.0 percent of renter occupied units were in low-income CTs. Furthermore, 3.4 percent of all single family (1-4 unit) homes and 12.2 percent of multifamily (five plus unit) housing units were in low-income tracts.

Also, 11.4 percent of all owner-occupied units and 24.7 percent of renter occupied units were in moderate-income CTs. Furthermore, 17.6 percent of all single family (1-4 unit) homes and 21.1 percent of multifamily (five plus unit) housing units were in moderate-income tracts.

Vacant units in the AA were 12.4 and 21.1 percent for low- and moderate-income CTs, respectively. The median age of AA housing stock was 69 and 79 years for low- and moderate- income CTs, respectively.

Employment

According to the BLS, the unemployment rate for this AA was 9.1 percent for January 2016 but it dropped to a level of 6.7 percent for December 2018. The national unemployment rate for the US was 4.9 percent for January 2016, and it dropped to 3.9 percent for December 2018. The AA 2018 rate is higher than the national unemployment rate. The AA is still in a slight recession. The three main manufacturing segments of plastics, motor vehicle parts, and grain and oilseed are subject to retaliatory export tariffs from China; these segments make up more than half of all manufacturing jobs in the AA.

Housing Affordability

Qualifying for a mortgage loan in the AA with an estimated payment of \$407, would not be a challenge for low- or moderate-income borrowers, which is based on the following analysis. The 2018 FFIEC AMFI in the AA is \$53,800. The median housing value in the AA is \$65,850 in January 2016 and \$75,950 in December 2018 reflecting a percent change of 15.3 from January 2016 to December 2018 according to Realtor.com data.

Assuming a 30-year mortgage with a five percent interest rate, not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$29,150 per year (or less than 50 percent of the 2018 FFIEC AMFI in the AA) could afford a \$135,753 mortgage with a payment of \$729 per month. A moderate-income borrower making \$46,640 per year (or less than 80 percent of the 2018 FFIEC AMFI in the AA) could afford a \$217,204 mortgage with a payment of \$1,166 per month.

Large Employers in the AA

AA large employers include the following: Department of Veterans Affairs Iliana Health Care System; ThyssenKrupp Co.; McLane Midwest Co Inc.; Blue Cross/Blue Shield of Illinois; KIK Custom Products; Quaker Foods and Beverages; Presence Health United Samaritans Medical Center; and AutoZone.

Community Contacts

The OCC conducted three community contacts in the AA. The community contacts included a local Habitat for Humanity, a local Housing Authority Office and a local Economic Development Office, which reported the following identified needs within this community:

- Affordable Housing for LMI residents, which help with down-payment and closing costs
- Financial Literacy programs
- Small business lending to include start-up businesses
- Housing related grants for the LMI residents and areas

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

The bank's performance under the Lending Test in the state of Illinois is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Danville MSA is good. We considered the factors discussed in describing the bank's operation in the state above.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs, considering the number and amount of home mortgage, small business, and small farm loans in the AA. We considered the lending volume in the AA relative to its capacity based on deposits, competition, and market presence.

ONB's presence in this AA was very limited with two branches as the bank exited the Marshal, IL Non-MSA in 2017. Furthermore, the bank's lending competition is very strong within this AA with less than a significant market share and rank.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans*	% State Deposits
Danville MSA	89	50	5	5	149	68.0%	100.0%
Illinois Non-MSA	19	25	25	1	70	32.0%	0.0%
*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.							

Dollar Volume of Loans (\$000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans*	% State Deposits
Danville MSA 19180	\$4,004	\$8,149	\$231	\$21,750	\$34,134	69.0%	100.0%
Illinois Non-MSA	\$1,718	\$6,338	\$2,775	\$4,512	\$15,343	31.0%	0.0%
*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.							

Danville MSA

According to FDIC Deposit Market Share data as of June 30, 2018, ONB had \$160.4 million in deposits with a deposit market share of 13.6 percent. ONB ranked fourth in total deposits out of 16 banks in the AA. ONB's deposit market share ranked in the top 25.0 percent for all deposit taking institutions in the AA.

According to 2018 peer mortgage data, ONB ranked in the top eight percent of lenders, 10th out of 130 lenders, originating home mortgage loans in the AA. The bank's market share of 2.2 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest mortgage lenders have captured 41.4 percent of the market. The five largest mortgage lenders are: Catlin Bank with a market share of 15.4 percent; Iroquois Federal Savings and Loan with a market share of 7.3 percent; Vibrant Credit Union with a market share of 6.9 percent; First Financial Bank, National Association with a market share of 6.4 percent, and Amerifirst Financial Corporation with a market share of 5.4 percent.

According to 2017 peer small business data, ONB ranked 10th out of 40 lenders originating small business loans in the AA. The bank's market share of 3.1 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five

largest small business lenders have captured 56.8 percent of the market. The five largest small business lenders are: American Express, FSB with a market share of 15.6 percent; Capital One Bank (USA), NA with a market share of 11.8 percent; First Financial Bank, NA with a market share of 11.6 percent; Synchrony Bank with a market share of 9.5 percent; and Chase Bank USA, NA with a market share of 8.3 percent.

Distribution of Loans by Income Level of the Geography

During the evaluation period, the overall geographic distribution of loans was good. The geographic distribution of home mortgage loans was adequate and small business loans was excellent.

Home Mortgage Loans

During the evaluation period, the distribution of the bank's home mortgage lending was adequate.

Refer to Table O 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.

The geographic distribution of the bank's home mortgage lending in 2018 was very poor. The bank did not make any loans in LMI CTs during the 2018 analysis period. The proportion of loans was significantly below the percentage of owner-occupied housing units in LMI CTs. The proportion of loans was significantly below the aggregate distribution in LMI CTs.

During the 2017 analysis period, the performance was excellent. The proportion of loans exceeded the percentage of owner-occupied housing units in low-income CTs and was below the percentage in moderate-income CTs. The proportion of loans exceeded the aggregate distribution in LMI CTs.

During the 2016 analysis period, the performance was adequate. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income CTs and exceeded the percentage in moderate-income CTs. The proportion of loans was significantly below the aggregate distribution in low-income CTs and was near to the aggregate distribution in moderate-income CTs.

Small Loans to Businesses

The geographic distribution of the bank's originations and purchases of small loans to businesses was excellent and based on the performance in 2016.

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

During the 2017 and 2018 analysis periods, the bank did not originate or purchase a sufficient volume of small loans to businesses to perform a meaningful analysis.

During 2016, the distribution of small loans to businesses in LMI CTs was excellent. The proportion of loans exceeded the percentage of businesses in low-income CTs and exceeded the percentage of businesses in moderate-income CTs. The proportion of small loans to businesses in low-income CTs exceeded the aggregate distribution of loans in those CTs and exceeded the distribution of loans in moderate-income CTs.

Small Loans to Farms

Small loans to farms were not a primary loan product in the state. The bank did not originate or purchase a sufficient volume of small farm loans during each analysis period to enable a meaningful analysis of the bank's performance in the rating area.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed ONB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

During the evaluation period, the overall borrower distribution of loans was excellent. The borrower distribution of home mortgage loans was excellent and small business loans was adequate.

Home Mortgage Loans

The distribution of the bank's home mortgage loans to LMI borrowers was excellent.

Refer to Table P 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.

During the 2018 analysis period, the proportion of loans was below the percentage of LMI families. The proportion of loans exceeded the aggregate distribution of loans to low-income families and was near to the aggregate distribution to moderate-income families.

During the 2016 and 2017 analysis periods, the performance was excellent. The proportion of loans was near to the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to LMI families.

Small Loans to Businesses

The borrower distribution of the bank's originations and purchases of small loans to businesses was adequate and based on the performance in 2016.

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

During the 2017 and 2018 analysis periods, the bank did not originate or purchase a sufficient volume of small loans to businesses to perform a meaningful analysis.

The bank was able to make some small business loans in this AA, 19 for 2017 and eight for 2018, which were below the level of 20 loans per AA to perform a meaningful analysis. For 2016, the bank originated 23 small business loans. As stated previously, the lack of presence and competition limited the level of lending in this AA after 2016.

During the 2016 analysis period, the distribution of the bank's small loans to businesses by revenue was adequate. The proportion of loans was well below the percentage of small businesses and near to the aggregate distribution of loans to those businesses

Small Loans to Farms

Small loans to farms were not a primary loan product in the state. The bank did not originate or purchase a sufficient volume of small farm loans during each analysis period to enable a meaningful analysis of the bank's performance in the rating area.

Community Development Lending

The bank is a leader in making CD loans, which had a significantly positive impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Danville MSA

ONB originated five CD loans totaling \$21.8 million, representing 101.4 percent of allocated tier 1 capital. CD loans originated exhibited excellent responsiveness to the credit and community needs in the AA. Loans supported community services to LMI people and revitalization/stabilization initiatives in the AA.

Examples of CD loans originated during the evaluation period include:

- \$17.3 million to a corporation in three loans, which consists of a purchase of a facility for business expansion purposes and two renewals of revolving lines of credit for working capital to support operations. The company received grants from the City of Danville to assist with the relocation and expansion costs. The loan has helped stabilize a moderate-income CT within the AA by enabling a major employer to create 450 jobs.
- \$1.3 million line of credit for working capital to a nonprofit that distributes food to approximately 500 families monthly.

State of Illinois

In addition, ONB originated two CD loans totaling \$46.3 million. Loans supported economic development and revitalization/stabilization in the AA. The loans were considered impactful to the state and had a positive impact on lending performance in the rating area.

Product Innovation and Flexibility

The bank made no use of innovative and/or flexible lending practices in order to serve AA credit needs during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance in the Illinois Non-MSA is weaker than the bank's overall High Satisfactory performance rating under the Lending Test in the state of Illinois. The performance is weaker due to the minimal level of HMDA and CRA loans originated or purchased within the AA coupled with minimal presence in this AA with two branches. CD lending performance was consistent with the bank's performance in the state of Illinois.

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

INVESTMENT TEST

The bank's performance under the Investment Test in Illinois is rated Needs to Improve. ONB made 19 investments, totaling \$229,670, in Illinois. This represents 1.1 percent of allocated tier 1 capital in the state.

Assessment Area	Qualified Investments								
	Prior Period*		Current Period		Total				Unfunded Commitments*
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#
Danville MSA	0	0	17	217	17	89.5	217	94.8	0
Marshall IL Non-MSA	0	0	2	12	2	10.5	12	5.2	0

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

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Danville MSA is poor.

The bank has a poor level of qualified CD investments and grants and was not in a leadership position, particularly those that are not routinely provided by private investors. The bank exhibits poor responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$217 thousand, with current period investments of \$121 thousand and qualified grants of \$96 thousand. Investments benefiting the AA during the evaluation represented 1.1 percent of allocated tier 1 capital. There were no unfunded commitments at the end of the evaluation period. Investments are primarily centered in a CRA qualified investment bond fund for \$121.1 thousand supporting affordable housing in the AA.

All grants made were to organizations supporting economic development and/or providing services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$41,045 to an economic development organization that has facilitated business development and job creation in the AA.
- \$24,500 in computer equipment donated to three community service organizations benefiting LMI individuals in the AA.

- \$15,500 to a nonprofit organization that provides funding to other community service organizations benefiting LMI individuals and families in the AA.
- \$10,000 to a community service organization benefiting local schools, where 84 percent of students participate in the free or reduced lunch programs. The funds provided computer equipment for the school.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Illinois Non-MSA is weaker than the bank's performance under the Investment Test in the full-scope area due to the lower level of investments. The level of competition was very strong from other regional banks for loans as well as AA investments and services. ONB operates two branches within this AA.

SERVICE TEST

The bank's performance under the Service Test in Illinois is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Danville MSA is good.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Danville MSA	100.0	2	100.0	0.0	50.0	0.0	50.0	4.3	18.6	47.2	29.9

The bank's branches are reasonably accessible to significant portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has two branches within the AA, with no branches in a low-income CT and one branch in a moderate-income CT. The percentage of the bank's branches in LI CTs is below and in MI CTs exceed the percentage of population living in those CTs.

The opening and closing of branches have not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the assessment period, the bank did not open or close any branches in the Danville MSA.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Danville MSA	0	0	0	0	0	0

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours of 9:00 a.m. to noon.

The bank complements its traditional service delivery methods with certain alternative delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine the impact on LMI individuals.

Community Development Services

ONB's performance of providing community development services in the Danville MSA is excellent given the limited presence and staff the bank has in the AA.

During the evaluation period, ONB employees recorded 218 hours of qualified community development services to 11 different CD organizations. ONB personnel conducted financial literacy training sessions and first-time homebuyer workshops for housing coalitions. There were only two offices with a limited staff of 18 employees. Bank employees provided 18 service hours of financial literacy education to 42 low- and moderate -income individuals. In addition, bank personnel reported 188 service hours serving on the Board of Directors of organizations and 12 service hours using their financial expertise to provide technical assistance to qualified organizations.

Examples of some of these services include:

Danville Area Community College (DACC) - An employee served on the board of directors volunteering over 50 hours to DACC, a community college in Danville, Illinois. DACC has approximately 78 percent of the student body enrolled in eligible Student Financial Assistance and receive some type of financial assistance each year.

CRIS Senior Services - Located in a moderate-income CT in the MSA, the mission of this nonprofit organization is to keep older adults independent in their own homes for as long as possible. Participating seniors are generally LMI individuals living on fixed incomes. During the evaluation period, an ONB associate volunteered 34 hours to assist with account balancing and to provide advice on money management strategies.

Conclusions for Area Receiving a Limited-Scope Review

Based on limited-scope reviews, the bank's performance in the Illinois Non-MSA is weaker than the full scope AA since the branch closed in 2017.

State Rating

State of Indiana

CRA rating for the State of Indiana:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Adequate responsiveness to credit needs in its AAs, considering the number and amount of home mortgage loans and loans to small businesses in its AAs;
- Good geographic distribution of loans in its AAs;
- Excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes;
- A relatively high level of CD loans, which had a positive impact on lending performance;
- An excellent level of qualified CD investments and grants;
- Services do not vary in any way that inconveniences portions of the bank's AA, particularly LMI geographies and individuals; and
- A relatively high level of CD services.

Description of Institution's Operations in Indiana

ONB has ten AAs within the state of Indiana which are the Bloomington MSA, Columbus MSA, Elkhart-Goshen MSA, Fort Wayne MSA, Indianapolis-Carmel-Anderson MSA, Lafayette-West Lafayette MSA, Muncie MSA, South Bend-Mishawaka MSA, Terre Haute MSA, and Indiana Non-MSA. Indiana represents the largest rated area by deposits. ONB has \$5 billion in deposits representing 39.6 percent of the total bank deposits. ONB operates seventy-three branches within the state representing 38.6 percent of the total number of bank offices. The bank made 40.3 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the state. The bank's primary loan products in the state of Indiana are home mortgages and small business loans.

Based on FDIC Deposit Market Share data of June 30, 2018, ONB had a 5.3 percent deposit market share in the state and is ranked fourth out of 145 banks doing business in the state. The deposits accounted for 39.6 percent of the bank's total deposits.

Primary competitors include JP Morgan Chase Bank, National Association ranked first in deposits with a market share of 14.5 percent, PNC Bank, National Association ranked second in deposits with a market share of 8.6 percent, Fifth Third Bank ranked third in deposits with a market share of 6.7 percent, and First Merchants Bank ranked fifth in deposits with a market share of 5.1 percent.

Scope of Evaluation in Indiana

For the state of Indiana, the Bloomington MSA, Indiana-Carmel-Anderson MSA, Muncie MSA and Indiana Non-MSA received full scope reviews.

Bloomington MSA: The AA represents 6.9 percent of total bank branches, 9.1 percent of mortgage originations, 5.9 percent of CRA loan originations, and 13.8 percent of total bank deposits in the state.

Indianapolis-Carmel-Anderson MSA: The AA represents 47.4 percent of total bank branches, 26.7 percent of mortgage originations, 24.7 percent of CRA loan originations, and 22.5 percent of total bank deposits in the state.

Muncie MSA: The AA represents 6.9 percent of total bank branches, 6.0 percent of mortgage originations, 3.9 percent of CRA loan originations, and 3.7 percent of total bank deposits in the state.

Indiana Non-MSA: The AA represents 10.6 percent of total bank branches, 8.9 percent of mortgage originations, 18.2 percent of CRA loan originations and 11.8 percent of total bank deposits of the state.

Bloomington IN MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Bloomington IN MSA – 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	9.7	16.1	35.5	35.5	3.2
Population by Geography	142,404	9.7	18.5	34.8	32.4	4.6
Housing Units by Geography	59,808	6.4	21.5	37.3	34.7	0.1
Owner-Occupied Units by Geography	29,050	3.1	7.6	44.8	44.4	0.0
Occupied Rental Units by Geography	25,115	10.0	37.1	28.4	24.3	0.1
Vacant Units by Geography	5,643	7.5	23.2	38.2	31.1	0.0
Businesses by Geography	7,966	5.9	21.3	35.3	35.5	2.0
Farms by Geography	221	1.8	5.9	52.9	39.4	0.0
Family Distribution by Income Level	27,809	22.2	15.8	19.5	42.5	0.0
Household Distribution by Income Level	54,165	28.1	14.1	15.2	42.7	0.0
Median Family Income MSA - 14020 Bloomington, IN MSA		\$61,426				
2018 FFIEC AMFI		\$73,900				
			Median Gross Rent			\$854
			Families Below Poverty Level			11.9%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The ONB AA of Bloomington, IN MSA consists of Monroe County. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The bank has 15 branches within the AA, with two branches in low-income CTs and four branches in moderate-income CTs. The bank has 20 deposit-taking ATMs located in the AA, with one in a low-income CT and five in moderate-income CTs.

According to FDIC Deposit Market Share data as of June 30, 2018, ONB had \$692.9 million in deposits with a deposit market share of 27.2 percent. ONB ranked second in total deposits out of 13 banks in the AA.

The bank's AA has 31 CTs which include three low-income; five moderate-income; eleven middle-income; eleven upper-income; and one NA.

Housing Characteristics

According to the 2010 U.S. Census, 48.6 percent of the total housing units in the AA were owner-occupied, and 41.9 percent were rental occupied units.

Additionally, 3.14 percent of all owner-occupied units and 10.0 percent of renter occupied units were in low-income CTs. Furthermore, 5.8 percent of all single family (1-4 unit) homes and 7.2 percent of multifamily (five plus unit) housing units were in low-income tracts.

Also, 7.6 percent of all owner-occupied units and 37.2 percent of renter occupied units were in moderate-income CTs. Furthermore, 12.6 percent of all single family (1-4 unit) homes and 45.0 percent of multifamily (five plus unit) housing units were in moderate-income tracts.

Vacant units in the AA were 10.9 and 10.2 percent for low- and moderate-income CTs, respectively. The median age of AA housing stock was 46 and 32 years for low- and moderate- income CTs, respectively.

Employment

According to the BLS, the unemployment rate for this AA was 5.4 percent for January 2016, but it dropped to 3.4 percent as of December 2018. The national unemployment rate for the US was 4.9 percent in January 2016, and it dropped to 3.9 percent as of December 2018. The AA 2018 rate was lower than the national unemployment rate.

Housing Affordability

Qualifying for a mortgage loan in the AA with an estimated payment of \$1,449, would be a challenge for low-income borrowers, based on the following analysis. The 2018 FFIEC AMFI in the AA is \$73,900. The median housing value in the AA is \$166,850 in January 2016 and \$269,950 in December 2018, reflecting a percent change of 61.8 from January 2016 to December 2018 according to Realtor.com data. Assuming a 30-year mortgage with a five percent interest rate, not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$36,950 per year (or less than 50 percent of the 2018 FFIEC AMFI in the AA) could afford a \$172,077 mortgage with a payment of \$924 per month. A moderate-income borrower making \$59,120 per year (or less than 80 percent of the 2018 FFIEC AMFI in the AA) could afford a \$275,324 mortgage with a payment of \$1,478 per month.

Large Employers in the AA

AA large employers include the following: Indiana University; Cook Medical Inc.; Indiana University Health Bloomington; The Kroger Co., Baxter International Inc.; Catalent Pharma Solutions; Ivy Tech Community College; and Crider & Crider Inc.

Community Contacts

The OCC conducted one community contact in the AA. The community contact was a local Economic Development Office, which reported the following identified needs within this community:

- Affordable Housing for LMI residents
- Financial Literacy programs
- Small dollar business loans

Muncie IN MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Muncie IN MSA – 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	30	13.3	30.0	26.7	23.3	6.7
Population by Geography	117,335	5.7	25.0	27.3	33.8	8.2
Housing Units by Geography	52,348	8.0	27.7	28.5	32.5	3.3
Owner-Occupied Units by Geography	29,208	3.8	21.6	30.3	43.5	0.8
Occupied Rental Units by Geography	16,553	10.9	36.1	26.8	18.6	7.6
Vacant Units by Geography	6,587	19.4	33.7	24.7	18.6	3.6
Businesses by Geography	5,714	5.4	29.5	28.4	32.0	4.7
Farms by Geography	262	0.8	10.3	40.1	48.9	0.0
Family Distribution by Income Level	27,584	21.7	16.8	20.8	40.7	0.0
Household Distribution by Income Level	45,761	25.4	14.4	18.4	41.8	0.0
Median Family Income MSA - 34620 Muncie, IN MSA		\$51,935				
2018 FFIEC AMFI		\$58,200				
			Median Gross Rent			\$694
			Families Below Poverty Level			13.0%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The ONB AA of Muncie, IN MSA consists of Delaware County. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The bank has four branches located within the AA with none located within a low-income CT and one within a moderate-income CT. The bank has two deposit-taking ATMs located in the AA, with no ATMs in LMI CTs. The bank's AA has 30 CTs, which are: four low-income, nine moderate-income, eight middle-income, seven upper-income, and two NA.

Housing Characteristics

According to the 2010 U.S. Census, 55.8 percent of the total housing units in the AA were owner-occupied, and 31.6 percent were rental occupied units.

Additionally, 3.8 percent of all owner-occupied units and 10.9 percent of renter occupied units were in low-income CTs. Furthermore, 7.9 percent of all single family (1-4 unit) homes and 11.2 percent of multifamily (five plus unit) housing units were in low-income tracts.

Also, 21.6 percent of all owner-occupied units and 36.1 percent of renter occupied units were in moderate-income CTs. Furthermore, 25.9 percent of all single family (1-4 unit) homes and 31.0 percent of multifamily (five plus unit) housing units were in moderate-income tracts.

Vacant units in the AA were 30.4 and 15.3 percent for low- and moderate-income CTs, respectively. The median age of AA housing stock was 67 and 62 years for low- and moderate-income CTs, respectively.

Employment

According to the BLS, the unemployment rate for this AA was 5.9 percent for January 2016, but it dropped to 3.9 percent for December 2018. The national unemployment rate for the US was 4.9 percent for January 2016 and it dropped to 3.9 percent for December 2018. The AA 2018 rate was equal to the national unemployment rate.

Housing Affordability

Qualifying for a mortgage loan in the AA with an estimated payment of \$429 per month would not be a challenge for LMI borrowers, which is based on the following analysis. The 2018 FFIEC AMFI in the AA is \$58,200. The median housing value in the AA is \$70,050 in January 2016 and \$79,950 in December 2018 reflecting a percent change of 14.1 from January 2016 to December 2018 according to Realtor.com data. Assuming a 30-year mortgage with a five percent interest rate, not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$29,100 per year (or less than 50 percent of the 2018 FFIEC AMFI in the AA) could afford a \$135,520 mortgage with a payment of \$728 per month. A moderate-income borrower making \$46,560 per year (or less than 80 percent of the 2018 FFIEC AMFI in the AA) could afford a \$216,831 mortgage with a payment of \$1,164 per month.

Large Employers in the AA

AA large employers include the following: IU Health BMH; Cardinal Health Systems; Ball State University; Global Foundries; Sallie Mae; Navient; Meridian Services; and Wal-Mart Stores.

Community Contacts

The OCC conducted one community contact in the AA. The community contact was a local Chamber of Commerce, which reported the following identified needs within this community:

- Affordable Housing for LMI residents
- First-time homeowner programs
- Financial Literacy programs

Indianapolis-Carmel-Anderson IN MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Indianapolis-Carmel-Anderson IN MSA – 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	360	18.1	27.8	30.6	23.1	0.6
Population by Geography	1,750,491	11.7	23.7	31.5	32.8	0.3
Housing Units by Geography	746,856	13.4	25.9	30.5	30.0	0.2
Owner-Occupied Units by Geography	425,809	6.8	18.4	35.4	39.4	0.1
Occupied Rental Units by Geography	240,771	20.3	36.6	24.5	18.4	0.2
Vacant Units by Geography	80,276	28.2	33.5	22.6	15.3	0.4
Businesses by Geography	114,644	8.8	19.9	31.9	39.2	0.1
Farms by Geography	3,408	4.4	13.4	47.4	34.7	0.1
Family Distribution by Income Level	429,083	22.3	17.3	19.2	41.2	0.0
Household Distribution by Income Level	666,580	24.2	16.4	17.6	41.8	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA 2018 FFIEC AMFI		\$66,803 \$75,100				
			Median Gross Rent			\$830
			Families Below Poverty Level			11.0%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The ONB AA Indianapolis-Carmel-Anderson MSA consists of the following counties: Boone, Hamilton, Hendricks, Johnson, Madison, Marion and Putnam. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The bank has 22 branches located within the AA, and none are located within a low-income CT; however, six branches are located within moderate-income CTs. The bank has 23 deposit-taking ATMs located in the AA, with no ATMs in low-income CTs, and six ATMs in moderate-income CTs.

The bank's AA has 360 CTs including 65 low-income, 100 moderate-income, 110 middle-income, 83 upper-income, and two NA.

Housing Characteristics

According to the 2010 U.S. Census, 57.1 percent of the total housing units in the AA were owner-occupied, and 32.2 percent were rental occupied units.

Additionally, 6.8 percent of all owner-occupied units and 20.3 percent of renter occupied units were in low-income CTs. Furthermore, 13.1 percent of all single family (1-4 unit) homes and 15.7 percent of multifamily (five plus unit) housing units were in low-income tracts.

Also, 18.4 percent of all owner-occupied units and 36.6 percent of renter occupied units were in moderate-income CTs. Furthermore, 22.7 percent of all single family (1-4 unit) homes and 38.4 percent of multifamily (five plus unit) housing units were in moderate-income tracts.

Vacant units in the AA were 22.5 and 13.9 percent for low- and moderate-income CTs, respectively. The median age of AA housing stock was 64 and 50 years for low- and moderate-income CTs, respectively.

Employment

According to the BLS, the unemployment rate for this AA was 4.6 percent for January 2016, but it dropped to 3.1 percent for December 2018. The national unemployment rate for the US was 4.9 percent for January 2016, and it dropped to 3.9 percent for December 2018. The AA 2018 rate was lower than the national unemployment rate.

Housing Affordability

Qualifying for a mortgage loan in the AA with an estimated payment of \$1,261, would be a challenge for low-income borrowers, based on the following analysis. The 2018 FFIEC AMFI in the AA is \$75,100. The median housing value in the AA is \$149,950 in January 2016 and \$235,050 in December 2018 reflecting a percent change of 56.8 from January 2016 to December 2018 according to Realtor.com data. Assuming a 30-year mortgage with a five percent interest rate, not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$37,550 per year (or less than 50 percent of the 2018 FFIEC AMFI in the AA) could afford a \$174,871 mortgage with a payment of \$939 per month. A moderate-income borrower making \$60,080 per year (or less than 80 percent of the 2018 FFIEC AMFI in the AA) could afford a \$279,795 mortgage with a payment of \$1,502 per month.

Large Employers in the AA

AA large employers include the following: Indiana University Health; St Vincent Hospitals and Health Services; Eli Lilly and Company; Community Health Network; Wal-Mart Stores Inc.; The Kroger Co.; Marsh Supermarkets Inc.; and Purdue University.

Community Contacts

The OCC conducted two community contacts in the AA. The two community contacts were a local Community Housing Authority and Economic Development Offices, which reported the following identified needs within this community:

- Affordable Multi-Family Construction Gap Financing
- Micro-Lending for the \$5,000 to \$15,00 range
- Affordable LMI Mortgage programs

Indiana Non-MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Indiana Non-MSA – 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	105	0.0	13.3	69.5	17.1	0.0
Population by Geography	437,993	0.0	10.2	71.1	18.6	0.0
Housing Units by Geography	194,719	0.0	10.5	71.8	17.7	0.0
Owner-Occupied Units by Geography	126,731	0.0	8.2	71.6	20.3	0.0
Occupied Rental Units by Geography	41,561	0.0	16.9	70.1	13.0	0.0
Vacant Units by Geography	26,427	0.0	11.5	76.0	12.5	0.0
Businesses by Geography	23,112	0.0	12.4	69.4	18.2	0.0
Farms by Geography	2,567	0.0	3.1	70.8	26.1	0.0
Family Distribution by Income Level	116,660	17.5	18.2	23.0	41.4	0.0
Household Distribution by Income Level	168,292	21.8	16.4	19.1	42.7	0.0
Median Family Income Non-MSAs – IN		\$55,741	Median Housing Value			\$109,004
2018 FFIEC AMFI		\$67,800				
			Median Gross Rent			\$640
			Families Below Poverty Level			9.8%
Source: 2015 ACS Census and 2018 D&B Data						
Due to rounding, totals may not equal 100.0						
(*) The NA category consists of geographies that have not been assigned an income classification.						

ONB's Indiana Non-MSA AA consists of the following counties: Jackson, Lawrence, Fountain, Dubois, Jefferson, Jennings, Orange, Parke, Perry, Spencer, Knox, Kosciusko, Daviess, Martin, and Randolph. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The bank has 21 branches located within the AA, and five are located within moderate-income CTs. There are no low-income CTs in the AA. The bank has eight deposit-taking ATMs located in the AA, with three ATMs located in moderate-income CTs.

The bank's AA has 105 CTs including 0 low-income, 14 moderate-income, 73 middle-income, and 18 upper-income.

Housing Characteristics

According to the 2010 U.S. Census, 65.1 percent of the total housing units in the AA were owner occupied, and 21.3 percent were rental occupied units.

Additionally, zero percent of all owner-occupied units and zero percent of renter occupied units were in low-income CTs. Furthermore, zero percent of all single family (1-4 unit) homes and zero percent of multifamily (five plus unit) housing units were in low-income tracts.

Also, 8.2 percent of all owner-occupied units and 16.9 percent of renter occupied units were in moderate-income CTs. Furthermore, 9.5 percent of all single family (1-4 unit) homes and 21.5 percent of multifamily (five plus unit) housing units were in moderate-income tracts.

Vacant units in the AA were zero and 14.9 percent for low- and moderate-income CTs, respectively. The median age of AA housing stock was zero and 60 years for low- and moderate- income CTs, respectively.

Employment

According to the BLS, the unemployment rate for this AA was 5.1 percent for January 2016, but it dropped to the level of 3.4 percent for December 2018. The national unemployment rate for the US was 4.9 percent for January 2016 and it dropped to the level of 3.9 percent for December 2018. The AA 2018 rate was lower than the national unemployment rate.

Housing Affordability

Qualifying for a mortgage loan in the AA with an estimated payment of \$777 would not be a challenge for LMI income borrowers based on the following analysis. The 2018 FFIEC AMFI in the AA is \$67,800. The median housing value in the AA is \$122,092 in January 2016 and \$144,761 in December 2018 reflecting a percent change of 18.6 from January 2016 to December 2018 according to Zillow.com data. Assuming a 30-year

mortgage with a five percent interest rate, not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$33,900 per year (or less than 50 percent of the 2018 FFIEC AMFI in the AA) could afford a \$157,874 mortgage with a payment of \$848 per month. A moderate-income borrower making \$54,240 per year (or less than 80 percent of the 2018 FFIEC AMFI in the AA) could afford a \$252,598 mortgage with a payment of \$1,356 per month.

Large Employers in the AA

AA large employers include the following: Cummins; Anthem; Eli Lilly Company; State of Indiana; Indiana University; Berry Global; Purdue University; and Franciscan Health.

Community Contacts

The OCC conducted eight community contacts in the AA. The community contacts included six local Economic Development Offices and two Community Affordable Housing Offices, which reported the following identified needs within this community:

- Affordable Housing for LMI residents
- Financial Literacy programs
- Small business development loans
- USDA Guaranteed Loans
- Small Business Lending for starts-ups

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

LENDING TEST

The bank's performance under the Lending Test in the state of Indiana is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Bloomington, IN MSA, Indianapolis-Carmel-Anderson, IN MSA, Muncie, IN MSA, and Indiana Non-MSA is good. We considered the factors discussed in describing the bank's operation in the state above.

Lending Activity

Based on the tables below, lending levels reflect excellent responsiveness to the credit needs in its AAs considering the number and amount of home mortgage, small

business, small farm, and CD loans originated or purchased relative to its capacity based on deposits, competition, and market presence.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans*	% State Deposits
Bloomington MSA	543	315	6	4	868	7.4%	13.5%
Columbus MSA	231	82	5	1	319	2.7%	3.5%
Elkhart-Goshen MSA	100	133	0	0	233	2.0%	1.7%
Fort Wayne MSA	296	629	1	5	931	7.9%	9.7%
Indiana Non-MSA	1,753	1,116	944	7	3,820	32.5%	31.2%
Indianapolis-Carmel-Anderson MSA	1,587	1,324	25	26	2,962	25.2%	21.9%
Lafayette-West Lafayette MSA	487	259	11	3	760	6.5%	4.9%
Muncie MSA	354	178	34	3	569	4.8%	3.6%
South Bend-Mishawaka IN-MI MSA	258	203	0	1	462	3.9%	2.5%
Terre Haute MSA	516	308	20	1	845	7.2%	7.5%
<i>*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans*	% State Deposits
Bloomington MSA	\$104,325	\$60,884	\$1,377	\$8,440	\$175,026	8.9%	13.5%
Columbus MSA	\$42,682	\$18,961	\$431	\$4,710	\$66,784	3.4%	3.5%
Elkhart-Goshen MSA	\$13,309	\$38,377	\$0	\$0	\$51,686	2.6%	1.7%
Fort Wayne MSA	\$67,732	\$106,107	\$100	\$16,767	\$190,706	9.7%	9.7%
Indiana Non-MSA	\$172,810	\$142,668	\$128,062	\$27,468	\$471,008	23.9%	31.2%
Indianapolis-Carmel-Anderson MSA	\$263,749	\$276,161	\$3,641	\$87,574	\$631,125	32.0%	21.9%
Lafayette-West Lafayette MSA	\$78,095	\$42,393	\$1,540	\$13,260	\$135,288	6.9%	4.9%
Muncie MSA	\$32,888	\$23,388	\$4,982	\$2,825	\$64,083	3.2%	3.6%
South Bend-Mishawaka IN-MI MSA	\$47,826	\$42,171	\$0	\$2,000	\$91,997	4.7%	2.5%
Terre Haute MSA	\$38,334	\$51,691	\$3,153	\$1,035	\$94,213	4.8%	7.5%
*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.							

Bloomington MSA

The bank's lending activity in the AA is excellent.

According to FDIC Deposit Market Share data as of June 30, 2018, ONB had \$693 million in deposits with a deposit market share of 27.18 percent. ONB ranked second in total deposits out of thirteen banks in the AA.

According to 2018 peer mortgage data, ONB ranked in the top two percent of lenders, third out of 208 lenders, originating home mortgage loans in the AA. The bank's market share of 5.6 percent and rank in loans is weaker than the bank's market share and rank in deposits. The remaining four largest mortgage lenders have captured 36.6 percent of the market. The top lenders are Indiana University Credit Union, with a market share of 13.6 percent, Ruoff Mortgage Company, Inc with a market share of 12.5 percent, JP Morgan Chase Bank, National with a market share of 5.4 percent and Wells Fargo Bank National Association with a market share of 5.1 percent.

According to 2017 peer small business data, ONB ranked sixth out of 57 lenders originating small business loans in the AA. The bank's market share of 5.3 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest small business lenders have captured 64.2 percent of the market. The top small business lenders are Chase Bank USA, NA with a market share of 18.4 percent, American Express, FSB with a market share of 16.7 percent, German American Bank

with a market share of 11.5 percent, Synchrony Bank with a market share of 9.8 percent, and Capital One Bank (USA), NA. with a market share of 7.8 percent.

Muncie MSA

The bank lending activity in the AA is excellent.

According to FDIC Deposit Market Share data as of June 30, 2018, ONB had \$186.2 million in deposits with a deposit market share of 7.3 percent. ONB ranked fourth in total deposits out of six banks in the AA.

According to 2018 peer mortgage data, ONB ranked in the top three percent of lenders, second out of 194 lenders, originating home mortgage loans in the AA. The bank's market share of 4.1 percent and rank in loans is weaker than the bank's market share and rank in deposits. The remaining four largest mortgage lenders have captured 38.1 percent of the market. The top lenders are First Merchants Bank with a market share of 13.9 percent, Mutual Bank with a market share of 12.2 percent, Ruoff Mortgage Company, Inc., with a market share of 6.7 percent, and Caliber Home Loans, Inc., with a market share of 5.3 percent.

According to 2017 peer small business data, ONB ranked ninth out of 51 lenders originating small business loans in the AA. The bank's market share of 4.4 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest small business lenders have captured 50.7 percent of the market. The top small business lenders are Star Financial Bank with a market share of 11.9 percent, American Express, FSB with a market share of 11.4 percent, First Merchants Bank with a market share of 9.3 percent, chase Bank USA, NA with a market share of 9.3 percent and Mutual Bank with a market share of 8.8 percent.

According to 2017 peer small farm data, ONB ranked second out of 17 lenders originating small farm loans in the AA. The bank's market share of 17.7 percent and rank in loans is stronger than the bank's market share and rank in deposits. The remaining four largest small farm lenders have captured 52.9 percent of the market. The four large small farm lenders are First Merchants Bank with a market share of 18.8 percent, Star Financial Bank with a market share of 12.9 percent, John Deere Financial, F.S.B with a market share of 11.8 percent, and First Farmers Bank and Trust with a market share of 9.4 percent.

Indianapolis-Carmel-Anderson MSA

The bank's lending activity in the AA is adequate.

According to FDIC Deposit Market Share data as of June 30, 2018, ONB had \$1.1 billion in deposits with a deposit market share of 2.3 percent. ONB ranked 13th in total deposits out of 44 banks in the AA.

According to 2018 peer mortgage data, ONB ranked in the top four percent of lenders, 24th out of 585 lenders, originating home mortgage loans in the AA. The bank's market share of one percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest mortgage lenders have captured 24 percent of the market. The top lenders are The Huntington National Bank with a market share of 5.7, Caliber Home Loans, Inc., with a market share of 5.4 percent, JP Morgan Chase Bank National with a market share of 4.7 percent Wells Fargo Bank, National Association with a market share of 4.3 and Ruoff Mortgage Company, Inc., with a market share of 3.9 percent.

According to 2017 peer small business data, ONB ranked 14th out of 129 lenders originating small business loans in the AA. The bank's market share of 1.5 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest small business lenders have captured 57.2 percent of the market. The top small business lenders are Chase Bank USA, NA with a market share 16.3 percent, American Express, FSB with a market share of 16.1 percent, PNC Bank NA with a market share of 12.6 percent, Capital One Bank (USA) NA with a market share of 7.4 percent, and Citibank, NA with a market share of 4.6 percent.

According to 2017 peer small farm data, ONB ranked 10th out of 23 lenders originating small farm loans in the AA. The bank's market share of 2.3 percent in loans is the same as the bank's market share in deposits, and the bank's rank in loans is stronger than the bank's rank in deposits. The five largest small farm lenders have captured 64.7 percent of the market. The top small farm lenders are John Deere Financial FSB with a market share of 22.2 percent, First Farmers Bank and Trust with a market share of 17.8 percent, Chase Bank USA, NA with a market share of 10.7 percent, First Merchants Bank with a market share of 7.4 percent, and PNC Bank, NA with a market share of 6.6 percent.

Indiana Non-MSA

The bank lending activity in the AA is excellent.

According to FDIC Deposit Market Share data as of June 30, 2018, ONB had \$1.6 billion in deposits with a deposit market share of 16.3 percent. ONB's deposit market share ranked first out of 41 banks in the AA.

According to 2018 peer mortgage data, ONB ranked in the top one percent of lenders, third out of 365 lenders, originating home mortgage loans in the AA. Although the bank's market share of 4.7 percent and rank in loans are weaker than the bank's market share and rank in deposits, the bank's mortgage lending rank is significantly stronger than deposit rank when considering the bank is the third largest lender out of 365 lenders in the AA. The remaining four largest mortgage lenders have captured 23.3 percent of the market. The top lenders are German American Bank with a market share of 10.5 percent, Ruoff Mortgage Company, Inc., with a market share of 5.1 percent,

Wells Fargo Bank National Association with a market share of 4.1 percent, and Lake City Bank with a market share of 3.6 percent.

According to 2017 peer small business data, ONB ranked sixth out of 85 lenders originating small business loans in the AA. The bank's market share of 5.9 percent and rank in loans are weaker than the bank's deposit market share and ranking, but the bank's rank in small business lending is comparable to the deposit market share when considering the number of competitors relative to the number of depository institutions. The five largest small business lenders have captured 43.5 percent of the market. The top small business lenders are German American Bank with a market share of 12.7 percent, American Express, FSB with a market share 9.1 percent, Capital One Bank (USA), NA with a market share of 8.2 percent, Chase Bank USA, NA with a market share of 7.0 percent, and US Bank NA with a market share of 6.5 percent.

According to 2017 peer small farm data, ONB ranked second out of 37 lenders originating small farm loans in the AA. The bank's market share of 18.6 percent is stronger than the bank's market share in deposits and near to the bank's rank in deposits. The remaining four largest small farm lenders have captured 53.0 percent of the market. The top small farm lenders are First Merchants Bank with a market share of 18.8 percent, Star Financial Bank with a market share of 12.9 percent, John Deere Financial F.S.B with a market share of 11.8 percent, and First Farmers Bank and Trust with a market share of 9.5 percent.

Distribution of Loans by Income Level of the Geography

During the evaluation period, the overall geographic distribution of loans was good. The geographic distribution of home mortgage loans was good, small business was adequate, and small farm loans was excellent.

Home Mortgage Loans

During the evaluation period, the distribution of the bank's home mortgage lending was good.

Refer to Table O 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.

Bloomington MSA

The overall geographic distribution of home mortgage loans was good.

During the 2018 analysis period, the performance was adequate. The proportion of loans in 2018 was significantly below the percentage of owner-occupied housing units in low-income CTs and exceeded the percentage in moderate-income CTs. The proportion

of loans was significantly below the aggregate distribution in low-income CTs and near to the aggregate distribution in moderate-income CTs.

During the 2017 analysis period, the performance was good. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income CTs and exceeded the percentage in moderate-income CTs. The proportion of loans was below the aggregate distribution in low-income CTs and was near to the aggregate distribution in moderate-income CTs.

During the 2016 analysis period, the performance was excellent. The proportion of loans exceeded the percentage of owner-occupied housing units in low-income CTs and was near to the percentage in moderate-income CTs. The proportion of loans exceeded the aggregate distribution in LMI CTs.

Indianapolis-Carmel-Anderson MSA

The overall geographic distribution of home mortgage loans was adequate.

The distribution of the bank's home mortgage lending in 2018 was adequate. The proportion of loans was well below the percentage of owner-occupied housing units in low-income CTs and below the percentage in moderate-income CTs. The proportion of loans was below the aggregate distribution in LMI CTs.

During the 2017 analysis period, the performance was adequate. The proportion of loans was significant below the percentage of owner-occupied housing units in low-income CTs and was below to the percentage in moderate-income CTs. The proportion of loans was below the aggregate distribution in low-income CTs and was near to the aggregate distribution in moderate-income CTs.

During the 2016 analysis period, the performance was adequate. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income CTs and was below to the percentage in moderate-income CTs. The proportion of loans was significant below the aggregate distribution in low-income CTs and exceeded the aggregate distribution in moderate-income CTs

Muncie MSA

The overall geographic distribution of home mortgage loans was good.

The distribution of the bank's home mortgage lending in 2018 was poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in LMI CTs. The proportion of loans was well below the aggregate distribution in LMI CTs.

During the 2017 analysis period, the performance was good. The proportion of loans was well below the percentage of owner-occupied housing units in low-income CTs and

below the percentage in moderate-income CTs. The proportion of loans exceeded the aggregate distribution in LMI CTs.

During the 2016 analysis period, the performance was good. The proportion of loans was well below the percentage of owner-occupied housing units in LMI CTs. The proportion of loans exceeded the aggregate distribution in LMI CTs.

Indiana Non-MSA

The overall geographic distribution of home mortgage loans was good. Conclusions are based on performance in moderate income CTs as there are no low-income CTs in the AA.

During the 2018 analysis period, the distribution of the bank's home mortgage lending in 2018 was poor. The proportion of loans was well below the percentage of owner-occupied housing units in moderate-income CTs. The proportion of loans was well below the aggregate distribution in moderate-income CTs.

During the 2017 analysis period, the performance was good. The proportion of loans was near to the percentage of owner-occupied housing units and the aggregate distribution in moderate-income CTs.

During the 2016 analysis period, the performance was good. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income CTs. The proportion of loans exceeded the aggregate distribution in moderate-income CTs.

Small Loans to Businesses

The geographic distribution of the bank's originations and purchases of small loans to businesses was adequate.

Refer to Table Q in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Bloomington MSA

The overall geographic distribution in the AA is adequate.

During the 2018 analysis period, the distribution of small loans to businesses in LMI CTs was excellent. The proportion of loans is near to the percentage of businesses in low-income CTs and exceeded the percentage of businesses in moderate-income CTs. The proportion of small loans to businesses in low-income CTs was near to the aggregate distribution of loans in those CTs and exceeded the distribution of loans in moderate-income CTs.

During the 2017 analysis period, the performance was adequate. The proportion of loans was well below the percentage of businesses in low-income CTs and below the percentage of businesses in moderate-income CTs. The bank's lending performance was below the aggregate distribution of loans in those CTs.

During the 2016 analysis period, the performance was good. The proportion of loans was well below the percentage of businesses in low-income CTs and the aggregate distribution of loans in those CTs. The proportion of loans exceeded the percentage of businesses in middle-income CTs and the aggregate distribution of loans in those CTs.

Indianapolis-Carmel-Anderson MSA

The overall geographic distribution in the AA is excellent.

During the 2018 analysis period, the distribution of small loans to businesses in LMI CTs was excellent. The proportion of loans exceeded the percentage of businesses in low-income CTs and was near to the percentage of businesses in moderate-income CTs. The proportion of small loans to businesses in LMI CTs exceeded the aggregate distribution of loans in those CTs.

During the 2016 and 2017 analysis periods, the performance was excellent and consistent with 2018 performance.

Muncie MSA

The overall geographic distribution in the AA is good.

During the 2018 analysis period, the distribution of small loans to businesses in LMI CTs was good. The proportion of loans was below both the percentage of businesses in low-income CTs and the percentage of businesses in moderate-income CTs. The proportion of small loans to businesses in low-income CTs exceeded the aggregate distribution of loans in those CTs and was well below the distribution of loans in moderate-income CTs.

During the 2017 analysis period, the distribution of small loans to businesses in LMI CTs was good. The proportion of loans was below both the percentage of businesses in low-income CTs and the percentage of businesses in moderate-income CTs. The proportion of small loans to businesses in low-income CTs was below both the aggregate distribution of loans in those CTs and the distribution of loans in moderate-income CTs.

During the 2016 analysis period, the distribution of small loans to businesses in LMI CTs was adequate. The proportion of loans was well below both the percentage of businesses in low-income CTs and the percentage of businesses in moderate-income CTs. The proportion of small loans to businesses in low-income CTs was below both

the aggregate distribution of loans in those CTs and the distribution of loans in moderate-income CTs.

Indiana Non-MSA

The overall the geographic distribution in the AA is good. Conclusions are based on performance in moderate income CTs as there are no low-income CTs in the AA.

During the 2018 analysis period, the distribution of small loans to businesses in LMI CTs was good. The proportion of loans was below the percentage of businesses in moderate-income CTs. The proportion of small loans to businesses in moderate-income CTs was near to the aggregate distribution of loans in those CTs.

During the 2017 analysis period, the performance was good and consistent with the performance in 2018.

During the 2016 analysis period, the performance was excellent. The proportion of loans is near to the percentage of businesses in moderate-income CTs and exceeded the aggregate distribution of loans in those CTs.

Small Loans to Farms

Small loans to farms were not a primary loan product in the state. The bank did not originate or purchase a sufficient volume of small loans to farms during the evaluation period, therefore, they were not analyzed except for the Indiana Non-MSA.

The geographic distribution of the bank's originations and purchases of small loans to farms was excellent. Conclusions are based on performance in moderate-income CTs as there are no low-income CTs in the AA.

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

Indiana Non-MSA

No lending data was reported in the low-income CTs of this AA.

During the 2018 evaluation period, the distribution of small loans to farms in moderate-income geographies was good. The proportion of loans was below the percentage of farms in moderate-income CTs. The proportion of small loans to farms in moderate-income CTs exceeded the aggregate distribution of loans in moderate-income CTs.

During the 2016 and 2017 analysis periods, the performance was excellent. The performance was based on the proportion of loans was near to the percentage of farms

in moderate-income CTs and the proportion of loans that exceeded the aggregate distribution of loans in moderate-income CTs.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed ONB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

During the evaluation period, the overall borrower distribution of loans was excellent. The borrower distribution of home mortgage loans was excellent, small business was good, and small farm loans was excellent.

Home Mortgage Loans

The overall distribution of the bank's loans to LMI borrowers was excellent. Refer to Table P 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.

Bloomington MSA

The distribution of the bank's home mortgage loans to LMI borrowers was excellent.

The borrower distribution of the bank's home mortgage lending in 2018 was good. The proportion of loans was below the percentage of low-income families and near to the percentage of moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to low-income families and was below the aggregate distribution to moderate-income families.

During the 2017 analysis period, the performance was good. The proportion of loans was below the percentage of low-income families and near to the percentage of moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to low-income families and was near to the aggregate distribution to moderate-income families.

During the 2016 analysis period, the performance was excellent. The proportion of loans was below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to LMI families.

Indianapolis-Carmel-Anderson MSA

The distribution of the bank's home mortgage loans to LMI borrowers was good.

During the 2018 analysis period, the distribution of the bank's home mortgage loans to LMI borrowers was good. The distribution of the bank's home mortgage lending in 2018 was good. The proportion of loans was below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans was near to the aggregate distribution of loans to LMI families.

During the 2017 analysis period, the performance was excellent. The proportion of loans was below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to LMI families.

During the 2016 analysis period, the performance was good. The proportion of loans was well below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans was near to the aggregate distribution of loans to low-income families and exceeded the aggregate distribution to moderate-income families.

Muncie MSA

The distribution of the bank's home mortgage loans to LMI borrowers was good.

The distribution of the bank's home mortgage lending in 2018 was good. The proportion of loans was well below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans was below the aggregate distribution of loans to low-income families and exceeded the aggregate distribution to moderate-income families.

During the 2016 and 2017 analysis periods, the performance was good and consistent with 2018. The proportion of loans was below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to LMI families.

Indiana Non-MSA

The distribution of the bank's home mortgage loans to LMI borrowers was excellent.

The distribution of the bank's home mortgage lending in 2018 was excellent. The proportion of loans was near to the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to LMI families.

During the 2016 and 2017 analysis periods, the performance was excellent and consistent with 2018. The proportion of loans was near to the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to LMI families.

Small Loans to Businesses

The borrower distribution of the bank's originations and purchases of small loans to businesses was good.

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

Bloomington MSA

The overall distribution of bank small loans to businesses by gross annual revenues was good.

During the 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was adequate. The proportion of loans was significantly below the percentage of small businesses and near to the aggregate distribution of loans to those businesses.

During the 2017 analysis period, the performance was adequate. The proportion of loans was significantly below the percentage of small businesses and near to the aggregate distribution of loans to those businesses.

During the 2016 analysis period, the performance was good. The proportion of loans was well below the percentage of small businesses and exceeded the aggregate distribution of loans to those businesses.

Indianapolis-Carmel-Anderson MSA

The overall distribution of bank small loans to businesses by gross annual revenues was adequate.

During the 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was poor. The proportion of loans was significantly below the percentage of small businesses and below the aggregate distribution of loans to those businesses.

During the 2017 analysis period, the performance was adequate. The proportion of loans was significantly below the percentage of small businesses and near to the aggregate distribution of loans to those businesses.

During the 2016 analysis period, the performance was good. The proportion of loans was well below the percentage of small businesses and exceeded the aggregate distribution of loans to those businesses.

Muncie MSA

The overall distribution of bank small loans to businesses by gross annual revenues was good.

During the 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was good. The proportion of loans was below the percentage of small businesses and exceeded the aggregate distribution of loans to those businesses.

During the 2016 and 2017 analysis periods, the performance was good and consistent with performance in 2018.

Indiana Non-MSA

The overall distribution of bank small loans to businesses by gross annual revenues was good.

During the 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was good. The proportion of loans was below the percentage of small businesses and exceeded the aggregate distribution of loans to those businesses.

During the 2017 analysis period, the performance was good. The proportion of loans was well below the percentage of small businesses and exceeded the aggregate distribution of loans to those businesses.

During the 2016 analysis period, the performance was good and consistent with performance in 2018.

Small Loans to Farms

The borrower distribution of the bank's originations and purchases of small loans to farms was excellent.

Refer to Table T in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Indiana Non-MSA

During the 2018 analysis period, the distribution of the bank's small loans to farms by revenue was excellent. The proportion of loans was near to the percentage of small businesses but exceeded the aggregate distribution of loans to those businesses.

During the 2016 and 2017 analysis periods, the performance was excellent and consistent with performance in 2018.

Community Development Lending

The bank has made a relatively high level of CD loans, which had a positive impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans, that also qualify as CD loans.

Bloomington MSA

ONB originated four CD loans totaling \$8.4 million which is equivalent to 9.1 percent of allocated tier 1 capital. CD loans originated exhibited an adequate responsiveness to the credit and community needs in the AA. Loans supported community services to LMI and economic development.

Examples of CD loans originated during the evaluation period include:

- \$5.3 million construction line of credit to support a 35-unit affordable housing development in the AA. The apartments are considered permanent supportive housing and will have project-based rent subsidies for chronically homeless individuals with disabilities, with on-site case management offices offering support services to the residents. The project received an Affordable Housing Program (AHP) grant through the Federal Home Loan Bank of Indianapolis, awarded LIHTC, received funds from the city, and funding support from the Indiana Housing & Community Development Authority (IHCDA). This is an innovative project utilizing several community partners.
- \$1.2 million renewal loans funding two mixed-use commercial and residential projects, which promotes economic development. The project will create and retain jobs that primarily benefit LMI individuals.

Indianapolis-Carmel-Anderson IN MSA

ONB originated 26 CD loans totaling \$87.6 million and representing 57.9 percent of allocated tier 1 capital. CD loans originated exhibited excellent responsiveness to the credit and community needs in the AA. Loans supported affordable housing, community services to LMI, economic development, and revitalization/stabilization in the AA.

Examples of CD loans originated during the evaluation period include:

- \$5 million revolving line of credit to fund micro-loans issued to a regional incubator and advanced stage business center. The mission of the organization is to be a premier technology-based business center, creating, growing and attracting jobs, and contributing to the long-term economic development of the communities of the city, county, and state. This project received TIF funding and grants from the U.S. Department of Commerce and HUD's Economic Development Initiative Special Project.
- \$25.3 million in a construction loan to build an advanced research and innovation facility, part of an urban innovation community. This project supports job creation, skills training and other job-readiness programs, neighborhood revitalization, and region-wide economic prosperity.
- \$1.9 million construction line of credit for the purchase and improvements of a charter school operated by a CDFI and nonprofit organization. The school will provide educational services targeted to low-income individuals and a focus in stabilizing those schools.
- \$7 million in six multifamily development loans to various entities, which created over 217 affordable housing units.

Muncie MSA

ONB originated three CD loans totaling \$2.8 million and representing 11.3 percent of allocated tier 1 capital. CD loans originated exhibited adequate responsiveness to the credit and community needs in the AA. The two loans to a nonprofit provide community health services to LMI people. The organization also runs a juvenile detention center licensed by the Department of Corrections.

Indiana Non- MSA

ONB originated seven CD loans totaling \$27.5 million and representing 13.7 percent of allocated tier 1 capital. CD loans originated exhibited adequate responsiveness to the credit and community needs in the AA. Loans supported affordable housing and economic development in the AA.

Examples of CD loans originated during the evaluation period include:

- \$20.2 million in four renewal lines of credit to support operations to accommodate business expansion. The project will result in the creation of approximately 114 new jobs and retain 92 workers, which will also purchase, renovate, and equip a new facility in the area. The company received \$1 million in conditional tax credits from the Indiana Economic Development Corporation based on the company's job creation plans and awarded TIF funds from the city.

- \$200 thousand in two renewal line of credits to provide working capital to support operations of a nonprofit organization, which assist with community affordable housing and economic development projects and initiatives in several counties in the state.

State of Indiana

In addition, ONB originated fifteen CD loans totaling \$69.6 million within the state. Loans supported economic development and revitalization/stabilization in the state. The loans were considered impactful to the state and had a positive impact on lending performance in the rating area.

Product Innovation and Flexibility

The bank makes little use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the “Other Performance” section under the Scope of the Evaluation section for additional details regarding other programs.

ONB works in conjunction with the IHCD to offer affordable housing assistance programs to first time and other qualified homebuyers. These affordable loan products are offered under the agency’s programs, which may include DPA (forgiven in as little as two years), closing cost assistance, and tax credits. ONB leveraged these programs to originate 37 loans totaling \$3.6 million within the AAs during the evaluation period. The following is a breakdown of the loans by AA:

- 15 loans totaling \$1.5 million in the Indianapolis-Carmel-Anderson MSA
- 9 loans totaling \$886 thousand in the Lafayette-West Lafayette MSA
- 5 loans totaling \$396 thousand in the Terre Haute MSA
- 4 loans totaling \$439 thousand in the South Bend-Mishawaka MSA
- 2 loans totaling \$184 thousand in the Indiana Non-MSA
- 1 loan totaling \$96 thousand in the Fort Wayne MSA
- 1 loan totaling \$66 thousand in the Muncie MSA

Conclusions for Area Receiving Limited-Scope Reviews

Refer to Tables O through T in the state of Indiana section of appendix D for the facts and data that support these conclusions.

Based on limited-scope reviews, the bank’s performance in the Columbus MSA, Fort Wayne MSA, Lafayette-West Lafayette MSA, and Terra Haute MSA is consistent with the bank’s overall High Satisfactory performance rating under the Lending Test in the state of Indiana. Performance in the Elkhart-Goshen MSA and South Bend-Mishawaka MSA is weaker than the state of Indiana rating. Performance differences are due to the weaker level of HMDA and CRA geographic distribution in the AAs. Weaker performance did not impact conclusions about the bank’s performance in the state.

INVESTMENT TEST

The bank's performance under the Investment Test in Indiana is rated Outstanding. ONB made 928 investments and donations, totaling \$102.0 million, in Indiana. This represents 15.2 percent of allocated tier 1 capital in the state. The bank's performance in the limited-scope AAs enhanced the bank's overall Investment Test rating, in addition to the qualified investments made on a statewide basis.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Bloomington MSA	3	2,070	64	2,423	67	7.27	4,493	4.45	0	0
Columbus MSA	0		26	976	26	2.82	976	0.97	0	0
Elkhart-Goshen MSA	6	4,111	25	390	31	3.36	4,501	4.46	0	0
Fort Wayne MSA	2	3,531	109	15,287	111	12.04	18,818	18.66	0	0
Indianapolis-Carmel-Anderson MSA	9	18,316	271	36,682	280	30.37	54,998	54.53	0	0
Lafayette-West Lafayette MSA	0	0	58	1,386	58	6.29	1,386	1.37	0	0
Muncie MSA	0	0	43	523	43	4.66	523	0.52	0	0
South Bend-Mishawaka MSA	1	493	31	539	32	3.47	1,032	1.02	0	0
Terre Haute MSA	0	0	36	267	36	3.90	267	0.26	0	0
IN non-MSA	5	7,116	233	6,748	238	25.81	13,864	13.75	0	0

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

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

Conclusions for Areas Receiving Full-Scope Reviews

The bank's overall performance in the full-scope AAs is High Satisfactory. Based on full-scope reviews, the bank's performance in the Indianapolis-Carmel-Anderson MSA and IN Non MSA is excellent. The bank's performance in the Bloomington MSA is good and in the performance in the Muncie MSA is adequate.

Bloomington MSA

The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits good responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

ONB made \$4.5 million in qualified investments within the AA, representing 4.8 percent of allocated tier 1 capital. These investments included \$2.1 million in prior period

investments, \$2.2 million in current period investments, and \$180,000 in grants and in-kind donations.

Current period investments were centered in MBS and in a CRA qualified investment bond fund. Prior period investments supported the improvements to infrastructure in the AA.

Grants and in-kind donations primarily supported economic development and community service organizations. Organizations supporting affordable housing and revitalization/stabilization also received a small amount of donations.

Examples of qualified grants in the AA include:

- \$24,000 to an organization addressing the critical needs of individuals and families and working to reduce those needs in the future.
- \$4,500 donation to a community service organization providing workplace skills to low-income women.
- \$5,000 to an organization expanding housing options for LMI households.

Indianapolis-Carmel-Anderson MSA

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits excellent responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

ONB made \$55.0 million in qualified investments within the AA, representing 36.4 percent of allocated tier 1 capital. These investments included \$18.3 million in prior period investments, \$34.1 million in current period investments, and \$2.6 million in grants and in-kind donations.

Prior period investments were centered in bonds issued for renovations to schools that primarily serve LMI students. ONB has nine outstanding investments, which aided six schools.

Current period investments were made up of MBS (\$10.3 million) and economic development organization focused on supporting closely-held businesses helping LMI areas or families (\$5.0 million) and school corporation municipal bonds of \$14.2 million.

Examples of qualified grants in the AA include:

- \$1.2 million to a community service organization providing educational services and scholarships to low-income families.

- \$307,000 to an economic development organization supporting new businesses and job creation in LMI areas.
- \$155,000 to an organization working to break the cycle of poverty in Indianapolis.
- \$32,000 in-kind donation of IT equipment to an organization working to bring broadband to all communities.

Muncie MSA

The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits good responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

ONB made \$523,000 in qualified investments within the AA, representing 2.1 percent of allocated tier 1 capital. These investments included \$241,000 in current period investments and \$282,000 in grants and in-kind donations.

Current period investments consist of a \$65,000 investment in a CRA qualified investment bond fund and an MBS investment, totaling \$175,000.

Examples of qualified grants in the AA include:

- \$112,900 to an organization offering services to low-income youth that have been abused and/or neglected.
- \$10,000 to an organization offering educational services to LMI individuals.
- \$100,000 donation to support schools where the majority of students receive free or reduced lunch.

Indiana Non- MSA

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

ONB made \$13.9 million in qualified investments within the AA, representing 6.9 percent of tier 1 capital. These investments included \$7.1 million in prior period investments, \$5.9 million in current period investments, and \$870,000 in grants and in-kind donations.

Prior period investments included four bonds, with an outstanding book balance of \$932,000, supporting schools that primarily serve LMI families. The bank also had one outstanding LIHTC equity investment supporting affordable housing. Current period investments included \$3.9 million to support school systems with a majority of students receiving free or reduced lunch, \$1.5 million to a CRA qualified investment bond fund, and MBS investments.

Examples of current period investments, including grants and in-kind donations, in the AA include:

- \$50,000 to a literacy organization supporting LMI areas.
- \$30,000 to an organization dedicated to attracting businesses and expanding job opportunities.
- \$50,000 to support the renovation of a vacant building and attract new businesses.

Statewide

ONB made six investments, totaling \$1.1 million, that served areas outside of their AAs but within the state. Two of these investments were prior period investments in LIHTCs, with an outstanding book value of \$681,000. The remaining four were current period investments, which supported economic development and community services.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Elkhart-Goshen MSA, Fort Wayne MSA, and South Bend-Mishawaka, IN MSA is stronger than the bank's overall performance under the Investment Test in the full-scope areas. These AAs had excellent levels of investments and grants representing 42.1, 28.2, and 6.0 percent of allocated tier 1 capital, respectively. The bank's performance in the Columbus MSA and the Lafayette-West Lafayette MSA is consistent with the bank's overall performance under the Investment Test in the full-scope areas. The bank's performance in the Terre Haute MSA is weaker than the bank's overall performance under the Investment Test in the full-scope areas. This is due to the limited amount of investments in the AA; however, this is mitigated by the closing of a branch, which eliminated this AA in November 2017.

SERVICE TEST

The bank's performance under the Service Test in Indiana is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Bloomington, IN MSA is good; in the Indianapolis-Carmel-Anderson, IN MSA is adequate; in the Muncie, IN MSA is adequate; and in the Indiana Non-MSA is excellent.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Bloomington, IN MSA	13.8	5	6.9	0.0	40.0	40.0	20.0	9.7	18.5	34.8	37.0
Columbus., IN MSA	3.5	3	4.1	0.0	33.3	0.0	66.7	0.0	25.7	49.8	24.5
Elkhart-Goshen, IN MSA	1.6	1	1.4	100	0.0	0.0	0.0	1.0	19.3	59.5	20.2
Fort Wayne IN MSA	9.9	5	6.9	0.0	0.0	40.0	60.0	10.6	19.4	38.8	31.2
Indianapolis-Carmel-Anderson IN MSA	22.5	22	28.8	0.0	27.3	18.2	54.5	11.7	23.7	31.5	33.1
Lafayette-West Lafayette IN MSA	5.1	4	5.5	0.0	50.0	0.0	50.0	6.1	18.7	31.0	44.2
Muncie IN MSA	3.7	4	6.8	0.0	25.0	50.0	25.0	5.7	25.0	27.3	42.0
South Bend-Mishawaka IN MSA	2.6	3	4.1	33.3	33.3	0.0	33.3	8.9	17.9	41.9	31.3
Terre Haute IN MSA	7.6	5	8.2	0.0	20.0	60.0	20.0	6.8	22.3	35.9	35.0
Indiana Non-MSA	29.7	21	27.3	0.0	23.8	61.9	14.3	0.0	9.5	71.4	19.1

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Bloomington, IN MSA	0	1	0	0	-1	0
Columbus., IN MSA	0	1	0	0	-1	0
Fort Wayne IN MSA	0	1	0	-1	0	0
Indianapolis-Carmel-Anderson IN MSA	2	6	0	-3	-1	0
Lafayette-West Lafayette IN MSA	0	1	0	-1	0	0
Muncie IN MSA	0	2	0	-1	-1	0
South Bend-Mishawaka IN MSA	0	2	0	-1	0	-1
Terre Haute IN MSA	0	1	0	-1	0	0
Indiana Non-MSA	0	6	0	-1	-5	0

Bloomington IN MSA

ONB's branch distribution and retail service performance is good.

The bank's branches are accessible to geographies and individuals of different income levels in the AA. The bank has five branches located within the AA, none located within a low-income CT, and two within a moderate-income CT. The percentage of the bank's branches in moderate-income CTs exceeds the percentage of population living in the moderate-income CTs.

ATM distribution throughout the AA is good. The bank has five deposit-taking ATMs located in the AA, with no ATMs in low-income CTs, and two ATMs in moderate-income CTs. The percentage of ATMs in moderate-income CTs exceeds the level of population in those areas.

The opening and closing of branches have generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed one branch in the AA within a middle-income CT due to branch consolidations.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours of 9:00 a.m. to noon.

The bank complements its traditional service delivery methods with certain alternative delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Indianapolis-Carmel-Anderson IN MSA

Branch distribution and retail service performance is adequate.

The bank's branches are reasonably accessible to geographies and individuals of different income levels in the AA. The bank has 22 branches located within the AA. Six branches are located within moderate-income CTs. The bank has no branches in low-income CTs. The bank's distribution of branches in low income CTs is below the percentage of population in low-income CTs, but the percentage of branches in the moderate-income CTs exceeds the moderate-income population.

ATM distribution throughout the AA is adequate. The bank has 23 deposit-taking ATMs located in the AA, with no ATMs in low-income CTs, and six ATMs in moderate-income CTs. The percentage of ATMs in moderate-income CTs is above the level of population in those areas.

The opening and closing of branches have adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and/or to moderate-income individuals. The bank opened two branches in middle- and upper-income CTs. The bank closed six branches in the AA, three within moderate-income CTs, two in middle-income CTs, and one in an upper-income CT due to branch consolidations.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours of 9:00 a.m. to noon.

The bank complements its traditional service delivery methods with certain alternative delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Muncie IN MSA

ONB's branch distribution and retail service performance is adequate.

The bank's branches are reasonably accessible to geographies and individuals of different income levels in the AA. The bank has four branches located within the AA with none located within a low-income CT, and one within a moderate-income CT. The percentage of the bank's branches in moderate-income CTs approximates the percentage of population living in the moderate-income CTs.

ATM distribution throughout the AA is poor. The bank has two deposit-taking ATMs located in the AA, with no ATMs in low-income or moderate-income CTs.

The opening and closing of branches have generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed two branches in the AA, one within a moderate-income CT and one in a middle-income CT due to branch consolidations. While the bank did not provide any near-to branch data for the closed moderate-income CT branch, the two middle-income CT branches are within 2-5 miles of the closed moderate-income branch CT with good public transportation.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI CTs and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours of 9:00 a.m. to noon.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Indiana Non-MSA

ONB's branch distribution and retail service performance is excellent.

The bank's branches are readily accessible to geographies and individuals of different income levels in the AA. The bank has 21 branches located within the AA, with five located within moderate-income CTs. There are no low-income CTs in the AA. The percentage of the bank's branches in moderate-income CTs is above the percentage of population living in those CTs.

ATM distribution throughout the AA is excellent. The bank has eight deposit-taking ATMs located in the AA, with three ATMs located in moderate-income CTs. The percentage of ATMs in moderate-income CTs exceeds the level of population in the moderate-income areas.

The opening and closing of branches have generally not adversely affected the accessibility of its delivery systems, particularly in LMI CTs and/or to LMI individuals. The bank closed two branches in the AA, one within a moderate-income CT and one within a middle-income CT due to branch consolidations.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI CTs and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours of 9:00 a.m. to noon.

The bank complements its traditional service delivery methods with certain alternative delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

The bank provides a significant level of CD services.

Bloomington MSA

ONB provides a significant level of CD services in the Bloomington, IN MSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

ONB employees from various lines of business provided technical assistance to 80 different CD organizations totaling 2,297 hours during the evaluation period. Bank personnel reported 2,123 service hours serving on the Board of Directors of organizations and using their financial expertise to provide technical assistance to qualified

organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

ONB personnel conducted financial literacy sessions and first-time homebuyer workshops for housing coalitions. Bank employees provided financial literacy education to 95 LMI individuals through activities provided for qualified organizations.

Examples of some of these services include:

New Hope Family Shelter – New Hope is the only family emergency housing recovery agency for whole families that primarily serves Monroe County, Indiana. An associate volunteered over 850 hours serving as a board member and providing technical assistance with the financial management of the organization. An associate assisted with processing and preparing of payroll and payroll tax, distributing payroll to 15 employees, general financial management, coordination, fundraising and advising.

Big Brothers Big Sisters of South-Central Indiana (BBBSSCI) – The BBBS mission is to help children reach their potential through one-to-one relationships with mentors that have a measurable impact on youth. BBBSSCI serves a 95 percent disadvantaged population. 85 percent of family incomes rank below poverty level, and 80 percent of the children served are on free- and reduced-lunches. Several associates volunteered over 500 hours with this organization through board membership and fundraising support.

Indianapolis-Carmel-Anderson IN MSA

ONB provides a relatively high level of CD services in the Indianapolis-Carmel-Anderson, IN MSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

ONB employees from various lines of business provided technical assistance to 140 different CD organizations totaling 3,732 hours during the evaluation period. ONB staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI families, and economic development.

Examples of some of these services include:

Outside the Box - The mission is to empower people with intellectual disabilities toward personal growth, through education, self-discovery, leadership development, and a customized career path. The organization noted that 90 percent of their clients are unemployed. In addition, 96 percent of the clients are utilizing the Medicaid Waiver program. Employee provided 66 hours of technical expertise.

Financial Literacy - A dedicated Financial Empowerment Officer in the Indianapolis area volunteered over 400 hours teaching financial empowerment programs to organizations such as Habitat for Humanity, MidNorth Program, Coburn Place Women's Shelter, Oasis Seniors, Indiana Department of Corrections-Pendleton, and Shephard Community Center.

Muncie MSA

ONB provides a relatively high level of CD services in the Muncie MSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

ONB employees from various lines of business provided technical assistance to 37 different CD organizations totaling 2,512 hours during the evaluation period. ONB staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

Examples of some of these services include:

Heritage Place of Indianapolis, Inc. - Heritage Place provides older adults with comprehensive and coordinated human services to encourage and promote healthy lifestyles, independence, and well-being & quality of life (97 percent LMI). During the exam cycle, Old National associates donated over 70 hours through board involvement and fundraising support.

Habitat for Humanity of Greater Indianapolis, Inc. - During the exam cycle, Old National associates donated 104 hours through board involvement and providing financial expertise, budget oversight, and assistance with strategic initiatives.

Second Harvest Food Bank - Second Harvest is devoted to feeding the hungry, advocating for those with food insecurity and providing nutrition education. During the exam cycle, Old National associates donated over 230 hours through board involvement and fundraising support.

IN Non-MSA

ONB provides a relatively high level of CD services in the IN Non-MSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

ONB employees from various lines of business provided technical assistance to 159 different CD organizations totaling 5,269 hours during the evaluation period. ONB staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

Examples of some of these services include:

100 Men Who Cook - ONB's signature unique community fund raising event featuring local celebrity chefs who prepare their favorite recipes for guests to sample and enjoy. Old National Bank hosts this event in Jasper (Dubois County) and Vincennes (Knox County) every other year. During the 2016 and 2018 events, Old National associates volunteered over 800 hours to support fundraising efforts for organizations such as Dubois County Court Appointed Special Advocate (CASA) and Meals on Wheels. The CASA supports and promotes court-appointed volunteer advocacy in the community to serve neglected and abused children from LMI families. Meals on Wheels provides basic nutrition and care checks to older adults with severe health issues or disabilities to remain at home. Many of the older adults of the program live below the poverty level.

United Way - Every year, all the UW organizations confirm that more than 51 percent of the individuals or families benefitting from Old National's contributions are LMI. Several ONB associates volunteered over 530 hours during the exam cycle to support the United Way organizations and agency programs. Examples include board membership, technical expertise with financial matters, and fundraising support during their annual campaigns

Conclusions for Areas Receiving Limited-Scope Reviews

Based upon limited-scope reviews, the bank's performance under the service test in the Columbus MSA, Elkhart-Goshen MSA, South Bend-Mishawaka, IN MSA, and Indiana Non-MSA was stronger than its overall performance in the state due to excellent branch distribution. Performance in the Fort Wayne MSA, Lafayette-West Lafayette, IN MSA, and Terre Haute, IN MSA was adequate, although weaker than its overall performance in the state due to branch distribution.

The combined performance in the limited-scope areas was consistent with the bank's overall service test performance rating for the state of Indiana.

State Rating

State of Kentucky

CRA rating for the State of Kentucky:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Adequate responsiveness to credit needs in its AAs, considering the number and amount of home mortgage loans and loans to small businesses in its AAs;
- Good geographic distribution of loans in its AAs;
- Good distribution, particularly in its AAs, of loans among individuals of different income levels and businesses of different sizes;
- An adequate level of CD loans, which had a neutral impact on lending performance;
- A good level of qualified CD investments and grants;
- Services do not vary in any way that inconveniences portions of the bank's AA, particularly LMI geographies and individuals; and
- A relatively high level of CD services.

Description of Institution's Operations in Kentucky

ONB has three AAs within the state of Kentucky which are Owensboro MSA, Kentucky Non MSA and Lexington MSA. Kentucky represents a small rated area by deposits. ONB has \$468 million in deposits representing 3.7 percent of the total bank deposits. ONB operates ten branches within the state representing 5.3 percent of total number of bank offices. The bank made 2.8 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the state. The bank's primary loan products in the state of Kentucky are home mortgages and small business loans.

Based on FDIC Deposit Market Share data of June 30, 2018, ONB had a 0.99 percent deposit market share in the state and is ranked 20th out of 178 banks doing business in the state. The deposits accounted for 3.7 percent of the bank's total deposits. Primary competitors include PNC Bank, National Association ranked first in deposits with a market share of 9.8 percent, JP Morgan Chase Bank, National Association ranked second in deposits with a market share of 7.8 percent, Fifth Third Bank ranked third in

deposits with a market share of 7.6 percent, Branch Banking and Trust Company ranked fourth with a market share of 7.5 percent, and US Bank National Association ranked fifth with a market share of 5.3 percent.

Scope of Evaluation in Kentucky

For the state of Kentucky, the Owensboro MSA received a full scope review. The AA represents 40 percent of bank branches, 84.7 percent of mortgage originations, 59.9 percent of CRA loan originations, and 19.8 percent of total bank deposits for the state.

ONB entered the Lexington, KY MSA in July 2018. Since less than six months of data was applicable during this rating period, this AA was not included in the analysis.

Owensboro KY MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Owensboro KY MSA – 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	4.3	26.1	43.5	26.1	0.0
Population by Geography	98,173	3.7	24.2	46.4	25.6	0.0
Housing Units by Geography	42,217	4.0	25.5	48.0	22.5	0.0
Owner-Occupied Units by Geography	26,615	1.8	18.1	50.9	29.2	0.0
Occupied Rental Units by Geography	11,921	7.8	39.0	43.6	9.5	0.0
Vacant Units by Geography	3,681	7.8	35.4	40.7	16.1	0.0
Businesses by Geography	5,694	3.2	31.3	40.1	25.4	0.0
Farms by Geography	342	0.0	10.8	50.0	39.2	0.0
Family Distribution by Income Level	26,028	21.8	17.7	19.7	40.8	0.0
Household Distribution by Income Level	38,536	24.1	16.6	16.5	42.8	0.0
Median Family Income MSA - 36980 Owensboro, KY MSA 2018 FFIEC AMFI		\$58,106 \$62,300				
			Median Gross Rent			\$643
			Families Below Poverty Level			11.9%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The ONB AA of Owensboro, KY MSA consists of one county of Daviess. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The bank has four branches within the AA, with none in low-income CTs; however, there are two branches in moderate-income CTs. The bank has one deposit-taking ATM located in the AA, in an upper-income CT.

The bank's AA has 23 CTs which are 1-low-income; 6-moderate-income; 10-middle-income, and 6-upper-income.

Housing Characteristics

According to the 2010 U.S. Census, 63.0 percent of the total housing units in the AA were owner-occupied, and 28.2 percent were rental occupied units.

Additionally, 1.8 percent of all owner-occupied units and 7.8 percent of renter occupied units were in low-income CTs. Furthermore, 3.4 percent of all single family (1-4 unit) homes and 10.7 percent of multifamily (five plus unit) housing units were in low-income tracts.

Also, 18.1 percent of all owner-occupied units and 39.0 percent of renter occupied units were in moderate-income CTs. Furthermore, 25.6 percent of all single family (1-4 unit) homes and 34.6 percent of multifamily (five plus unit) housing units were in moderate-income tracts.

Vacant units in the AA were 16.8 and 12.1 percent for low and moderate-income CTs, respectively. The median age of AA housing stock was 58 and 52 years for low and moderate income CTs, respectively.

Employment

According to the BLS, the unemployment rate for this AA was 7.3 percent for January 2016, but it dropped to 3.0 percent for December 2018. The national unemployment rate for the US was 4.9 percent for January 2016 and it dropped to 3.9 percent for December 2018. The AA 2018 rate is lower than the national unemployment rate.

Housing Affordability

Qualifying for a mortgage loan in the AA with an estimated payment of \$911, would be a challenge for low-income borrowers, based on the following analysis. The 2018 FFIEC AMFI in the AA is \$62,300. The median housing value in the AA is \$134,950 in January 2016 and \$169,665 in December 2018 reflecting a percent change of 25.7 from January 2016 to December 2018 according to Realtor.com data. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$31,150 per year (or less than 50 percent of the 2018 FFIEC AMFI in the AA) could afford a \$145,067 mortgage with a payment of \$779 per month.

A moderate-income borrower making \$49,840 per year (or less than 80 percent of the 2018 FFIEC AMFI in the AA) could afford a \$232,107 mortgage with a payment of \$1,246 per month.

Large Employers in the AA

AA large employers include the following: Owensboro Medical Health System; US Bank Home Mortgage; Aleris Rolled Products; Century Aluminum Inc.; Audubon Area Community Services; Toyota's Mid America LLC; Wal-Mart Stores; and Owensboro Community and Technical Colleges.

Community Contacts

The OCC conducted one community contact in the AA. The community contact was conducted with a local Economic Development Office, which reported the following are identified needs within this community:

- Affordable Housing for LMI residents
- Home Improvement Loans for LMI residents
- Home mortgage grant programs for LMI residents

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KENTUCKY

LENDING TEST

The bank's performance under the Lending Test in the state of Kentucky is rated High Satisfactory. The state rating is based primarily on performance in AAs receiving full-scope reviews.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Owensboro MSA is good. We considered the factors discussed in describing the bank's operation in the state above.

Lending Activity

Based on a full-scope review, lending levels in the Owensboro MSA reflect adequate responsiveness to AA credit needs, considering the number and amount of home mortgage, small business, and small farm loans in the AA. We considered the lending volume in the AA relative to its capacity based on deposits, competition, and market presence.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans*	% State Deposits
Kentucky Non-MSA	551	233	90	0	874	58.7%	78.9%
Owensboro MSA	443	143	14	2	602	40.4%	21.1%

**The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.*

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans*	% State Deposits
Kentucky Non-MSA	\$35,505	\$33,161	\$11,643	\$0	\$80,309	47.4%	78.9%
Owensboro MSA	\$56,227	\$25,731	\$1,516	\$550	\$84,024	49.6%	21.1%

**The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.*

Owensboro MSA

According to FDIC Deposit Market Share data as of June 30, 2018, ONB had \$92.7 million in deposits with a deposit market share of 3.2 percent. ONB ranked eighth in total deposits out of 12 banks in the AA.

According to 2018 peer mortgage data, ONB ranked in the top three percent of lenders, fourth out of 142 lenders, originating home mortgage loans in the AA. The bank's market share of 5.5 percent and rank in loans is stronger than the bank's market share and rank in deposits. The remaining four largest mortgage lenders have a 45.3 percent market share of loan originations. The other four largest mortgage lenders are Evansville Teachers with a market share of 17.1 percent, Independence Bank of Kentucky with a market share of 13.7 percent, US Bank National Association with a market share of 9.0 percent, and Branch Banking and Trust Company with a market share of 5.5 percent.

According to 2017 peer small business data, ONB ranked 11th out of 48 lenders originating small business loans in the AA. The bank's market share of 3.4 percent is slightly stronger than the bank's market share in deposits, and the bank's rank in loans is weaker than the bank's market share and rank in deposits. The five largest small business lenders have a 52.1 percent market share of loan originations. The five top small business lenders are Independence Bank of Kentucky with a market share of 13.3 percent, US Bank NA with a market share of 12.3 percent, Branch Banking and Trust Company with a market share of 9.5 percent, American Express, FSB with a market share of 9.1 percent and Synchrony Bank with a market share of 7.9 percent.

Distribution of Loans by Income Level of the Geography

During the evaluation period, the overall geographic distribution of loans was good. The geographic distribution of home mortgage loans was excellent and small business was adequate.

Home Mortgage Loans

During the evaluation period, the distribution of the bank's home mortgage lending was good.

Refer to Table O 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.

Owensboro MSA

The geographic distribution of home mortgage loans was good.

The distribution of the bank's home mortgage lending in 2018 was excellent. The proportion of loans exceeded the percentage of owner-occupied housing units in low-income CTs and was near to the percentage in moderate-income CTs. The proportion of loans exceeded the aggregate distribution in low-income CTs and was near to the aggregate distribution in moderate-income CTs.

During the 2017 analysis period, the performance was good. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income CTs and exceeded the percentage in moderate-income CTs. The proportion of loans was significantly below the aggregate distribution in low-income CTs and was near to the aggregate distribution in moderate-income CTs.

During the 2016 analysis period, the performance was adequate. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income CTs and was near to the percentage in moderate-income CTs. The proportion of loans was significantly below the aggregate distribution in low-income CTs and was near to the aggregate distribution in moderate-income CTs.

Small Loans to Businesses

The geographic distribution of the bank's originations and purchases of small loans to businesses was adequate.

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

Owensboro MSA

During the 2018 analysis period, the distribution of small loans to businesses in LMI CTs was adequate. The proportion of loans was significantly below the percentage of businesses in low-income CTs and exceeded the percentage of businesses in moderate-income CTs. The proportion of small loans to businesses in low-income CTs was significantly below the aggregate distribution of loans in those CTs and exceeded the distribution of loans in moderate-income CTs.

During the 2017 analysis period, the performance was adequate and consistent with performance in 2018.

During the 2016 analysis period, the performance was adequate. The proportion of loans was below the percentage of businesses in low-income CTs and near to the percentage of businesses in moderate-income CTs. The proportion of small loans to businesses was below the aggregate distribution of loans and the distribution of loans in LMI CTs.

Small Loans to Farms

Small loans to farms were not a primary loan product in the state. The bank did not originate or purchase a sufficient volume of small loans to farms during the evaluation period, therefore, they were not analyzed except for the Kentucky Non-MSA .

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed ONB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

During the evaluation period, the overall borrower distribution of loans was good. The borrower distribution of home mortgage loans was good and small business loans was adequate.

Home Mortgage Loans

The distribution of the bank's home mortgage loans to LMI borrowers was good.

Refer to Table P 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.

Owensboro MSA

The distribution of the bank's home mortgage loans to LMI borrowers was good.

During the 2018 analysis period, the distribution of the bank's home mortgage lending was good. The proportion of loans was well below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans was near to the aggregate distribution of loans to LMI families.

During the 2017 analysis period, the performance was adequate. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income CTs and was near to the percentage in moderate-income CTs. The proportion of loans was significantly below the aggregate distribution in low-income CTs and was near to the aggregate distribution in moderate-income CTs.

Performance in the 2016 analysis period was good and consistent with 2018.

Small Loans to Businesses

The borrower distribution of the bank's originations and purchases of small loans to businesses was adequate.

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

Owensboro MSA

During the 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was adequate. The proportion of loans was well below the percentage of small businesses and below the aggregate distribution of loans to those businesses.

During the 2016 and 2017 analysis periods, the performance was adequate. The proportion of loans was well below the percentage of small businesses and near to the aggregate distribution of loans to those businesses.

Small Loans to Farms

Small loans to farms were not a primary loan product in the state. The bank did not originate or purchase a sufficient volume of small loans to farms during the evaluation period, therefore, they were not analyzed except for the Kentucky Non-MSA.

Community Development Lending

The bank has made an adequate level of CD loans, which had a neutral impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to the Number of Loans table in the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Owensboro MSA

ONB originated two CD loans totaling \$550 thousand and representing 4.4 percent of allocated tier 1 capital. CD loans originated exhibited adequate responsiveness to the credit and community needs in the AA. The two loans primarily support affordable housing for LMI people.

Product Innovation and Flexibility

The bank makes limited use of innovative /or flexible lending practices in order to serve AA credit needs. Refer to the "Other Performance" section under the Scope of the Evaluation section for additional details regarding other programs.

ONB works in conjunction with the KHC to offer affordable housing assistance programs to first time and other qualified homebuyers. These affordable loan products are offered under the agency's programs, which may include DPA, closing cost assistance, flexible rate options, and tax credits. ONB leveraged these programs to originate 12 loans totaling \$1.2 million within the AAs during the evaluation period. The following is a breakdown of the loans by AA:

- 8 loans totaling \$732 thousand in the Owensboro MSA
- 4 loans totaling \$511 thousand in the Kentucky Non-MSA

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables O through T in the state of Kentucky section of appendix D for the facts and data that support these conclusions.

Based on a limited-scope review, the bank's performance in the Kentucky Non-MSA is consistent with the bank's overall High Satisfactory performance rating under the Lending Test in the state of Kentucky.

INVESTMENT TEST

The bank's performance under the Investment Test in Kentucky is rated High Satisfactory. ONB made 91 investments, totaling \$8.8 million, in Kentucky. This represents 14.1 percent of allocated tier 1 capital in the state.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Owensboro KY MSA	4	5,613	41	659	45	49.4	6,272	71.0	0	0
KY Non-MSA	0	0	32	136	32	35.2	136	1.5	0	0

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

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Owensboro MSA is good. We considered the investment opportunities with direct benefit within the AA and the bank's capacity to address those needs.

Owensboro KY MSA

The bank made a significant level of qualified CD investment and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The bank exhibits adequate responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified investments total \$6.3 million, with current investments of \$447,955, prior period investments of \$5.6 million, and qualified grants of \$211,320. Qualified investments benefitting the AA represented 50.4 percent of allocated tier 1 capital.

Current investments are centered in three MBS totaling \$447,955 supporting mortgages to LMI borrowers for affordable housing. In addition, we considered the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances of \$5.6 million in municipal bonds supported revitalization and stabilization of LMI CTs in the downtown and riverfront area through construction of a convention center and surrounding infrastructure.

All grants made were to organizations supporting economic development and/or providing services benefitting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$66,668 to a local university to renovate and expand campus facilities in a low-income CT, which helped to revitalize and stabilize the area where 80 percent of the students qualify for federal aid based on income level.
- \$30,000 to an economic development organization that has facilitated economic development and job creation in the AA.
- \$21,200 to a community service organization providing shelter and assistance to the homeless.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables O through T in the state of Kentucky section of appendix D for the facts and data that support these conclusions.

Based on a limited-scope review, the bank's performance in the Kentucky Non-MSA is consistent with the bank's overall High Satisfactory performance rating under the Investment Test in the state of Kentucky.

SERVICE TEST

The bank's performance under the Service Test in Kentucky is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on the full-scope review, the bank's performance in the Owensboro KY MSA is good.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Owensboro KY MSA	19.8	4	50	0.0	50.0	25.0	25.0	3.7	24.2	46.4	25.7
Kentucky Non-MSA	74.2	4	50	0.0	0.0	75.0	25.0	0.0	3.8	64.7	31.5

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Owensboro KY MSA	0	0	0	0	0	0
Kentucky Non-MSA	0	1	0	-1	0	0

Owensboro KY MSA

ONB's branch distribution and retail service performance is adequate. The bank's branches are readily accessible to geographies and individuals of different income levels significant portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has four branches within the AA, with none in low-income CTs; there are two branches in moderate-income CTs. The percentage of the bank's branches in moderate-income CTs exceeds the percentage of population living in those CTs.

ATM distribution throughout the AA is poor. The bank has one deposit-taking ATM located in the AA, in an upper-income CT.

The opening and closing of branches have not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the assessment period, the bank did not open or close any branches in the AA.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours of 9am to noon.

The bank complements its traditional service delivery methods with certain alternative delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

Owensboro KY MSA

ONB provides a significant level of CD services in the Owensboro MSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

ONB employees from various lines of business provided technical assistance to 25 different CD organizations totaling 3,103 hours during the evaluation period. ONB staff served on boards and committees for organizations that promote affordable housing,

community services targeted to LMI individuals and families, and economic development.

Examples of some of these services include:

100 Men Who Cook - ONB's signature unique community fund raising event featuring local celebrity chefs who prepare their favorite recipes for guests to sample and enjoy. In Owensboro, the event has raised approximately \$380,000 in four years for the Cliff Hagen Boys & Girls Club (splitting with YMCA in 2018). Old National associates volunteered over 800 hours (2017-2018) to support fundraising efforts for the event. The event has created positive community impact. It was noted by the Executive Director of the Boys & Girls Club that the Wightman location, in danger of closing its doors due to lack of funding, was able to remain open thanks to the funds raised by the 100 Men Who Cook event. The Wightman unit, located in a moderate census tract, serves about 350 LMI kids and their families.

Impact 100 Owensboro - Associates served 325 hours through board involvement and financial literacy activities. IMPACT 100 Owensboro combines annual donations from a minimum of 100 members and give large grants each fall to local worthy causes selected by the members. Its mission is "To transform lives in the Greater Owensboro area through high-impact & lifelong giving." The majority of awards directly impact LMI individuals and areas.

Boulware Mission - A faith-based shelter that has been serving Owensboro and its surrounding counties. The programs help displaced individuals identify and overcome obstacles to their financial well-being and independence. Old National associates volunteered over 340 hours to support the mission through board involvement and financial literacy activities. For the last thirteen years, an Old National associate has taught weekly one-hour classes covering topics such as wants versus needs, budgeting, and credit management.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Kentucky Non-MSA was weaker than the bank's overall high satisfactory performance under the service test in Kentucky.

State Rating

State of Michigan

CRA rating for the State of Michigan:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Good responsiveness to credit needs in its AAs, considering the number and amount of home mortgage loans and loans to small businesses in its AAs;
- Adequate geographic distribution of loans in its AAs;
- Good distribution, particularly in its AAs, of loans among individuals of different income levels and businesses of different sizes;
- An adequate amount of CD loans, which had a neutral impact on lending performance;
- An excellent level of qualified CD investments and grants;
- Services do not vary in any way that inconveniences portions of the bank's AA, particularly LMI geographies and individuals; and
- A relatively high level of CD services.

Description of Institution's Operations in Michigan

ONB has nine AAs within the state of Michigan which are Ann Arbor MSA, Battle Creek MSA, Grand Rapids MSA, Jackson MSA, Kalamazoo-Portage MSA, Monroe MSA, Niles-Benton Harbor MSA, Warren-Troy-Farmington Hills MSA, and Michigan Non-MSA. ONB has \$1.4 billion in deposits representing 10.8 percent of the total bank deposits. ONB operates twenty-four branches within the state representing 12.7 percent of total number of bank offices. The bank made 21.8 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the state. The bank's primary loan products in the state of Michigan are home mortgages and small business loans.

Based on FDIC Deposit Market Share data of June 30, 2018, ONB had a 0.63 percent deposit market share in the state and is ranked 16th out of 122 banks doing business in the state. The deposits accounted for 10.8 percent of the bank's total deposits. Primary competitors include JP Morgan Chase Bank, National Association ranked first in

deposits with a market share of 20.2 percent, Comerica Bank ranked second in deposits with a market share of 13.9 percent, Bank of America, National Association ranked third in deposits with a market share of 8.9, PNC Bank, National Association ranked fourth in deposits with a market share of 8.0 percent and Fifth Third Bank ranked fifth in deposits with a market share of 7.6 percent.

For the state of Michigan, we selected four areas for a full scope review, which are Ann Arbor MSA, Grand Rapids MSA, Kalamazoo-Portage MSA, and Michigan Non-MSA.

Scope of Evaluation in Michigan

For the state of Michigan, the Ann Arbor MSA, Grand Rapids MSA, Kalamazoo/Portage MSA, and Michigan Non-MSA received full scope reviews.

Ann Arbor MSA: The AA represents 20.8 percent of total bank branches, 25.6 percent of mortgage originations, 22.1 percent of CRA loan originations, and 21.2 percent of total bank deposits.

Grand Rapids MSA: The AA represents 16.6 percent of total bank branches, 36.6 percent of mortgage originations, 34.7 percent of CRA loan originations, and 19.1 percent of total bank deposits.

Kalamazoo-Portage MSA: The AA represents 20.8 percent of total bank branches, 9.7 percent of mortgage originations, 8.2 percent of CRA loan originations, and 16.6 percent of total bank deposits.

Michigan Non-MSA: The AA represents 16.6 percent of total bank branches, 12.9 percent of mortgage originations, 13.9 percent of CRA loan originations, and 23.0 percent of total bank deposits.

Ann Arbor MI MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Ann Arbor MI MSA - 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	100	16.0	16.0	37.0	25.0	6.0
Population by Geography	354,092	14.9	12.9	40.2	27.6	4.4
Housing Units by Geography	149,098	15.8	14.1	40.5	27.5	2.0
Owner-Occupied Units by Geography	82,525	6.6	12.0	44.7	36.5	0.2
Occupied Rental Units by Geography	55,542	28.7	17.6	34.3	15.0	4.4
Vacant Units by Geography	11,031	20.0	12.6	41.1	23.1	3.2
Businesses by Geography	22,356	8.8	9.2	42.8	31.7	7.5
Farms by Geography	809	3.1	5.4	58.6	32.8	0.1
Family Distribution by Income Level	79,373	22.7	17.0	19.6	40.7	0.0
Household Distribution by Income Level	138,067	25.4	15.9	15.8	42.9	0.0
Median Family Income MSA - 11460 Ann Arbor, MI MSA		\$87,331				
2018 FFIEC AMFI		\$92,900				
			Median Gross Rent			\$1,001
			Families Below Poverty Level			8.0%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

ONB's AA of the Ann Arbor MSA consists of one county of Washtenaw. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The bank has five branches within the AA, with none in low- or moderate-income CTs. The bank has five deposit-taking ATMs located in the AA, with none in low-income CTs, and none in moderate-income CTs.

The bank's AA has 100 CTs which are 16-low-income; 16-moderate-income; 37-middle-income, 25-upper-income, and 6-NA.

Housing Characteristics

According to the 2010 U.S. Census, 55.4 percent of the total housing units in the AA were owner-occupied, and 37.2 percent were rental occupied units.

Additionally, 6.6 percent of all owner-occupied units and 28.7 percent of renter occupied units were in low-income CTs. Furthermore, 11.2 percent of all single family (1-4 unit) homes and 28.1 percent of multifamily (five plus unit) housing units were in low-income tracts.

Also, 11.9 percent of all owner-occupied units and 17.6 percent of renter occupied units were in moderate-income CTs. Furthermore, 12.5 percent of all single family (1-4 unit) homes and 18.6 percent of multifamily (five plus unit) housing units were in moderate-income tracts.

Vacant units in the AA were 9.4 and 6.6 percent for low and moderate-income CTs, respectively. The median age of AA housing stock was 51 and 46 years for low- and moderate-income CTs, respectively.

Employment

According to the BLS, the unemployment rate for this AA was 2.9 percent for January 2016, but it dropped to 2.8 percent for December 2018. The national unemployment rate for the US was 4.9 percent for January 2016, and it dropped to 3.9 percent for December 2018. The AA 2018 rate is lower than the national unemployment rate.

Housing Affordability

Qualifying for a mortgage loan in the AA with an estimated payment of \$1,961, would be a challenge for LMI borrowers, based on the following analysis. The 2018 FFIEC AMFI in the AA is \$92,900. The median housing value in the AA is \$253,825 in January 2016 and \$365,395 in December 2018 reflecting a percent change of 43.9 from January 2016 to December 2018 according to Realtor.com data. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$46,450 per year (or less than 50 percent of the 2018 FFIEC AMFI in the AA) could afford a \$216,319 mortgage with a payment of \$1,161 per month. A moderate-income borrower making \$74,320 per year (or less than 80 percent of the 2018 FFIEC AMFI in the AA) could afford a \$346,111 mortgage with a payment of \$1,858 per month.

Large Employers in the AA

AA large employers include the following: University of Michigan; Trinity Health; General Motors Milford Proving Grounds; VA Ann Arbor Healthcare Systems; Faurecia North America; Eastern Michigan University; and Thompson Reuters.

Community Contacts

The OCC conducted one community contact in the AA. The community contact was conducted with a local Affordable Housing Company, which reported the following identified needs within this community:

- Affordable Housing for LMI residents
- Financial Literacy programs

Grand Rapids MI MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Grand Rapids MI MSA - 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	128	9.4	24.2	41.4	25.0	0.0
Population by Geography	622,590	7.1	21.9	41.3	29.8	0.0
Housing Units by Geography	248,224	6.4	23.4	42.5	27.7	0.0
Owner-Occupied Units by Geography	160,040	3.1	16.9	45.3	34.8	0.0
Occupied Rental Units by Geography	72,921	12.0	36.4	38.0	13.5	0.0
Vacant Units by Geography	15,263	14.4	29.5	34.4	21.8	0.0
Businesses by Geography	35,717	4.7	18.9	37.5	38.8	0.0
Farms by Geography	1,031	1.6	11.4	46.7	40.3	0.0
Family Distribution by Income Level	154,417	20.9	17.4	21.7	40.1	0.0
Household Distribution by Income Level	232,961	23.7	17.2	18.2	40.9	0.0
Median Family Income MSA - 24340 Grand Rapids-Wyoming, MI MSA		\$65,342				
2018 FFIEC AMFI		\$70,300				
			Median Gross Rent			\$788
			Families Below Poverty Level			10.4%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

ONB's AA of the Grand Rapids MSA consists of two counties of Kent and Ottawa. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The bank has five branches within the AA, with none in low- or moderate-income CTs. The bank has six deposit-taking ATMs located in the AA, with none in low-income CTs, and none in moderate-income CTs.

The bank's AA has 128 CTs which are 12 low-income; 31 moderate-income; 53 middle-income, and 32 upper-income.

Housing Characteristics

According to the 2010 U.S. Census, 64.5 percent of the total housing units in the AA were owner occupied, and 29.4 percent were rental occupied units.

Additionally, 3.1 percent of all owner-occupied units and 12.0 percent of renter occupied units were in low-income CTs. Furthermore, 6.6 percent of all single family (1-4 unit) homes and 7.1 percent of multifamily (five plus unit) housing units were in low-income tracts.

Also, 16.9 percent of all owner-occupied units and 36.5 percent of renter occupied units were in moderate-income CTs. Furthermore, 21.0 percent of all single family (1-4 unit) homes and 34.4 percent of multifamily (five plus unit) housing units were in moderate-income tracts.

Vacant units in the AA were 13.8 and 7.7 percent for low and moderate-income CTs, respectively. The median age of AA housing stock was 70 and 56 years for low- and moderate- income CTs, respectively.

Employment

According to the BLS, the unemployment rate for this AA was 3.2 percent for January 2016, but it dropped to 2.9 percent for December 2018. The national unemployment rate for the US was 4.9 percent for January 2016, and it dropped to 3.9 percent for December 2018. The AA 2018 rate is lower than the national unemployment rate.

Housing Affordability

Qualifying for a mortgage loan in the AA with an estimated payment of \$1,503 would be a challenge for LMI borrowers, which is based on the following analysis. The 2018 FFIEC AMFI in the AA is \$70,300. The median housing value in the AA is \$194,950 in January 2016 and \$279,950 in December 2018 reflecting a percent change of 43.6 from January 2016 to December 2018 according to Realtor.com data. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$35,150 per year (or less than 50 percent of the 2018 FFIEC AMFI in the AA) could afford a \$163,695 mortgage with a payment of \$879 per month. A moderate-income borrower making \$56,240 per year (or less than 80 percent of the

2018 FFIEC AMFI in the AA) could afford a \$261,912 mortgage with a payment of \$1,406 per month.

Large Employers in the AA

AA large employers include the following: Spectrum Health; Meijer Inc.; Mercy Health; Axios Inc.; Amway Corp.; Johnson Controls Inc.; Gentex Corp.; and Perrigo Co.

Community Contacts

The OCC conducted one community contact in the AA. The community contact was conducted with a local Community Neighborhood Foundation, which reported the following identified needs within this community:

- Mortgage lending for LMI people in the area
- Consumer Loans
- Small business and Agricultural loans

Kalamazoo-Portage MI MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Kalamazoo-Portage MI MSA - 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	73	9.6	20.5	46.6	20.5	2.7
Population by Geography	332,103	8.0	16.7	51.8	21.9	1.6
Housing Units by Geography	146,886	8.3	17.5	53.8	20.2	0.3
Owner-Occupied Units by Geography	86,257	3.7	14.1	56.1	26.0	0.1
Occupied Rental Units by Geography	42,451	16.4	22.0	48.3	12.6	0.7
Vacant Units by Geography	18,178	11.5	22.5	55.6	10.0	0.4
Businesses by Geography	16,635	6.4	20.1	52.1	20.9	0.5
Farms by Geography	905	1.8	19.9	59.7	18.6	0.1
Family Distribution by Income Level	79,778	21.4	17.3	20.7	40.7	0.0
Household Distribution by Income Level	128,708	24.7	15.9	17.5	42.0	0.0
Median Family Income MSA - 28020 Kalamazoo-Portage, MI MSA		\$61,149				
2018 FFIEC AMFI		\$70,300				
			Median Gross Rent			\$715
			Families Below Poverty Level			11.7%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

ONB's AA of the Kalamazoo/Portage MSA consists of two counties of Kalamazoo and Van Buren. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

We noted that the bank exited the Van Buren County market within the MSA in June 2018 because of a banking center closing.

The bank has four branches within the AA, with one in a low-income CT and one branch in a moderate-income CT. The bank has five deposit-taking ATMs located in the AA, two located in a low-income CT and one in a moderate-income CT.

The bank's AA has 73 CTs which are 7 low-income; 15 moderate-income; 34 middle-income, 15 upper-income, and 2 NA.

Housing Characteristics

According to the 2010 U.S. Census, 58.7 percent of the total housing units in the AA were owner-occupied, and 28.9 percent were rental occupied units.

Additionally, 3.7 percent of all owner-occupied units and 16.4 percent of renter occupied units were in low-income CTs. Furthermore, 6.2 percent of all single family (1-4 unit) homes and 18.2 percent of multifamily (five plus unit) housing units were in low-income tracts.

Also, 14.2 percent of all owner-occupied units and 21.9 percent of renter occupied units were in moderate-income CTs. Furthermore, 16.9 percent of all single family (1-4 unit) homes and 17.5 percent of multifamily (five plus unit) housing units were in moderate-income tracts.

Vacant units in the AA were 17.1 and 15.9 percent for low and moderate-income CTs, respectively. The median age of AA housing stock was 57 and 58 years for low- and moderate-income CTs, respectively.

Employment

According to the BLS, the unemployment rate for this AA was 4.1 percent for January 2016, but it dropped to 3.7 percent for December 2018. The national unemployment rate for the US was 4.9 percent for January 2016, and it dropped to 3.9 percent for December 2018. The AA 2018 rate is lower than the national unemployment rate.

Housing Affordability

Qualifying for a mortgage loan in the AA with an estimated payment of \$1,267, would be a challenge for low-income borrowers, which is based on the following analysis conducted. The 2018 FFIEC AMFI in the AA is \$70,300. The median housing value in the AA is \$154,950 in January 2016 and \$235,950 in December 2018 reflecting a percent change of 52.3 from January 2016 to December 2018 according to Realtor.com data. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$35,150 per year (or less than 50 percent of the 2018 FFIEC AMFI in the AA) could afford a \$163,695 mortgage with a payment of \$879 per month. A moderate-income borrower making \$56,240 per year (or less than 80 percent of the 2018 FFIEC AMFI in the AA) could afford a \$261,912 mortgage with a payment of \$1,406 per month.

Large Employers in the AA

AA large employers include the following: Bronson Methodist Hospital; Ascension Borgess Hospital; Western Michigan University; Pfizer; Stryker Corp; PNC Bank; MPI International; and Meijer Inc.

Community Contacts

The OCC conducted one-community contact in the AA. The community contact was conducted with a local Economic Development Office, which reported the following identified needs within this community:

- Affordable Housing for LMI residents
- Financial Literacy programs
- Small dollar business loans
- City programs to fund transportation need and development
- Inter-city Micro Lending programs

Michigan Non-MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Michigan Non-MSA - 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.0	17.4	56.5	26.1	0.0
Population by Geography	98,902	0.0	15.1	53.2	31.7	0.0
Housing Units by Geography	43,412	0.0	15.4	55.7	28.9	0.0
Owner-Occupied Units by Geography	29,180	0.0	10.2	56.4	33.5	0.0
Occupied Rental Units by Geography	8,784	0.0	33.4	45.6	21.0	0.0
Vacant Units by Geography	5,448	0.0	14.6	68.4	17.0	0.0
Businesses by Geography	4,640	0.0	18.4	53.6	28.0	0.0
Farms by Geography	490	0.0	2.7	62.9	34.5	0.0
Family Distribution by Income Level	25,134	16.4	17.4	20.7	45.6	0.0
Household Distribution by Income Level	37,964	19.7	15.6	18.5	46.2	0.0
Median Family Income Non- MSAs – MI		\$53,542				
2018 FFIEC AMFI		\$58,700				
			Median Gross Rent			\$739
			Families Below Poverty Level			9.6%
Source: 2015 ACS Census and 2018 D&B Data						
Due to rounding, totals may not equal 100.0						
(*) The NA category consists of geographies that have not been assigned an income classification.						

ONB's AA of the Michigan Non-MSA consists of Lenawee County. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The bank has four branches within the AA, with one branch located in a moderate-income CT. There are no low-income CTs in the AA. The bank has four deposit-taking ATM located in the AA, with one located in a moderate-income CT.

The bank's AA has 23 CTs which are 0 low-income; 4 moderate-income; 13 middle-income, and 6 upper-income.

Housing Characteristics

According to the 2010 U.S. Census, 67.2 percent of the total housing units in the AA were owner-occupied, and 20.2 percent were rental occupied units.

Also, 10.2 percent of all owner-occupied units and 33.4 percent of renter occupied units were in moderate-income CTs. Furthermore, 13.0 percent of all single family (1-4 unit) homes and 44.5 percent of multifamily (five plus unit) housing units were in moderate-income tracts.

Vacant units in the AA were 11.9 percent for moderate-income CTs, respectively. The median age of AA housing stock 62 years for moderate income CTs, respectively.

Employment

According to the BLS, the unemployment rate for this AA was 5.1 percent for January 2016, but it dropped to 4.1 percent for December 2018. The national unemployment rate for the US was 4.9 percent for January 2016, and it dropped to 3.9 percent for December 2018. The AA 2018 rate is slightly higher than the national unemployment rate fueled by the slow rebuilding of the Detroit and related markets.

Housing Affordability

Qualifying for a mortgage loan in the AA with an estimated payment of \$805, would be a challenge for low-income borrowers, which is based on the following analysis. The 2018 FFIEC AMFI in the AA is \$58,700. The median housing value in the AA is \$119,900 in January 2016 and \$149,900 in December 2018 reflecting a percent change of 25.1 from January 2016 to December 2018 according to Zillow.com data. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$29,350 per year (or less than 50 percent of the 2018 FFIEC AMFI in the AA) could afford a \$136,684 mortgage with a payment of \$734 per month. A moderate-income borrower making \$46,960 per year (or less than 80 percent of the 2018 FFIEC AMFI in the AA) could afford a \$218,695 mortgage with a payment of \$1,174 per month.

Large Employers in the AA

AA large employers include the following: FCA US LLC; CMS Energy Corp.; Detroit Public Schools Community District; Trinity Health, Magna International of America; Spectrum Health System; University of Michigan; and General Motors Co.

Community Contacts

The OCC conducted one community contact in the AA. A community contact was conducted with a local Economic Development Office, which reported the following identified needs within this community:

- Affordable Housing for LMI residents
- Financial Literacy programs
- Small business lending

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

LENDING TEST

The bank's performance under the Lending Test in the state of Michigan is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Grand Rapids MSA, Kalamazoo/Portage MSA, and Michigan Non-MSA are good. The bank's performance in the Ann Arbor MSA is adequate. We considered the factors discussed in describing the bank's operation in the state above.

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans*	% State Deposits
Ann Arbor MSA	1,167	356	2	4	1,529	26.0%	21.2%
Battle Creek MSA	99	47	0	3	149	2.5%	5.1%
Grand Rapids-Wyoming MSA	1,366	534	1	3	1,904	32.4%	19.1%
Jackson MSA	164	24	0	0	188	3.2%	4.8%
Kalamazoo-Portage MSA	440	132	1	5	578	9.8%	16.6%
Michigan Non MSA	587	220	6	1	814	13.9%	23.0%
Monroe MSA	140	83	2	1	226	3.8%	4.5%
Niles-Benton Harbor MSA	68	40	0	1	109	1.9%	3.7%
Warren-Troy-Farmington Hills MD	232	144	0	2	378	6.4%	2.0%
*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.							

Dollar Volume of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans*	% State Deposits
Ann Arbor MSA	\$327,354	\$85,511	\$177	\$499	\$413,541	29.4%	21.2%
Battle Creek MSA	\$10,466	\$6,213	\$0	\$10,365	\$27,044	1.9%	5.1%
Grand Rapids-Wyoming MSA	\$304,719	\$105,058	\$497	\$3,303	\$413,577	29.4%	19.1%
Jackson MSA	\$22,374	\$3,171	\$0	\$0	\$25,545	1.8%	4.8%
Kalamazoo-Portage MSA	\$82,236	\$35,293	\$10	\$18,205	\$135,744	9.7%	16.6%
Michigan Non MSA	\$191,856	\$32,640	\$966	\$1,142	\$226,604	16.1%	23.0%
Monroe MSA	\$18,178	\$16,861	\$66	\$1,450	\$36,555	2.6%	4.5%
Niles-Benton Harbor MSA	\$12,562	\$9,473	\$0	\$8,064	\$30,099	2.1%	3.7%
Warren-Troy-Farmington Hills MD	\$62,911	\$27,915	\$0	\$6,695	\$97,521	6.9%	2.0%
*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.							

Ann Arbor MSA

The bank lending activity in the AA is adequate.

According to FDIC Deposit Market Share data as of June 30, 2018, ONB had \$290.3 million in deposits with a deposit market share of 3.3 percent. ONB ranked ninth in total deposits out of 19 banks in the AA.

According to 2018 peer mortgage data, ONB ranked in the top two percent of lenders, fifth out of 341 lenders, originating home mortgage loans in the AA. The bank's market share of 3.6 percent and rank in loans is stronger than the bank's deposit market share and rank in deposits. The remaining four largest mortgage lenders have captured 23.1 percent of the market. The top lenders are Quicken Loans Inc. with a market share of 6.7 percent, Wells Fargo Bank, National Association with a market share of 6.1 percent, JP Morgan Chase Bank, National with a market share of 5.9 percent and The Huntington National Bank with a market share of 4.4 percent.

According to 2017 peer small business data, ONB ranked 12th out of 80 lenders originating small business loans in the AA. The bank's market share of 1.7 percent and rank in loans is weaker than the bank's deposit market share and rank in deposits. The five largest small business lenders have captured 63 percent of the market. The top small business lenders are American Express with a market share of 25.1 percent, Chase Bank USA, NA with a market share of 15.2 percent, PNC Bank NA with a market

share of 8.9 percent, Capital One Bank (USA) NA with a market share of 7.3 percent and US Bank, NA with a market share of 6.5 percent.

Grand Rapids MSA

The bank lending activity in the AA is good.

According to FDIC Deposit Market Share data as of June 30, 2018, ONB had \$260.9 million in deposits with a deposit market share of 1.6 percent. ONB ranked 15th in total deposits out of 26 banks in the AA.

According to 2018 peer mortgage data, ONB ranked in the top four percent of lenders, 14th out of 367 lenders, originating home mortgage loans in the AA. The bank's market share of 1.5 percent and rank in loans is near to the bank's market share and rank in deposits. The five largest mortgage lenders have captured 38.7 percent of the market. The top lenders are Lake Michigan Credit Union with a market share of 20.1 percent, The Huntington National Bank with a market share of 6.6 percent, Amerifirst Financial Corporation with a market share of 5.0 percent, JP Morgan Chase Bank, National with a market share of 3.7 percent and Quicken Loans, Inc. with a market share of 3.3 percent.

According to 2017 peer small business data, ONB ranked 16th out of 86 lenders originating small business loans in the AA. The bank's market share of 1.5 percent and rank in loans is near to the bank's deposit market share and rank in deposits. The five largest small business lenders have captured 48.5 percent of the market. The top small business lenders are American Express, FSB with a market share of 14.3 percent, Chase Bank USA, NA with a market share of 13.3 percent, Capital One Bank (USA), NA with a market share of 8.4 percent, Chemical Bank with a market share 6.7 percent and Citibank, NA, with a market share of 5.8 percent.

The level of small farm loans was below the 20 loans needed for review and analysis.

Kalamazoo-Portage MSA

The bank lending activity in the AA is poor.

According to FDIC Deposit Market Share data as of June 30, 2018, ONB had \$227.6 million in deposits with a deposit market share of 5.6 percent. ONB ranked seventh in total deposits out of 16 banks in the AA.

According to 2018 peer mortgage data, ONB ranked in the top five percent of lenders, 14th out of 326 lenders, originating home mortgage loans in the AA. The bank's market share of 1.7 percent and rank in loans is weaker than the bank's deposit market share and rank in deposits. The five largest mortgage lenders have captured 34.3 percent of the market. The top lenders are Consumers with a market share of 10.5 percent, Lake Michigan Credit Union with a market share of 10.3 percent, Arbor Financial with a market share of 5.3 percent, Quicken Loans, Inc., with a market share of 4.3 percent and Amerifirst Financial Corporation with a market share of 3.9 percent.

According to 2017 peer small business data, ONB ranked 20th out of 67 lenders originating small business loans in the AA. The bank's market share of 1.1 percent and rank in loans is weaker than the bank's deposit market share and rank in deposits. The five largest small business lenders have captured 55.4 percent of the market. The top small business lenders are PNC Bank, NA with a market share of 16.9 percent, American Express, FSB with a market share of 14.6 percent, Citibank, NA with a market share of 8.8 percent, Capital One Bank (USA), NA with a market share of 8.0 percent and Chase Bank USA, NA with a market share of 7.1 percent.

Michigan Non-MSA

The bank lending activity in the AA is adequate.

According to FDIC Deposit Market Share data as of June 30, 2018, ONB had \$314.5 million in deposits with a deposit market share of 30.7 percent. ONB ranked first in total deposits out of nine banks in the AA.

According to 2018 peer mortgage data, ONB ranked in the top two percent of lenders, fourth out of 192 lenders, originating home mortgage loans in the AA. The bank's market share of 7 percent and rank in loans is weaker than the bank's deposit market share and rank in deposits. The remaining four largest mortgage lenders have captured 32.6 percent of the market. The four largest mortgage lenders are TLC Community Credit Union with a market share of 11.3 percent, The Huntington National Bank with a market share of 7.7 percent, First Federal Bank of the Midwest with a market share of 7.2 percent and Quicken Loans Inc. with a market share of 6.4 percent.

According to 2017 peer small business data, ONB ranked 5th out of 48 lenders originating small business loans in the AA. The bank's market share of 6.8 percent is weaker than the bank's deposit market share and rank in deposits. The remaining four largest small business lenders have captured 46.9 percent of the market. The top small business lenders are American Express, FSB with a market share of 16.6 percent, Capital One Bank (USA), NA with a market share of 12.4 percent, Citibank, NA with a market share of 9.7 percent and Synchrony Bank with a market share of 8.2 percent.

The level of small farm loans was below the 20 loans needed for review and analysis.

Distribution of Loans by Income Level of the Geography

During the evaluation period, the overall geographic distribution of loans was adequate. The geographic distribution of home mortgage loans and small business was adequate.

Home Mortgage Loans

During the evaluation period, the distribution of the bank's home mortgage lending was adequate.

Refer to Table O in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Ann Arbor MSA

The geographic distribution of home mortgage loans was very poor.

The distribution of the bank's home mortgage lending in 2018 was very poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in LMI CTs. The proportion of loans was significant below the aggregate distribution in LMI CTs.

During the 2017 analysis period, the performance was good. The proportion of loans exceeded the percentage of owner-occupied housing units in low-income CTs and was below the percentage in moderate-income CTs. The proportion of loans exceeded the aggregate distribution in low-income CTs and was well below the aggregate distribution in moderate-income CTs.

During the 2016 analysis period, the performance was very poor. The proportion of loans was significant below the percentage of owner-occupied housing units in LMI CTs. The proportion of loans was below the aggregate distribution in low-income CTs and was significantly below the aggregate distribution in moderate-income CTs.

Grand Rapids MSA

The geographic distribution of home mortgage loans was adequate.

The distribution of the bank's home mortgage lending in 2018 was good. The proportion of loans was near to the percentage of owner-occupied housing units in low-income CTs and below the percentage in moderate-income CTs. The proportion of loans was below the aggregate distribution in low-income CTs and well below the aggregate distribution in moderate-income CTs.

During the 2017 analysis period, the performance was adequate. The proportion of loans was below the percentage of owner-occupied housing units in low-income CTs and was near to the percentage in moderate-income CTs. The proportion of loans was below the aggregate distribution in LMI CTs.

During the 2016 analysis period, the performance was adequate. The proportion of loans was near to the percentage of owner-occupied housing units in low-income CTs and was significantly below the percentage in moderate-income CTs. The proportion of loans exceeded the aggregate distribution in low-income CTs and was significantly below the aggregate distribution in moderate-income CTs.

Kalamazoo-Portage MSA

The geographic distribution of home mortgage loans was adequate.

During the 2018 analysis period, the distribution of the bank's home mortgage lending in 2018 was adequate. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income CTs and below the percentage in moderate-income CTs. The proportion of loans was below the aggregate distribution in LMI CTs.

During the 2017 analysis period, the performance was adequate. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income CTs and was below the percentage in moderate-income CTs. The proportion of loans was well below the aggregate distribution in low-income CTs and was below the aggregate distribution in moderate-income CTs.

During the 2016 analysis period, the performance was poor. The proportion of loans was well below the percentage of owner-occupied housing units in low-income CTs and was significantly below the percentage in moderate-income CTs. The proportion of loans exceeded the aggregate distribution in low-income CTs and was well below the aggregate distribution in moderate-income CTs.

Michigan Non-MSA

The geographic distribution of home mortgage loans was adequate. Conclusions are based on performance in moderate income CTs as there are no low-income CTs in the AA.

The distribution of the bank's home mortgage lending in 2018 was very poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in moderate-income CTs. The proportion of loans was significantly below the aggregate distribution in moderate-income CTs.

During the 2017 analysis period, the performance was excellent. The proportion of loans exceeded the percentage of owner-occupied housing units in and the aggregate distribution in moderate-income CTs.

During the 2016 analysis period, the performance was adequate. The proportion of loans was significantly below the percentage of owner-occupied housing units and the aggregate distribution in moderate-income CTs.

Small Loans to Businesses

The geographic distribution of the bank's originations and purchases of small loans to businesses was adequate.

Refer to Table Q in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Ann Arbor MSA

The overall geographic distribution in the AA is poor.

During the 2018 analysis period, the distribution of small loans to businesses in LMI CTs was adequate. The proportion of loans was below the percentage of businesses in low-income CTs and was well below the percentage of businesses in moderate-income CTs. The proportion of small loans to businesses in low-income CTs was somewhat below the aggregate distribution of loans in those CTs and was well below the distribution of loans in moderate-income CTs.

During the 2017 analysis period, the performance was poor. The proportion of small loans to businesses in LMI CTs was well below the percentage of businesses in LMI CTs. The proportion of small loans to businesses was significantly below the aggregate distribution of businesses in LMI CTs.

During the 2016 analysis period, the performance was poor. The proportion of small loans to businesses in LMI CTs was well below the percentage of businesses in LMI CTs. The proportion of small loans to businesses was significantly below the aggregate distribution of businesses in LMI CTs.

Grand Rapids MSA

The overall geographic distribution in the AA is good.

During the 2018 analysis period, the distribution of small loans to businesses in LMI CTs was good. The proportion of loans exceeded the percentage of businesses in low-income CTs and was below the percentage of businesses in moderate-income CTs. The proportion of small loans to businesses in low-income CTs exceeded the aggregate distribution of loans in those CTs and was below the distribution of loans in moderate-income CTs.

During the 2017 analysis period, the performance was adequate. The proportion of loans was below the percentage of businesses in LMI CTs. The proportion of small loans to businesses in low-income CTs was well below the aggregate distribution of loans in those CTs and was below the distribution of loans in moderate-income CTs.

During the 2016 analysis period, the performance was excellent. The proportion of loans was below the percentage of businesses in low-income CTs and exceeded the percentage of businesses in moderate-income CTs. The proportion of small loans to businesses in low-income CTs was near to the aggregate distribution of loans in those CTs and exceeded the distribution of loans in moderate-income CTs.

Kalamazoo-Portage MSA

The overall geographic distribution in the AA is very poor.

During the 2018 analysis period, the distribution of small loans to businesses in LMI CTs was adequate. The proportion of loans exceeded the percentage of businesses in low-income CTs and was well below the percentage of businesses in moderate-income CTs. The proportion of small loans to businesses in low-income CTs exceeded the aggregate distribution of loans in those CTs and was significantly below the distribution of loans in moderate-income CTs.

During the 2016 and 2017 analysis periods, the performance was very poor. The proportion of loans was well below the percentage of businesses and the aggregate distribution in low-income CTs. The proportion of loans was significantly below the percentage of businesses and the aggregate distribution in moderate-income CTs.

Michigan Non-MSA

The overall geographic distribution in the AA is good. Conclusions are based on performance in moderate income CTs as there are no low-income CTs in the AA.

During the 2018 analysis period, the distribution of small loans to businesses in LMI CTs was good. The proportion of loans was near to the percentage of businesses in moderate-income CTs. The proportion of small loans to businesses in moderate-income CTs was near to the aggregate distribution of loans in those CTs.

During the 2017 analysis period, the performance was excellent. The proportion of loans exceeded the percentage of businesses and the aggregate distribution of loans in middle-income CTs.

During the 2016 analysis period, the performance was good and consistent with 2018.

Small Loans to Farms

Small loans to farms were not a primary loan product in the state. The bank did not originate or purchase a sufficient volume of small farm loans during any of the analysis periods to enable a meaningful analysis of the bank's performance in the rating area.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed ONB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

During the evaluation period, the overall borrower distribution of loans was good. The borrower distribution of home mortgage loans was adequate and small business was good.

Home Mortgage Loans

The distribution of the bank's home mortgage loans to LMI borrowers was adequate.

Refer to Table P in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Ann Arbor MSA

The distribution of the bank's home mortgage loans to LMI borrowers was adequate.

During the 2018 analysis period, the distribution of the bank's home mortgage lending was adequate. The proportion of loans was well below the percentage of low-income families and near to the percentage of moderate-income families. The proportion of loans was well below the aggregate distribution of loans to LMI families.

During the 2016 and 2017 analysis periods, the performance was adequate. The proportion of loans was well below the percentage of low-income families and near to the percentage of moderate-income families. The proportion of loans was well below the aggregate distribution of loans to low-income families and was below the aggregate distribution to moderate-income families.

Grand Rapids MSA

The distribution of the bank's home mortgage loans to LMI borrowers was poor.

During the 2018 analysis period, the distribution of the bank's home mortgage lending in 2018 was poor. The proportion of loans was well below the percentage of low-income families and near to the percentage of moderate-income families. The proportion of loans was significantly below the aggregate distribution of loans to low-income families and was well below the aggregate distribution to moderate-income families.

During the 2017 analysis period, the performance was adequate. The proportion of loans was well below the percentage of low-income families and near to the percentage of moderate-income families. The proportion of loans was below the aggregate distribution of loans to low-income families and was below the aggregate distribution to moderate-income families.

During the 2016 analysis period, the performance was poor. The proportion of loans was well below the percentage of low-income families and near to the percentage of moderate-income families. The proportion of loans was significantly below the aggregate distribution of loans to low-income families and was well below the aggregate distribution to moderate-income families

Kalamazoo-Portage MSA

The distribution of the bank's home mortgage loans to LMI borrowers was good.

During the 2018 analysis period, the distribution of the bank's home mortgage lending in 2018 was good. The proportion of loans was below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans was below the aggregate distribution of loans to LMI families.

During the 2017 analysis period, the performance was good. The proportion of loans was well below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans was near to the aggregate distribution of loans to low-income families and exceeded the aggregate distribution to moderate-income families.

During the 2016 analysis period, the performance was adequate. The proportion of loans was well below the percentage of low-income families and near to the percentage of moderate-income families. The proportion of loans was well below the aggregate distribution of loans to low-income families and was below the aggregate distribution to moderate-income families.

Michigan Non-MSA

The distribution of the bank's home mortgage loans to LMI borrowers was excellent.

During the 2018 analysis period, the distribution of the bank's home mortgage lending in 2018 was good. The proportion of loans was well below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans was significantly below the aggregate distribution of loans to low-income families and exceeded the aggregate distribution to moderate-income families.

During the 2016 and 2017 analysis periods, the performance was excellent. The proportion of loans was below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to LMI families.

Small Loans to Businesses

The borrower distribution of the bank's originations and purchases of small loans to businesses by revenue was good.

Refer to Table R in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Ann Arbor MSA

The overall distribution of bank small loans to businesses by gross annual revenues was adequate.

During the 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was adequate. The proportion of loans was well below the percentage of small businesses and below the aggregate distribution of loans to those businesses.

During the 2017 analysis period, the performance was adequate. The proportion of loans was well below the percentage of small businesses and near to the aggregate distribution of loans to those businesses.

During the 2016 analysis period, the performance was good. The proportion of loans was well below the percentage of small businesses and exceeded the aggregate distribution of loans to those businesses.

Grand Rapids MSA

The overall distribution of bank small loans to businesses by gross annual revenues was good.

During the 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was good. The proportion of loans was well below the percentage of small businesses and was near to the aggregate distribution of loans to those businesses.

During the 2017 analysis period, the distribution of the bank's small loans to businesses by revenue was good. The proportion of loans was well below the percentage of small businesses and exceeded the aggregate distribution of loans to those businesses.

During the 2016 analysis period, the distribution of the bank's small loans to businesses by revenue was good. The proportion of loans was well below the percentage of small businesses and exceeded the aggregate distribution of loans to those businesses.

Kalamazoo-Portage MSA

The overall distribution of bank small loans to businesses by gross annual revenues was adequate.

During the 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was poor. The proportion of loans was significantly below the percentage of

small businesses and well below the aggregate distribution of loans to those businesses.

During the 2017 analysis period, the performance was adequate. The proportion of loans was well below the percentage of small businesses and near to the aggregate distribution of loans to those businesses.

During the 2016 analysis period, the performance was good. The proportion of loans was below the percentage of small businesses and exceeded the aggregate distribution of loans to those businesses.

Michigan Non-MSA

The overall distribution of bank small loans to businesses by gross annual revenues was good.

During the 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was adequate. The proportion of loans was well below the percentage of small businesses and near to the aggregate distribution of loans to those businesses.

During the 2016 and 2017 analysis periods, the performance was good. The proportion of loans was well below the percentage of small businesses and exceeded the aggregate distribution of loans to those businesses.

Small Loans to Farms

Small loans to farms were not a primary loan product in the state. The bank did not originate or purchase a sufficient volume of small farm loans during each analysis period to enable a meaningful analysis of the bank's performance in the rating area.

Community Development Lending

The bank made an adequate level of CD loans, which had a neutral impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Ann Arbor MSA

ONB originated four CD loans totaling \$499 thousand, representing 1.3 percent of allocated tier 1 capital. CD loans originated exhibited adequate responsiveness to the credit and community needs in the AA. Loans supported various multifamily affordable housing complexes in the AA.

Grand Rapids MSA

ONB originated three CD loans totaling \$3.3 million, representing 9.4 percent of allocated tier 1 capital. CD loans originated exhibited adequate responsiveness to the credit and community needs in the AA. Loans supported affordable housing and community services to LMI in the AA.

Examples of CD loans originated during the evaluation period include:

- \$500 thousand loan to a nonprofit, which supports to efficiently acquire, hold, manage, spur economic development, and/or sell foreclosed properties in the AA.
- \$2.8 million construction line of credit for an affordable housing LIHTC project that will include 24 rental units.

Kalamazoo-Portage MSA

ONB originated five CD loans totaling \$18.2 million, representing 59.6 percent of allocated tier 1 capital. CD loans originated exhibited excellent responsiveness to the credit and community needs in the AA. Loans supported revitalization/stabilization in the AA.

Examples of CD loans originated during the evaluation period include:

- \$15 million in three lines of credit for the construction of a mixed-use apartment, commercial, parking, and retail building. The project is in a central business district, as part of a Building Revitalization Program (BRP) and a TIF district, which will create new jobs in the community for LMI individuals.
- \$3.2 million in two lines of credit to purchase an existing grocery store, which was previously closed. The only grocery store in the neighborhood left residents scrambling to find a new food source for LMI residents. The project will create and retain jobs benefitting LMI people.

Michigan Non-MSA

ONB originated one CD loan totaling \$1.3 million and representing 3.2 percent of allocated tier 1 capital. CD loans originated exhibited adequate responsiveness to the credit and community needs in the AA. The construction loan retail building is to be occupied by a restaurant franchise. The project was part of the community's redevelopment authority, which redevelops areas that are difficult to use because of environmental challenges and uses incentives such as loans and grants to encourage developers to utilize, revitalize, and stabilize.

State of Michigan

In addition, ONB originated five CD loans totaling \$30.8 million. Loans supported affordable housing, economic development, and revitalization/stabilization in the AA. The loans were considered impactful to the state and had a positive impact on lending performance in the rating area.

Product Innovation and Flexibility

The bank makes little use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the “Other Performance” section under the Scope of the Evaluation section for additional details regarding other programs.

ONB works in conjunction with the Michigan State Housing Development Authority (MSHDA) to offer affordable housing assistance programs to first time and other qualified homebuyers. These affordable loan products are offered under the agency’s programs, which may include DPA, closing cost assistance, and tax credits. ONB leveraged these programs to originate 11 loans totaling \$1 million within the AAs during the evaluation period. The following is a breakdown of the loans by AA:

- 9 loans totaling \$756 thousand in the Michigan Non-MSA
- 1 loan totaling \$182 thousand in the Grand Rapids MSA
- 1 loan totaling \$86 thousand in the Kalamazoo/Portage MSA

Conclusions for Areas Receiving Limited-Scope Reviews

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

Based on limited-scope reviews, the bank’s performance in the Monroe MSA, Niles-Benton Harbor MSA, and Warren-Troy-Farmington Hills MSA is consistent with the bank’s overall High Satisfactory performance rating under the Lending Test in the state of Michigan. Performance in the Battle Creek MSA and Jackson MSA is weaker than the state of Michigan rating. Performance differences are due to the weaker level of HMDA geographic distribution and borrower distribution in the AAs. Weaker performance did not negatively impact conclusions about the bank’s performance in the state.

INVESTMENT TEST

The bank’s performance under the Investment Test in Michigan is rated Outstanding. ONB made 370 investments, totaling \$36.4 million, in Michigan. This represents 19.8 percent of allocated tier 1 capital in the state. The bank’s performance was enhanced by \$6.0 million in statewide investments, which also impacted the bank’s AAs.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Ann Arbor MI MSA	0	0	85	7,803	85	23.0	7,803	21.4	0	0
Battle Creek MI MSA	0	0	23	160	23	6.2	160	0.4	0	0
Grand Rapids MI MSA	1	206	91	3,411	92	24.9	3,617	9.9	0	0
Jackson MI MSA	0	0	7	18,100	7	1.9	18,100	0.1	0	0
Kalamazoo/Portage MI MSA	0	0	75	752	75	20.2	752	2.1	0	0
Monroe MI MSA	0	0	8	534	8	2.2	534	1.5	0	0
Niles-Benton Harbor MI MSA	5	2,957	9	32	14	3.8	2,989	8.2	0	0
Warren-Troy-Farmington Hills MI MSA	0	0	15	1,872	15	4.0	1,872	5.1	0	0
MI Non-MSA (including Lenawee)	1	101	46	1,329	47	12.7	1,430	3.9	0	0
MI – Statewide	3	5,963	0	0	3	0.8	5,963	16.4	0	0
MI - Outside AA	0	0	1	11,279	1	0.3	11,279	31.0	0	0

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

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

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance in the full-scope AAs is High Satisfactory. Based on full-scope reviews, the bank's performance in the Ann Arbor MSA is excellent. The bank's performance in the Grand Rapids-Wyoming MSA is good. The bank's performance in the Kalamazoo-Portage MSA and MI Non MSA is adequate.

Ann Arbor MSA

The bank has a significant level of qualified investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits excellent responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$7.8 million, with current investments of \$7.5 million and qualified grants of \$261 thousand. Investments benefiting the AA during the evaluation represented 20.0 percent of allocated tier 1 capital.

Investments are centered in a \$5 million equity investment in a low-income housing tax credit fund that financed an apartment building for low-income senior citizens and 12 MBS totaling \$2.5 million supporting mortgages to LMI borrowers for affordable housing in the AA.

All grants made were to organizations supporting economic development and/or providing services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$48,500 to a nonprofit organization that provides funding to other organizations providing community services to LMI individuals and families in the AA.
- \$37,550 to five community service organizations providing shelter and assistance to the homeless and homelessness prevention programs.
- \$30,000 to a nonprofit organization providing affordable housing and financial literacy education for LMI families in the AA.
- \$20,000 to an economic development organization providing support for start-up small businesses in the AA.

Grand Rapids MSA

The bank has a significant level of qualified investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$3.6 million, with current investments of \$3.1 million, prior period investments of \$206,357, and qualified grants of \$270,299. Investments benefiting the AA during the evaluation represented 10.3 percent of allocated tier 1 capital.

Investments are centered in 17 MBS totaling \$3.1 million supporting mortgages to LMI borrowers for affordable housing in the AA. In addition, we considered the ongoing impact of investments made prior to the current evaluation period within the AA. A municipal bond with a remaining balance of \$206,357 funded improvements to public schools in Wyoming, MI, where more than 50 percent of students participate in free or reduced lunch programs.

All grants made were to organizations supporting economic development and/or providing services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$71,500 to four nonprofit organizations providing shelter, education, and assistance to the homeless, particularly homeless youth.

- \$20,500 to a nonprofit organization that provides funding to other community service organizations benefiting LMI individuals and families in the AA.
- \$15,000 to an economic development organization facilitating business development and job creation within the AA.

Kalamazoo-Portage MSA

The bank has an adequate level of qualified investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$752 thousand, with current investments of \$417 thousand and qualified grants of \$335 thousand. Investments benefiting the AA during the evaluation represented 2.5 percent of allocated tier 1 capital. Investments are primarily centered in a CRA qualified investment bond fund totaling \$417 thousand supporting affordable housing in the AA.

All grants made were to organizations supporting economic development and/or providing services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$61,329 to two community service organizations providing after-school programs for LMI youth.
- \$58,750 to an economic development organization that facilitates business development and job creation in the AA.
- \$50,000 to two community service organizations providing health services to LMI families.
- \$25,000 to a local college supporting small business and farm food development and distribution within the AA.
- \$22,000 to a community service organization providing shelter and assistance to the homeless.

Michigan Non-MSA

The bank has an adequate level of qualified investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community

economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$1.4 million, with current investments of \$1.2 million, prior period investments of \$100,818 and qualified grants of \$163,041. Investments benefiting the AA during the evaluation represented 3.4 percent of allocated tier 1 capital.

Investments are primarily centered in a CRA qualified investment bond fund totaling \$1.2 million supporting affordable housing in the AA. In addition, we considered the ongoing impact of an investment made prior to the current evaluation period within the AA. A Recovery Zone Economic Development bond with an outstanding balance of \$100,818 funded construction of a municipal complex in Adrian, MI. The project helped to revitalize and stabilize a moderate-income CT.

All grants made were to organizations supporting economic development and/or providing services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$50,000 to a nonprofit organization supporting revitalization and stabilization of moderate-income CTs within the AA. The project will rehabilitate and repurpose for mixed use commercial buildings in downtown Adrian and create opportunities for youth education programs in the community.
- \$39,300 to two organizations that provide funding to other community service organizations benefiting LMI individuals and families in the AA.
- \$30,000 to an economic development organization that facilitates business development and job creation within the AA.

Statewide

ONB made a \$4.5 million equity investment to support statewide economic development, including benefit to the MI AAs. The investment demonstrates innovation and complexity as it facilitates attractively priced growth capital in the form of subordinated/mezzanine debt to small businesses in MI.

In addition, we considered the ongoing impact of investments made prior to the current evaluation period that include benefit to the MI AAs. There are two equity investments in low-income housing tax credit funds with a remaining balance of \$1.5 million that support affordable housing developments in MI.

Other

ONB also has an \$11.3 million equity investment in a low-income housing tax credit apartment complex that provides affordable housing for homeless persons and families in Marquette, MI, that does not benefit the MI AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Monroe, MI MSA, Niles-Benton Harbor, MI MSA, and Detroit Warren-Livonia, MI MSA is stronger than the bank's overall performance under the Investment Test in the full-scope areas and is considered excellent. The bank's performance under the Investment Test in the Battle Creek, MI MSA and Jackson, MI MSA is weaker than the bank's overall performance under the Investment Test in the full-scope areas due to limited investments or grants. Performance in the Battle Creek, MI MSA is considered poor and, in the Jackson, MI MSA is very poor.

Based on a limited-scope review, the bank's performance in the Michigan limited scope AAs is consistent with the bank's overall performance rating under the Investment Test in the state of Michigan.

SERVICE TEST

The bank's performance under the Service Test in Michigan is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Ann Arbor, MI MSA is poor; in the Grand Rapids, MI MSA, it is poor; in the Kalamazoo-Portage, MI MSA, it is excellent; and in the Michigan Non-MSA, it is excellent.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	Branches					Population			
			% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Ann Arbor MI MSA	21.2	5	20.8	0.0	0.0	60.0	40.0	14.9	12.9	40.2	32.0
Battle Creek MI MSA	5.1	1	4.2	0.0	0.0	0.0	100.0	7.4	26.5	39.2	26.9
Grand Rapids MI MSA	19.1	5	16.7	0.0	0.0	60.0	40.0	7.1	21.9	41.3	29.7
Jackson MI MSA	4.7	1	4.2	0.0	100.0	0.0	0.0	9.9	19.4	47.40	23.3
Kalamazoo/Portage MI MSA	16.7	4	20.8	25.0	25.0	50.0	0.0	8.0	16.7	51.8	23.5
Monroe MI MSA	4.4	1	4.2	0.0	0.0	100.0	0.0	1.1	13.3	72.3	13.3
Niles-Benton Harbor MI MSA	3.7	2	8.3	0.0	50.0	0.0	50.0	11.2	15.3	46.5	27.0
Warren-Troy-Farmington Hills MI MSA	2.1	1	4.2	0.0	100.0	0.0	0.0	0.0	5.8	58.0	36.2
Michigan Non MSA	23.0	4	16.6	0.0	25.0	50.0	25.0	0.0	15.1	53.2	31.7

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Ann Arbor MI MSA	0	0				
Battle Creek MI MSA	0	1	-1			
Grand Rapids MI MSA	1	0			1	
Jackson MI MSA	0	2	-1		-1	
Kalamazoo/Portage MI MSA	1	4	1	-1	-3	
Monroe MI MSA	0	1		-1		
Niles-Benton Harbor MI MSA	0	0				
Warren-Troy-Farmington Hills MI MSA	0	0				
Michigan Non MSA	0	4			-4	

Ann Arbor MI MSA

ONB's branch distribution and retail service performance is poor. The bank's delivery systems are accessible to limited portions of the bank's AA. The bank has five branches within the AA, with none in low- or moderate-income CTs. The percentage of the bank's branches in LMI geographies is significantly below the percentage of population living in those geographies.

ATM distribution throughout the AA is poor. The bank has five deposit-taking ATMs located in the AA, with none in low-income CTs, and none in moderate-income CTs. The percentage of ATMs in LMI CTs is below the level of population in the LMI areas.

The opening and closing of branches have not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the assessment period, the bank did not open or close any branches in the AA.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours of 9:00 a.m. to noon.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Grand Rapids MI MSA

ONB's branch distribution and retail service performance is poor. The bank's delivery systems are accessible to limited portions of the bank's AA. The bank has five branches within the AA, with none in low- or moderate-income CTs. The percentage of the bank's branches in LMI geographies is significantly below the percentage of population living in those geographies.

ATM distribution throughout the AA is poor. The bank has six deposit-taking ATMs located in the AA, with none in LMI CTs.

The opening and closing of branches have not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the assessment period, the bank opened one branch in a middle-income CT.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours of 9:00 a.m. to noon.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Kalamazoo-Portage MI MSA

ONB's branch distribution and retail service performance is excellent. The bank has four branches within the AA, with one in a low-income CT and one branch in a moderate-income CT. The percentage of the bank's branches in LMI CTs exceeds the percentage of population living in those CTs.

ATM distribution throughout the AA is excellent. The bank has five deposit-taking ATMs located in the AA, two located in a low-income CT, and one in a moderate-income CT. The percentage of ATMs in LMI CTs exceeds the level of population in the LMI areas.

The opening and closing of branches have not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the assessment period, the bank opened a branch in a low-income CT and closed three branches in middle-income CTs and one branch in a moderate-income CT due to branch consolidations.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours of 9:00 a.m. to noon.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Michigan Non-MSA.

ONB's branch distribution and retail service performance is excellent. The bank's branches are readily accessible to geographies and individuals of different income levels in significant portions of the AA, particularly LMI geographies and/or LMI individuals. There are no low-income CTs in the AA. The bank has four branches within the AA, with one branch located in a moderate-income CT. The percentage of the bank's branches in moderate-income CTs exceeds the percentage of population living in those CTs.

ATM distribution throughout the AA is excellent. The bank has four deposit-taking ATM located in the AA, with one located in a moderate-income CT. The percentage of ATMs in moderate-income CTs exceeds the level of population in the moderate-income areas.

The opening and closing of branches have not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the assessment period, the bank did not open any branches in the AA and closed five middle-income branches due to branch consolidations.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours of 9:00 a.m. to noon.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

Ann Arbor MSA

ONB provides a significant level of CD services in the Ann Arbor MSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

ONB employees from various lines of business provided technical assistance to 54 different CD organizations totaling 2,203 hours during the evaluation period. ONB staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development. From 2016-2018, ONB associates provided approximately 72 hours of financial education training impacting 259 LMI participants.

Examples of some of these services include:

Family Learning Institute (FLI) - An associate provided 234 hours of volunteer Board service to FLI. FLI was created in response to the 1998 Michigan Educational Assessment Program (MEAP) statewide, standardized test. Thirty-five percent of 4th graders scored below grade level in reading; among African Americans, this number rose to seventy-one percent. The Family Learning Institute's core program provides free, one-on-one literacy and math tutoring to Washtenaw County 2nd-5th grade students from economically disadvantaged households. Sessions take place after school and away from school to provide a safe, private environment where children can learn. This addresses LMI educational needs.

Safehouse Center - An associate provided 178 hours of volunteer Board service to the Safehouse Center which meets affordable housing and domestic violence assistance needs. The Center's mission is to provide safety, support, advocacy and resources for survivors of sexual assault and domestic violence and their children.

Habitat of Huron Valley - Several associates volunteered for Habitat in the AA. Collectively, they have served 91 hours during the exam period with service activities including Board membership, assistance with strategic planning, Treasurer duties, and fundraising.

Grand Rapids MSA

ONB provides an adequate level of CD services in the Grand Rapids MSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

ONB employees from various lines of business provided technical assistance to 34 different CD organizations totaling 774 hours during the evaluation period. ONB staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development. From 2016-2018, ONB associates provided 17 hours of financial education training impacting 172 LMI participants. Organizations served include the West Michigan Center for Refugees, Good Samaritan Ministries, 70x7 Life Recovery, and Glenwood Elementary (80 percent free/reduced lunch).

Examples of some of these services include:

West Michigan CRA Association - An ONB associate joined the West Michigan CRA Association in 2018 and provides support, input, and expertise regarding how the Association can collaborate to benefit LMI individuals and communities in West Michigan.

Grand Rapids HQ - An associate provided 179 hours of volunteer Board service/technical assistance to Grand Rapids HQ, which provides services and shelter for runaway and homeless youth.

Head Start for Kent County - An associate provided 130 hours of Board service to Head Start four Kent County, which provides early childhood education services at no cost to income-eligible families that range from birth to age 5.

Kalamazoo-Portage MI MSA

ONB provides a significant level of CD services in the Kalamazoo-Portage, MI MSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

ONB employees from various lines of business provided technical assistance to 56 different CD organizations totaling 2,327 hours during the evaluation period. ONB staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development. From 2016-2018, ONB associates provided 37 hours of financial education training impacting 530 LMI participants. Most of the training took place in local schools including Parchment North Elementary (66 percent free/reduced lunch),

Comstock High School (54 percent free/reduced lunch) and Woodward Elementary (94 percent free/reduced lunch).

Examples of some of these services include:

NACD Small Business Workshop Series - Throughout 2016 and 2017, two ONB associates worked with the NACD – Northside Association for Community Development in Kalamazoo to develop a 9-week series of small business workshops targeted to minority and female-owned businesses on the Northside of Kalamazoo. They worked in conjunction with the SWMI CRA Association and a group of 5 other banks. The classes averaged approximately 25 attendees per session.

Southwest Michigan CRA Association - Since 2016, an ONB associated has served as the Vice President of the SWMI CRA Association. The SWMI CRA Association (a regional chapter of the Michigan CRA Association) is a group of 9 local banks with a mission to identify the credit needs of their communities and actively promote efforts to meet the credit needs of low- and moderate-income individuals and geographies.

Habitat for Humanity - Several associates volunteered for local Habitats in the AA. Collectively, they served 361 hours during the exam period with service activities including Board membership, fundraising, and technical assistance regarding IT needs.

Housing Resources Inc (HRI) - Associates volunteered for Housing Resources Inc. in the AA. The mission of HRI focuses on the assurance of affordable housing for socially or economically vulnerable persons in Kalamazoo County. Collectively, these associates served 171 hours during the exam period with service activities including Board membership, fundraising, and Finance Committee service.

Michigan Non-MSA

ONB provides a significant level of CD services in the MI Non-MSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

ONB employees from various lines of business provided technical assistance to 54 different CD organizations totaling 1,416 hours during the evaluation period. ONB staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development. From 2016-2018, ONB associates provided 18 hours of financial education training impacting 295 LMI participants. Organizations served were Madison Elementary School and Morenci Area High School. Both schools have student populations in which more than 51 percent of students are eligible for free/reduced lunch.

Examples of some of these services include:

Mentoring Support for Entrepreneurs - An ONB associate has provided hours of volunteer service for *Launch Lenawee*, which is an organization that has a mission centered around supporting and developing entrepreneurs and small businesses in Lenawee County, Michigan by providing access to business development services, mentorship, business loans, and networking opportunities. This individual serves on the Advisory Team and is a designated small business mentor for the organization. These activities help support an identified need in the community regarding the provision of supportive services for small business/entrepreneurs.

Habitat for Humanity - Several associates volunteered for local Habitats in the AA. Collectively, they have served 80 hours during the exam period with service activities including Board membership and fundraising.

Conclusions for Areas Receiving Limited-Scope Reviews

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

Based on limited-scope reviews, the bank's performance in the Monroe MSA, Niles-Benton Harbor MSA, and Warren-Troy-Farmington Hills MSA is consistent with the bank's overall High Satisfactory performance rating. Performance in the Battle Creek MSA and Jackson MSA is weaker than the state of Michigan rating. Weaker performance did not negatively impact conclusions about the bank's performance in the state.

State Rating

State of Minnesota

CRA rating for the State of Minnesota:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Adequate responsiveness to credit needs in its AAs, considering the number and amount of home mortgage loans and loans to small business in its AAs;
- Good geographic distribution of loans in its AAs;
- An adequate distribution, particularly in its AAs, of loans among individuals of different income levels and businesses of different sizes;
- A relatively high level of CD loans, which had a significantly positive impact on lending performance;
- An excellent level of qualified CD investments and grants and was responsive to the needs of their AAs;
- Services do not vary in any way that inconveniences portions of the bank's AA, particularly LMI geographies and individuals; and
- A relatively high level of CD services.

Description of Institution's Operations in Minnesota

ONB has three AAs within the state of Minnesota which are Mankato-North Mankato MSA, and Minneapolis-Saint Paul-Bloomington MSA. ONB has \$1.6 billion in deposits representing 13.2 percent of the total bank deposits. ONB operates seventeen branches within the state representing 9.5 percent of total number of bank offices. The bank made 5.0 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the state. The bank's primary loan products in the state of Minnesota are home mortgages and small business loans.

Based on FDIC Deposit Market Share data of June 30, 2018, ONB had a 1.10 percent deposit market share in the state and is ranked 9th out of 348 banks doing business in the state. The deposits accounted for 13.2 percent of the bank's total deposits. Primary competitors include US Bank, National Association ranked first in deposits with a market share of 31.4 percent, Wells Fargo Bank, National Association ranked second in

deposits with a market share of 31.3 percent, Bremer Bank, National Association ranked third in deposits with a market share of 3.5 percent, TCF National Bank ranked fourth in deposits with a market share of 3.0 percent, and Bank of America, National Association ranked fifth with a market share of 1.8 percent.

Scope of Evaluation in Minnesota

For the state of Minnesota, the Minneapolis-St. Paul-Bloomington MSA received a full scope review. The AA represents 94.4 percent of bank branches, 93.4 percent of mortgage originations, 92.9 percent of CRA loan originations, and 97.3 percent of total bank deposits for the state.

In 2016 and 2017, the bank did not originate or purchase a sufficient volume of home mortgage loans, small loans to businesses, or farms during the analysis periods as the bank first entered this market in November 2017.

Minneapolis-St. Paul-Bloomington MN MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Minneapolis-St Paul-Bloomington MN MSA – 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	685	8.2	23.8	41.9	25.1	1.0
Population by Geography	2,856,399	7.0	21.1	42.5	29.1	0.4
Housing Units by Geography	1,170,896	6.5	21.9	43.6	27.7	0.4
Owner-Occupied Units by Geography	757,758	2.6	17.1	46.3	34.0	0.1
Occupied Rental Units by Geography	357,975	13.9	31.6	38.4	15.2	0.9
Vacant Units by Geography	55,163	11.4	24.8	40.8	22.1	0.9
Businesses by Geography	212,660	5.3	18.3	44.5	31.5	0.4
Farms by Geography	4,767	2.1	13.4	50.0	34.5	0.1
Family Distribution by Income Level	704,789	20.7	17.0	21.6	40.6	0.0
Household Distribution by Income Level	1,115,733	24.1	16.2	18.2	41.5	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$85,636				
2018 FFIEC AMFI		\$93,600				
			Median Gross Rent			\$967
			Families Below Poverty Level			7.3%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

According to FDIC Deposit Market Share data as of June 30, 2018, ONB had \$1.6 billion in deposits with a deposit market share of 0.93 percent. ONB ranked seventh in total deposits out of 108 banks in the AA.

The bank's AA has 685 CTs which are 56 low-income; 163 moderate-income; 287 middle-income, 172 upper-income, and 7 NA.

The ONB's AA of Minneapolis-St Paul-Bloomington MSA consists of the following counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, Sherburne, Washington, and Wright. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

Housing Characteristics

According to the 2010 U.S. Census, 64.7 percent of the total housing units in the AA were owner-occupied, and 30.5 percent were rental occupied units.

Additionally, 2.6 percent of all owner-occupied units and 13.9 percent of renter occupied units were in low-income CTs. Furthermore, 4.5 percent of all single family (1-4 unit) homes and 12.8 percent of multifamily (five plus unit) housing units were in low-income tracts.

Also, 17.1 percent of all owner-occupied units and 44.2 percent of renter occupied units were in moderate-income CTs. Furthermore, 18.4 percent of all single family (1-4 unit) homes and 31.4 percent of multifamily (five plus unit) housing units were in moderate-income tracts.

Vacant units in the AA were 8.3 and 5.4 percent for low- and moderate-income CTs, respectively. The median age of AA housing stock was 60 and 54 years for low- and moderate- income CTs, respectively.

Employment

According to the BLS, the unemployment rate for this AA was 3.9 percent for January 2016, but it dropped to 2.8 percent for December 2018. The national unemployment rate for the US was 4.9 percent for January 2016, and it dropped to 3.9 percent for December 2018. The AA 2018 rate is lower than the national unemployment rate.

Housing Affordability

Qualifying for a mortgage loan in the AA with an estimated payment of \$1,825, would be a challenge for low-income borrowers, based on the following analysis. The 2018 FFIEC AMFI in the AA is \$93,600. The median housing value in the AA is \$268,950 in January 2016 and \$339,950 and December 2018 reflecting a percent change of 26.4 from January 2016 to December 2018 according to Realtor.com data. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment,

homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$46,800 per year (or less than 50 percent of the 2018 FFIEC AMFI in the AA) could afford a \$217,949 mortgage with a payment of \$1,170 per month. A moderate-income borrower making \$74,880 per year (or less than 80 percent of the 2018 FFIEC AMFI in the AA) could afford a \$348,719 mortgage with a payment of \$1,872 per month.

Large Employers in the AA

AA large employers include the following: Allina Health System; Target Corp.; University of Minnesota; HealthPartners; Fairview Health Systems; Wells Fargo and Company; and United Health Group.

Community Contacts

The OCC conducted seven community contacts in the AA. The community contacts included one local Chamber of Commerce, three local Economic Development Offices, and three local Affordable Housing Offices, which reported the following identified needs within this community:

- Affordable Housing for LMI residents
- Small dollar business loans
- Agricultural and Commercial Lending programs
- Financial Literacy Programs that includes those with credit problems
- Consumer Loans
- USDA Grants programs

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

The bank's performance under the Lending Test in the state of Minnesota is rated High Satisfactory. The state rating is based primarily on performance in AAs receiving full-scope reviews.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Minneapolis-St. Paul-Bloomington MSA is good. We considered the factors discussed in describing the bank's operation in the state above.

Lending Activity

Based on a full-scope review, lending levels in the Minneapolis-St. Paul MSA reflect adequate responsiveness to AA credit needs, considering the number and amount of home mortgage, small business, and small farm loans in the AA. We considered the lending volume in the AA relative to its capacity based on deposits, competition, and market presence.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans*	% State Deposits
Mankato-North Mankato MN MSA	15	27	4	0	46	3.5%	2.7%
Minneapolis-St Paul MN MSA	370	816	15	7	1,208	93.2%	97.3%
*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans*	% State Deposits
Mankato-North Mankato MN MSA	\$2,349	\$4,980	\$142	\$0	\$7,471	2.2%	2.7%
Minneapolis-St Paul MN MSA	\$78,891	\$219,235	\$1,172	\$21,139	\$320,437	96.3%	97.3%
*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.							

Minneapolis-St. Paul-Bloomington MSA

According to 2018 peer mortgage data, ONB ranked in the top 12 percent of lenders, 75th out of 650 lenders, originating home mortgage loans in the AA. The bank's market share of 0.25 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest mortgage lenders have captured 35.2 percent of the market. The top lenders are US Bank National Association with a market share of 12.4 percent, Wells Fargo Bank, National Association with a market share of 11.1 percent, Bell Bank with a market share of 4.8 percent, JP Morgan Chase National Association with a market share of 3.9 percent and American Mortgage and Equity with a market share of 3.0 percent.

According to 2017 peer small business data, ONB ranked 32nd out of 146 lenders originating small business loans in the AA. The bank's market share of 0.20 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest small business lenders have captured 70.9 percent of the market. The top small business lenders are US Bank NA with a market share of 23.4 percent, American Express, FSB with a market share of 19.3 percent, Wells Fargo Bank, NA with a market

share of 15.2 percent, Capital One Bank (USA) NA with a market share of 6.9 percent and Chase Bank USA, NA with a market share of 6.1 percent.

Distribution of Loans by Income Level of the Geography

During the evaluation period, the overall geographic distribution of loans was good. The geographic distribution of home mortgage loans was good and small business was excellent.

Home Mortgage Loans

During the evaluation period, the geographic distribution of the bank's home mortgage lending was adequate.

Refer to Table O in the state of Minnesota 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.

Minneapolis-St. Paul-Bloomington MSA

The distribution of the bank's home mortgage lending in 2018 was adequate. The proportion of loans exceeded the percentage of owner-occupied housing units in low-income CTs and was below the percentage in moderate-income CTs. The proportion of loans was below the aggregate distribution in LMI CTs.

Small Loans to Businesses

The geographic distribution of the bank's originations and purchases of small loans to businesses was good.

Refer to Table Q in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Minneapolis-St Paul-Bloomington MSA

During the 2018 analysis period, the distribution of small loans to businesses in LMI CTs was good. The proportion of loans was below the percentage of businesses in low-income CTs and exceeded the percentage of businesses in moderate-income CTs. The proportion of small loans to businesses in low-income CTs was near to the aggregate distribution of loans in those CTs and exceeded the aggregate distribution of loans in moderate-income CTs.

Small Loans to Farms

Small loans to farms were not a primary loan product in the state. The bank did not originate or purchase a sufficient volume of small farm loans during each analysis period to enable a meaningful analysis of the bank's performance in the rating area

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed ONB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

During the evaluation period, the overall borrower distribution of loans was adequate. The borrower distribution of home mortgage loans was good and small business loans was poor.

Home Mortgage Loans

The distribution of the bank's home mortgage loans to LMI borrowers was good.

Refer to Table P in the State of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loans.

Minneapolis-St. Paul-Bloomington MSA

The distribution of the bank's home mortgage loans to LMI borrowers was good.

During the 2018 analysis period, the distribution of the bank's home mortgage lending in 2018 was good. The proportion of loans was well below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans was well below the aggregate distribution of loans to low-income families and was near to the aggregate distribution to moderate-income families.

Small Loans to Businesses

The borrower distribution of the bank's originations and purchases of small loans to businesses was poor.

Refer to Table R in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Minneapolis-St Paul-Bloomington MSA

During the 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was poor.

The proportion of loans was significantly below the percentage of small businesses and well below the aggregate distribution of loans to those businesses.

Community Development Lending

The bank has made a high level of CD loans, which had a significantly positive impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Minneapolis-St Paul-Bloomington MSA

ONB originated seven CD loans totaling \$21.1 million and representing 9.7 percent of allocated tier 1 capital. CD loans originated exhibited excellent responsiveness to the credit and community needs in the AA. Loans supported affordable housing, community services to LMI, and economic development.

Examples of CD loans originated during the evaluation period include:

- \$6 million to a corporation in three revolving line of credits for working capital needs, which supports affordable housing and community services targeted to LMI individuals, the homeless populations, and veterans.
- \$2 million refinance commercial real estate loan to a nonprofit organization, which supports community services that support and empower youth on their journeys from being homeless to self-reliance. Services include assistance with employment or educational goals, accessing mental and physical health resources, or finding supportive housing.
- \$12 million to a nonprofit in two loans for the purchase of real estate and a revolving line of credit to provide working capital, which promotes economic development by financing a small business and will create and retain jobs for LMI individuals. The nonprofit provides adoption services.

Product Innovation and Flexibility

The bank made no use of innovative and/or flexible lending practices in order to serve AA credit needs during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables O through T in the state of Minnesota section of appendix D for the facts and data that support these conclusions.

Based on a limited-scope review, the bank's performance in the Mankato-North Mankato MSA is weaker than the bank's overall High Satisfactory performance rating under the Lending Test in the state of Minnesota. The performance difference is due to the weaker level of borrower distribution in the AA. Weaker performance had a neutral impact on ratings.

INVESTMENT TEST

The bank's performance under the Investment Test in Minnesota is rated Outstanding. ONB made 180 investments, totaling \$33.4 million, in Minnesota. This represents 14.9 percent of allocated tier 1 capital in the state.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments* *	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Mankato-North Mankato MN MSA	0	0	5	40	5	2.8	40	0.1	0	0
Minneapolis-St Paul-Bloomington MN MSA	2	758	172	32,017	174	96.7	32,775	98.1	0	0
MN – Statewide	1	605	0	0	1	0.5	605	1.8	0	0

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

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Minneapolis-St Paul-Bloomington MSA is excellent.

The bank has a significant level of qualified investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits excellent responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$32.8 million, with current investments of \$31.8 million, prior period investments of \$757,804, and qualified grants of \$165,750. Investments benefiting the AA during the evaluation represented 15.0 percent of allocated tier 1 capital. CD investments are centered in a CRA qualified investment bond fund totaling \$15.5 million supporting affordable housing. ONB has 58 MBS totaling \$11.8 million supporting commercial mortgages for affordable rental housing to LMI individuals and families in the AA. ONB has another 18 MBS totaling \$4.5 million supporting residential mortgages to LMI borrowers for affordable housing in the AA.

In addition, we considered the ongoing impact of investments made prior to the current evaluation period within the AA. One municipal bond with a remaining balance of \$435,027 funded improvements to public schools in Minneapolis, MN, where more than 50 percent of students participate in free or reduced lunch programs. One municipal bond with a remaining balance of \$322,776 funded renovation of a recreation center in White Bear Lake, MN, which helped to revitalize and stabilize the community and provides reduced fees to LMI residents.

All grants made were to organizations supporting economic development and/or providing services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$62,500 to five community service organizations providing affordable housing assistance to LMI individuals and families in the AA.
- \$10,000 to a community development organization providing loans to small businesses in the AA.
- \$10,000 to a nonprofit bakery providing job training to low-income teens.

Statewide

In addition, we considered the ongoing impact of investments made prior to the current evaluation period that include benefit to the MN AAs. There was one equity investment, with a balance of \$604,955, in a company supporting economic development and job creation in MI through capital investment in small businesses made on a statewide basis.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Mankato-North Mankato, MN MSA is weaker than the bank's overall performance under the Investment Test in the full-scope area due to a lower level of CD investments.

SERVICE TEST

The bank's performance under the Service Test in Minnesota is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Minneapolis-St Paul-Bloomington, MN MSA is good.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Mankato-North Mankato MN MSA	2.7	1	5.9	0	100.0	0	0	0.0	22.6	71.6	5.8
Minneapolis-St Paul-Bloomington MN MSA	97.3	16	94.1	6.3	25.0	50.0	18.7	7.0	21.1	42.5	29.4

The bank's branches are reasonably accessible to portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has 17 branches within the AA, with one branch in a low-income CT, and five branches in moderate-income CTs. The percentage of the bank's branches in low-income geographies is near to the percentage of population living in low-income geographies. The percentage of the bank's branches in moderate-income geographies exceeds the percentage of population living in moderate-income geographies.

ATM distribution throughout the AA is adequate. The percentage of ATMs in LMI CTs is similar to the branch distribution.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Mankato-North Mankato MN MSA	0	0				
Minneapolis-St Paul-Bloomington MN MSA	0	0				

The opening and closing of branches have not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the assessment period, the bank did not close any branches. The Minneapolis-St Paul-

Bloomington, MN MSA was added in November 2017 due to ONB's acquisition of Anchor Bancorp, Inc.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI CTs and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours of 9:00 a.m. to noon.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

ONB provides a relatively low level of CD services in the Minneapolis MSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities and the bank's length of time in the area.

ONB employees from various lines of business provided technical assistance to ten different CD organizations totaling 170 hours during the evaluation period. ONB staff served on various boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

Examples of some of these services include:

BestPrep - ONB associates provided 15 hours of financial education training impacting 108 LMI participants. The organization served was BestPrep whose mission is to prepare students with business, career, and financial literacy skills through hands-on experiences that inspire success in work and life. 100 percent of the students come from LMI households.

East Side Neighborhood Services - An ONB associate serves on the Board for East Side Neighborhood Services. In 2018, he spent over 48 hours volunteering as a Board member providing technical assistance and expertise. This organization has a mission of building pathways toward equity by disrupting social and economic barriers by offering after-school programs for youth, employment training, domestic violence abuse prevention, and food programs.

Model Cities - An ONB associate taught financial education classes in partnership with Model Cities, which is an organization that has a mission of providing social and economic prosperity by providing access to opportunities that stabilize and develop

families and communities. Classes are conducted in low-income, majority-minority census tracts to increase accessibility for participants.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Mankato-North Mankato, MN MSA is stronger than the bank's overall High Satisfactory and is considered excellent due to the bank's branch distribution in the AA. The Mankato-North Mankato, MN MS was added in November 2017 with ONB's acquisition of Anchor Bancorp, Inc. The stronger performance did not have an impact on the bank's overall Service Test performance for the state.

State Rating

State of Wisconsin

CRA rating for the State of Wisconsin:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Adequate responsiveness to credit needs in its AAs, considering the number and amount of home mortgage loans and loans to small business in its AAs;
- Good geographic distribution of loans in its AAs;
- Excellent distribution, particularly in its AAs, of loans among individuals of different income levels and businesses including farms of different sizes;
- An adequate level of CD loans, which had a neutral impact on lending performance;
- A good level of qualified CD investments and grants;
- Services do not vary in any way that inconveniences portions of the bank's AA, particularly LMI geographies and individuals; and
- A relatively high level of CD services.

Description of Institution's Operations in Wisconsin

ONB has eight AAs within the state of Wisconsin, which are Appleton MSA, Fond du Lac MSA, Eau Claire MSA, Janesville Beloit MSA, Madison MSA, Milwaukee-Waukesha-West Allis MSA, Oshkosh-Neenah MSA, and Wisconsin Non-MSA. ONB has \$1.7 billion in deposits representing 13.1 percent of the total bank deposits. ONB operates twenty-nine branches within the state representing 20.6 percent of total number of bank offices. The bank made 15.0 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the state. The bank's primary loan products in the state of Wisconsin are home mortgages.

The Fond du Lac, WI MSA was added in May 2016 due to ONB's acquisition of Anchor BanCorp Wisconsin. The Fond Du Lac County banking center closed in November 2017, which resulted in ONB exiting the MSA. The Eau Claire, WI MSA was added in May 2016 due to ONB's acquisition of Anchor BanCorp Wisconsin. The Eau Claire branches were divested in October 2018, which resulted in ONB exiting the MSA.

Based on FDIC Deposit Market Share data of June 30, 2018, ONB had a 1.10 percent deposit market share in the state and is ranked 11th out of 236 banks doing business in the state. The deposits accounted for 13.1 percent of the bank's total deposits. Primary competitors include US Bank, National Association ranked first in deposits with a market share of 18.1 percent, BMO Harris Bank National Association ranked second in deposits with a market share of 13.3 percent, Associated Bank, National Association ranked third in deposits with a market share of 10.9 percent, JP Morgan Chase Bank, National Association ranked fourth with a market share of 6.6 percent and Wells Fargo Bank, National Association ranked fifth with a market share of 3.0 percent.

Scope of Evaluation in Wisconsin

For the state of Wisconsin, the Appleton MSA, Madison MSA, and Wisconsin Non-MSA received full scope reviews.

Appleton MSA: The AA represents 5.1 percent of total bank branches, 5.1 percent of mortgage originations, 7.6 percent of CRA loan originations, and 3.6 percent of total bank deposits.

Madison MSA: The AA represents 53.8 percent of total bank branches, 40.7 percent of mortgage originations, 30.7 percent of CRA loan originations, and 55.8 percent of total bank deposits.

Wisconsin Non-MSA: The AA represents 17.9 percent of total bank branches, 18.2 percent of mortgage originations, 4.5 percent of CRA loan originations, and 19.5 percent of total bank deposits.

During the evaluation period, the bank did not originate or purchase a sufficient volume of small loans to businesses or farms during any analysis period to perform a meaningful analysis within the rating area except for the Milwaukee-Waukesha-West Allis WI MSA. The Madison WI MSA had sufficient volume in 2017 and 2018.

Appleton WI MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Appleton WI MSA – 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	40	0.0	17.5	75.0	7.5	0.0
Population by Geography	180,430	0.0	14.2	79.3	6.5	0.0
Housing Units by Geography	74,583	0.0	14.8	79.4	5.9	0.0
Owner-Occupied Units by Geography	50,215	0.0	11.9	80.6	7.5	0.0
Occupied Rental Units by Geography	20,290	0.0	21.9	75.5	2.6	0.0
Vacant Units by Geography	4,078	0.0	14.4	83.3	2.3	0.0
Businesses by Geography	9,382	0.0	12.7	80.6	6.6	0.0
Farms by Geography	472	0.0	11.0	81.8	7.2	0.0
Family Distribution by Income Level	47,627	19.0	19.0	24.2	37.9	0.0
Household Distribution by Income Level	70,505	22.9	17.6	20.6	38.9	0.0
Median Family Income MSA - 11540 Appleton, WI MSA		\$73,709				
2018 FFIEC AMFI		\$77,900				
			Median Gross Rent			\$715
			Families Below Poverty Level			6.1%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Appleton MSA

The AA represents 5.1 percent of total bank branches, 5.1 percent of mortgage originations, 7.6 percent of CRA loan originations, and 3.6 percent total bank deposits of the state. This is a new AA of the bank, which resulted from branch acquisitions.

ONB's AA of Appleton MSA consists of one county of Outagamie. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The bank has two branches within the AA, with one branch in a moderate-income CT. There are no low-income CTs in the AA. The bank has two deposit-taking ATMs located in the AA, with one in a moderate-income CT.

The bank's AA has 40-CTs which are 0 low-income; 7 moderate-income; 30 middle-income; and 3 upper-income.

Housing Characteristics

According to the 2010 U.S. Census, 67.3 percent of the total housing units in the AA were owner-occupied, and 27.2 percent were rental occupied units.

The AA does not have any low-income CTs.

Also, 11.9 percent of all owner-occupied units and 21.9 percent of renter occupied units were in moderate-income CTs. Furthermore, 13.8 percent of all single family (1-4 unit) homes and 20.9 percent of multifamily (five plus unit) housing units were in moderate-income tracts.

Vacant units in the AA were zero and 5.3 percent for low and moderate-income CTs, respectively. The median age of AA housing stock was 0 and 55 years for low and moderate income CTs, respectively.

Employment

According to the BLS, the unemployment rate for this AA was 7.3 percent for January 2016, but it dropped to 3.0 percent for December 2018. The national unemployment rate for the US was 4.9 percent for January 2016, and it dropped to 3.9 percent for December 2018. The AA 2018 rate is lower than the national unemployment rate.

Housing Affordability

Qualifying for a mortgage loan in the AA with an estimated payment of \$1,128, would be a challenge for low-income borrowers, based on the following analysis. The 2018 FFIEC AMFI in the AA is \$77,900. The median housing value in the AA is \$163,950 in January 2016 and \$210,050 in December 2018 reflecting a percent change of 28.1 from January 2016 to December 2018 according to Realtor.com data. Assuming a 30-year mortgage with a five percent interest rate, not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$38,950 per year (or less than 50 percent of the 2018 FFIEC AMFI in the AA) could afford a \$181,392 mortgage with a payment of \$974 per month. A moderate-income borrower making \$62,320 per year (or less than 80 percent of the 2018 FFIEC AMFI in the AA) could afford a \$290,227 mortgage with a payment of \$1,558 per month.

Large Employers in the AA

AA large employers are as follows: ThedaCare Inc.; Affinity Health System; Kimberly-Clark; Thrivent Financial for Lutherans; Plexus Products; Bemis Company; Faith Technologies, Inc.; and Pierce Manufacturing Co.

Community Contacts

The OCC conducted one community contact in the AA. The community contact was conducted with a local Affordable Housing Office, which reported the following identified needs within this community:

- Affordable Housing for LMI residents
- Financial Literacy programs

Madison WI MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Madison WI MSA – 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	133	3.0	20.3	50.4	21.8	4.5
Population by Geography	627,618	3.4	16.4	53.8	23.5	2.9
Housing Units by Geography	273,289	2.9	17.8	54.7	22.8	1.9
Owner-Occupied Units by Geography	157,819	0.6	13.7	60.0	25.6	0.0
Occupied Rental Units by Geography	100,418	6.6	23.2	46.0	19.5	4.7
Vacant Units by Geography	15,052	2.0	23.8	56.1	15.2	3.0
Businesses by Geography	42,588	2.2	17.5	50.3	28.2	1.8
Farms by Geography	2,513	0.3	15.1	62.4	22.0	0.2
Family Distribution by Income Level	154,158	19.8	17.7	23.4	39.0	0.0
Household Distribution by Income Level	258,237	23.2	16.9	18.9	41.1	0.0
Median Family Income MSA - 31540 Madison, WI MSA		\$81,321				
2018 FFIEC AMFI		\$88,600				
			Median Gross Rent			\$917
			Families Below Poverty Level			6.4%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Madison MSA

The AA represents 53.8 percent of total bank branches, 40.7 percent of mortgage originations, 30.7 percent of CRA loan originations, and 55.8 percent total bank deposits of the state. This is a new AA of the bank, which resulted from branch acquisitions.

The ONB's AA of Madison MSA consists of the following counties of Columbia, Dane, Green and Iowa. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The bank has 17 branches within the AA, with no branches in low-income CTs and two branches in moderate-income CTs. The bank has 11 deposit-taking ATMs located in the AA, with none in a low-income CT, and two in moderate-income CTs.

The bank's AA has 133-CTs which are 4 low-income; 27 moderate-income; 67 middle-income, 29 upper-income, and 6 NA.

Housing Characteristics

According to the 2010 U.S. Census, 57.7 percent of the total housing units in the AA were owner-occupied, and 36.7 percent were rental occupied units.

Additionally, 1.0 percent of all owner-occupied units and 6.6 percent of renter occupied units were in low-income CTs. Furthermore, 1.7 percent of all single family (1-4 unit) homes and 6.8 percent of multifamily (five plus unit) housing units were in low-income tracts.

Also, 13.7 percent of all owner-occupied units and 23.2 percent of renter occupied units were in moderate-income CTs. Furthermore, 15.8 percent of all single family (1-4 unit) homes and 22.3 percent of multifamily (five plus unit) housing units were in moderate-income tracts.

Vacant units in the AA were 3.8 and 7.4 percent for low and moderate-income CTs, respectively. The median age of AA housing stock was 42 and 51 years for low- and moderate- income CTs, respectively.

Employment

According to the BLS, the unemployment rate for this AA was 3.8 percent for January 2016, but it dropped to 2.1 percent for December 2018. The national unemployment rate for the US was 4.9 percent for January 2016, and it dropped to 3.9 percent for December 2018. The AA 2018 rate is lower than the national unemployment rate.

Housing Affordability

Qualifying for a mortgage loan in the AA with an estimated payment of \$1,651, would be a challenge for low-income borrowers, based on the following analysis. The 2018 FFIEC AMFI in the AA is \$88,600. The median housing value in the AA is \$249,950 in January 2016 and \$307,550 in December 2018 reflecting a percent change of 23.1 from January 2016 to December 2018 according to Realtor.com data. Assuming a 30-year mortgage with a five percent interest rate, not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income

borrower making \$44,300 per year (or less than 50 percent of the 2018 FFIEC AMFI in the AA) could afford a \$206,307 mortgage with a payment of \$1,108 per month. A moderate-income borrower making \$70,880 per year (or less than 80 percent of the 2018 FFIEC AMFI in the AA) could afford a \$330,091 mortgage with a payment of \$1,772 per month.

Large Employers in the AA

AA large employers include the following: University of Wisconsin Madison; Epic Systems; UW Hospital and Clinic Authority; American Family Insurance Co.; SSM Health; UnityPoint Health-Meriter and UW Medical Foundation; and WPS Health Solutions.

Community Contacts

The OCC conducted six community contacts in the AA. The community contacts were conducted at three local Affordable Housing and three Economic Development Offices, which reported the following identified needs within this community:

- Affordable Housing for LMI residents
- Financial Literacy programs
- First-Time Homebuyers programs

Wisconsin Non-MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Wisconsin Non-MSA – 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	61	0.0	1.6	78.7	18.0	1.6
Population by Geography	265,764	0.0	1.5	76.2	21.0	1.4
Housing Units by Geography	127,385	0.0	1.4	78.0	19.6	0.9
Owner-Occupied Units by Geography	72,607	0.0	0.8	76.2	22.8	0.1
Occupied Rental Units by Geography	30,568	0.0	3.8	79.7	13.4	3.1
Vacant Units by Geography	24,210	0.0	0.3	81.3	17.6	0.8
Businesses by Geography	14,336	0.0	1.0	79.0	19.5	0.5
Farms by Geography	1,610	0.0	0.2	84.0	15.8	0.0
Family Distribution by Income Level	66,019	16.3	18.2	22.3	43.2	0.0
Household Distribution by Income Level	103,175	22.2	15.8	18.4	43.5	0.0
Median Family Income Non- MSAs – WI		\$60,911				\$
2018 FFIEC AMFI		\$67,800				
			Median Gross Rent		\$721	
			Families Below Poverty Level		7.5%	
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Wisconsin Non-MSA

The AA represents 17.9 percent of total bank branches, 18.2 percent of mortgage originations, 4.5 percent of CRA loan originations, and 19.5 percent total bank deposits. This is a new AA of the bank, which resulted from branch acquisitions.

ONB's AA of Wisconsin Non-MSA consists of the following counties of Crawford, Grant, Walworth, Waushara, Green Lake, and Portage. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The bank has three branches within the AA. One branch is in a moderate-income CT and two are in middle-income CTs. There are no low-income CTs in the AA. The bank has one deposit-taking ATM located in the AA and it is in a moderate-income CT.

The bank's AA has 61 CTs which are 0 low-income; 1 moderate-income; 48 middle-income, 11 upper-income, and 1 NA.

Housing Characteristics

According to the 2010 U.S. Census, 57.0 percent of the total housing units in the AA were owner-occupied, and 24.0 percent were rental occupied units.

Additionally, zero percent of all owner-occupied units and zero percent of renter occupied units were in low-income CTs. Furthermore, zero percent of all single family (1-4 unit) homes and zero percent of multifamily (five plus unit) housing units were in low-income tracts.

Also, 1.0 percent of all owner-occupied units and 3.8 percent of renter occupied units were in moderate-income CTs. Furthermore, 1.3 percent of all single family (1-4 unit) homes and 3.2 percent of multifamily (five plus unit) housing units were in moderate-income tracts.

Vacant units in the AA were zero and 4.2 percent for low- and moderate-income CTs, respectively. The median age of AA housing stock was zero and 56 years for low and moderate income CTs, respectively.

Employment

According to the BLS, the unemployment rate for this AA was 5.2 percent for January 2016, but it dropped to 2.8 percent for December 2018. The national unemployment rate for the US was 4.9 percent for January 2016, and it dropped to 3.9 percent for December 2018. The AA 2018 rate is lower than the national unemployment rate.

Housing Affordability

Qualifying for a mortgage loan in the AA with an estimated payment of \$1,219 would be a challenge for low-income borrowers, based on the following analysis. The 2018 FFIEC AMFI in the AA is \$67,800. The median housing value in the AA is \$191,000 in January 2016 and \$ 227,000 in December 2018 reflecting a percent change of 18.8 percent from January 2016 to December 2018 according to Realtor.com data. Assuming a 30-year mortgage with a five percent interest rate, not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$33,900 per year (or less than 50 percent of the 2018 FFIEC AMFI in the AA) could afford a \$157,874 mortgage with a payment of \$848 per month. A moderate-income borrower making \$54,240 per year (or less than 80 percent of the 2018 FFIEC AMFI in the AA) could afford a \$252,598 mortgage with a payment of \$1,356 per month.

Large Employers in the AA

AA large employers are as follows: State of Wisconsin; Johnson Controls; Kohls; Tyco International Co.; Menards; Northwestern Mutual; Kohler Company; and Manpower Group.

Community Contacts

The OCC conducted five community contacts in the AA. The community contacts included two local Economic Development Offices, one local Affordable Housing Office, and two local Economic Development and Affordable Housing Offices, which reported the following identified needs within this community:

- Affordable Housing for LMI residents
- Financial Literacy programs
- Small dollar business loans
- Small business development loans

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

The bank's performance under the Lending Test in the state of Wisconsin is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Madison MSA and Wisconsin Non-MSA is good, and Appleton MSA is adequate. We considered the factors discussed in describing the bank's operation in the state above.

Lending Activity

Based on full-scope reviews, the bank's performance is adequate in the Appleton MSA, the Madison MSA, and the Wisconsin Non-MSA.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans*	% State Deposits
Appleton MSA	199	29	0	1	229	5.4%	3.6%
Eau Claire MSA	182	5	1	0	188	4.4%	4.1%
Fond du Lac MSA	25	1	0	0	26	0.6%	0.0%
Janesville-Beloit MSA	269	13	0	1	283	6.7%	3.8%
Madison MSA	1570	117	0	3	1,690	39.8%	55.9%
Milwaukee-Waukesha-West Allis MSA	607	187	0	17	811	19.1%	11.5%
Oshkosh-Neenah MSA	292	10	0	0	302	7.1%	7.1%
Wisconsin Non-MSA	700	16	1	3	720	16.9%	14.0%

**The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.*

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans*	% State Deposits
Appleton MSA	\$29,860	\$7,725	\$0	\$19,645	\$57,230	6.4%	3.6%
Eau Claire MSA	\$22,180	\$863	\$179	\$0	\$23,222	2.6%	4.1%
Fond du Lac MSA	\$4,036	\$100	\$0	\$0	\$4,136	0.5%	0.0%
Janesville-Beloit MSA	\$31,594	\$1,327	\$0	\$1,006	\$33,927	3.8%	3.8%
Madison MSA	\$280,797	\$28,800	\$0	\$18,360	\$327,957	36.7%	55.9%
Milwaukee-Waukesha-West Allis MSA	\$212,956	\$46,526	\$0	\$51,210	\$310,692	34.7%	11.5%
Oshkosh-Neenah MSA	\$32,771	\$1,479	\$0	\$0	\$34,250	3.8%	7.1%
Wisconsin Non-MSA	\$81,335	\$3,589	\$16	\$17,909	\$102,849	11.5%	14.0%

**The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.*

Appleton MSA

The bank's lending activity in the AA is poor.

According to 2018 peer mortgage data, ONB ranked in the top nine percent of lenders, 18th out of 218 lenders, originating home mortgage loans in the AA. The bank's market share of 1.3 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest mortgage lenders have captured 42.2 percent of the

market. The top lenders are Community First Credit Union with a market share of 15.8 percent, Fox Communities with a market share of 10.6 percent, Associated Bank NA with a market share of 6.0 percent, Capital Credit Union with a market share of 5.2 percent and Wells Fargo Bank, NA with a market share of 4.6 percent.

According to 2017 peer small business data, ONB ranked 25th out of 57 lenders originating small business loans in the AA. The bank's market share of 0.29 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest small business lenders have captured 64.8 percent of the market. The top five small business lenders are US Bank NA with a market share of 18.5 percent, Chase Bank USA, NA with a market share of 14.5 percent, American Express, FSB with a market share of 11.8 percent, Capital One Bank (USA) NA with a market share of 11.2 percent and Citibank, NA with a market share of 8.8 percent.

Madison MSA

The bank's lending activity in the AA is poor.

According to 2018 peer mortgage data, ONB ranked in the top two percent of lenders, seventh out of 401 lenders, originating home mortgage loans in the AA. The bank's market share of 2.4 percent is weaker than the bank's market share in deposits. The bank ranking for both is equal. The five largest mortgage lenders have captured 51.3 percent of the market. The top lenders are Summit Credit Union with a market share of 23.6 percent, University of Wisconsin Credit Union with a market share of 18.3 percent, Fairway Independence Mortgage Corporation with a market share of 3.9 percent, Wells Fargo Bank, National Association with a market share of 3.0 percent and US Bank National Association with a market share of 2.5 percent.

According to 2017 peer small business data, ONB ranked 23rd out of 95 lenders originating small business loans in the AA. The bank's market share of 0.56 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest small business lenders have captured 69.3 percent of the market. The top five small business lenders are US Bank NA with a market share of 20.1 percent, American Express, FSB with a market share of 16.9 percent, Chase Bank USA NA with a market share of 13.9 percent, Capital One Bank (USA) NA with a market share of 10.8 percent and Citibank, NA with a market share of 7.6 percent.

Wisconsin Non-MSA

The bank's lending activity in the AA is poor.

According to 2018 peer mortgage data, ONB ranked in the top two percent of lenders, fifth out of 413 lenders, originating home mortgage loans in the AA. The bank's market share of 3.4 percent is weaker than the bank's deposit market. The bank's rank in loans is stronger than the bank's rank in deposits. The remaining four largest mortgage lenders have captured 17.4 percent of the market. The four largest lenders are

Associated Bank, National Association with a market share of 5.1 percent, US Bank National Association with a market share of 4.3 percent, BMO Harris Bank National Association with a market share of 4.2 percent and Wells Fargo, National Association with a market share of 3.8 percent.

According to 2017 peer small business data, ONB ranked 37th out of 85 lenders originating small business loans in the AA. The bank's market share of 0.17 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest small business lenders have captured 62.5 percent of the market. The top five small business lenders are US Bank, NA with a market share of 21.4 percent, Capital One Bank, NA with a market share of 11.7 percent, American Express, FSB with a market share of 11.4 percent, Chase Bank USA, NA with a market share of 10.8 percent, and Citibank, NA with a market share of 7.2 percent.

Distribution of Loans by Income Level of the Geography

During the evaluation period, the overall geographic distribution of loans was good. The geographic distribution of home mortgage loans was good and small business was adequate.

Home Mortgage Loans

During the evaluation period, the distribution of the bank's home mortgage lending was good.

Refer to Table O in the state of Wisconsin 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.

Appleton MSA

The geographic distribution of home mortgage loans was adequate. Conclusions are based on performance in moderate income CTs as there are no low-income CTs in the AA.

During the 2018 analysis period, the distribution of the bank's home mortgage lending was adequate. The proportion of loans was below the percentage of owner-occupied housing units and the aggregate distribution of loans in moderate-income CTs. During the 2017 analysis period, the performance was poor. The proportion of loans was well below the percentage of owner-occupied housing units and the aggregate distribution in moderate-income CTs.

During the 2016 analysis period, the performance was good. The proportion of loans was below the percentage of owner-occupied housing units and was near to the aggregate distribution in moderate-income CTs.

Madison MSA

The geographic distribution of home mortgage loans was excellent.

The distribution of the bank's home mortgage lending in 2018 was excellent. The proportion of loans exceeded the percentage of owner-occupied housing units in low-income CTs and was near to the percentage in moderate-income CTs. The proportion of loans exceeded the aggregate distribution of owner-occupied housing units in low-income CTs and equal to the aggregate distribution of owner-occupied moderate-income CTs.

The distribution of the bank's home mortgage lending in 2017 was excellent. The proportion of loans exceeded the percentage of owner-occupied housing units in low-income CTs and the percentage in moderate-income CTs. The proportion of loans was equal to the aggregate distribution of owner-occupied housing units in low-income CTs and exceeded aggregate distribution of owner-occupied moderate-income CTs.

The distribution of the bank's home mortgage lending in 2016 was excellent. The proportion of loans near-to the percentage of owner-occupied housing units in low-income CTs and moderate-income CTs. The proportion of loans exceeded the aggregate distribution of owner-occupied housing units in LMI CTs.

Wisconsin Non-MSA

The geographic distribution of home mortgage loans was adequate. Conclusions are based on performance in moderate-income CTs as there are no low-income CTs in the AA.

The distribution of the bank's home mortgage lending in 2018 was excellent. The proportion of loans exceeded the percentage of owner-occupied housing units in moderate-income CTs. The proportion of loans exceeded the aggregate distribution in moderate-income CTs.

During the 2016 and 2017 analysis periods, the performance was significantly below demographic data resulting in very poor for both periods. The proportion of loans was well below the percentage of owner-occupied housing units and the aggregate distribution in moderate-income CTs.

Small Loans to Businesses

The geographic distribution of the bank's originations and purchases of small loans to businesses was adequate.

Refer to Table Q in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Appleton MSA

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

Madison MSA

Overall, the geographic distribution in the AA is adequate.

During the 2018 analysis period, the distribution of small loans to businesses in LMI CTs was poor. The proportion of loans was significantly below the percentage of businesses in low-income CTs and was below the percentage of businesses in moderate-income CTs. The proportion of small loans to businesses in low-income CTs was significantly below the aggregate distribution of loans in those CTs and was below the distribution of loans in moderate-income CTs.

During the 2017 analysis period, the performance was good. The proportion of loans was near to the percentage of businesses in LMI CTs. The proportion of small loans to businesses in low-income CTs exceeded the aggregate distribution of loans in those CTs and was near to the distribution of loans in moderate-income CTs.

In 2016, the bank did not originate or purchase a sufficient volume of small loans to businesses during the analysis period to perform a meaningful analysis.

Wisconsin Non-MSA

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

Small Loans to Farms

Small loans to farms were not a primary loan product in the state. The bank did not originate or purchase a sufficient volume of small farm loans during each analysis period to enable a meaningful analysis of the bank's performance in the rating area.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed ONB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

During the evaluation period, the overall borrower distribution of loans was excellent. The borrower distribution of home mortgage loans and small business was excellent.

Home Mortgage Loans

The distribution of the bank's home mortgage loans to LMI borrowers was excellent.

Refer to Table P in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of the bank's home mortgage loans.

Appleton MSA

The distribution of the bank's home mortgage loans to LMI borrowers was good.

During the 2018 analysis period, the distribution of the bank's home mortgage lending was good. The proportion of loans was below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans was significantly below the aggregate distribution of loans to low-income families and exceeded the aggregate distribution to moderate-income families.

During the 2017 analysis period, the performance was good. The proportion of loans was near to the percentage of LMI families. The proportion of loans exceeded the aggregate distribution of loans to low-income families and was well below the aggregate distribution to moderate-income families.

During the 2016 analysis period, the performance was excellent. The proportion of loans was below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans was near to the aggregate distribution of loans to low-income families and exceeded the aggregate distribution to moderate-income families.

Madison MSA

The distribution of the bank's home mortgage loans to LMI borrowers was excellent.

During the evaluation period, the distribution of the bank's home mortgage lending in was excellent and consistent. The proportion of loans was near to the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to LMI families.

Wisconsin Non-MSA

The distribution of the bank's home mortgage loans to LMI borrowers was excellent.

During the 2018 analysis period, the distribution of the bank's home mortgage lending was good. The proportion of loans was well below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans was below the aggregate distribution of loans to low-income families and exceeded the aggregate distribution to moderate-income families.

During the 2017 analysis period, the performance was excellent. The proportion of loans was below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to LMI families.

During the 2016 analysis period, the performance was excellent. The proportion of loans was below the percentage of low-income families and exceeded the percentage of moderate-income families. The proportion of loans exceeded the aggregate distribution of loans to LMI families.

Small Loans to Businesses

The borrower distribution of the bank's originations and purchases of small loans to businesses was good based on the conclusion of the Madison MSA.

Refer to Table R in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Appleton MSA

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

Madison MSA

The overall distribution of bank small loans to businesses by gross annual revenues was good.

During the 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was good. The proportion of loans was below the percentage of small businesses and exceeded the aggregate distribution of loans to those businesses.

During the 2017 analysis period, the performance was adequate. The proportion of loans was well below the percentage of small businesses and below the aggregate distribution of loans to those businesses.

In 2016, the bank did not originate or purchase a sufficient volume of small loans to businesses during the analysis period to perform a meaningful analysis.

Wisconsin Non-MSA

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

Small Loans to Farms

The level of small farm loans was below the 20 loans needed for review and analysis.

Community Development Lending

The bank has made an adequate level of CD loans, which had a neutral impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Appleton MSA

ONB originated one CD loan totaling \$19.6 million, which was 246.7 percent of allocated tier 1 capital. The CD loan originated exhibited adequate responsiveness to the credit and community needs in the AA. The loan was for the construction of a mixed-use apartment and retail building consisting of 110 apartments and 24 thousand square feet of commercial space, which supported revitalization/stabilization in the AA.

Madison MSA

ONB originated three CD loans totaling \$18.4 million and representing 14.8 percent of allocated tier 1 capital. CD loans originated exhibited good responsiveness to the credit and community needs in the AA. Loans supported affordable housing and revitalization/stabilization in the AA.

Examples of CD loans originated during the evaluation period include:

- \$1 million in two loan renewals for working capital to support operations for the CDFI dedicated to serving nonprofits. The CDFI targets projects that revitalize LMI neighborhoods by using its loan fund to help reduce social, economic and racial disparities for the unbanked.
- \$17.4 million construction loan to finance two apartment buildings totaling 148 units with retail space. The project helps to revitalize a depressed, blighted, and underutilized area, which is in a TIF district.

Wisconsin Non-MSA

ONB originated three CD loans totaling \$17.9 million and representing 41.1 percent of allocated tier 1 capital. CD loans originated exhibited adequate responsiveness to the credit and community needs in the AA. Loans supported affordable housing and economic development in the AA.

Examples of CD loans originated during the evaluation period include:

- \$13.9 million construction loan warehouse facility, which allows the company's continuous growth. The company will create jobs and supports activities that promote economic development by financing a small business.
- \$3 million loan to purchase a 56-unit senior multi-family property, which supports affordable housing for LMI people. The project is currently in the Section 42 low income housing tax credit program.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the "Other Performance" section under the Scope of the Evaluation section for additional details regarding other programs.

ONB works in conjunction with the WHEDA to offer affordable housing assistance programs to first time and other qualified homebuyers. These affordable loan products are offered under the agency's programs, which may include DPA, closing cost assistance, and tax credits. ONB leveraged these programs to originate 177 loans totaling \$23.2 million within the bank's AAs during the evaluation period. The following is a breakdown of the loans by AA:

- 50 loans totaling \$4.7 million in the Wisconsin Non-MSA
- 45 loans totaling \$8.3 million in the Madison MSA
- 37 loans totaling \$4.8 million in the Milwaukee-Waukesha-West Allis MSA
- 22 loans totaling \$2.5 million in the Oshkosh-Neenah MSA
- 18 loans totaling \$2.1 million in the Janesville Beloit MSA
- 5 loans totaling \$754,000 in the Appleton MSA

In addition, the bank leveraged the same programs to originate 17 loans totaling \$1.9 million to benefit portions of the state of Wisconsin outside of the bank's AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables O through T in the state of Wisconsin section of appendix D for the facts and data that support these conclusions.

Based on limited-scope reviews, the bank's performance in the Eau Claire MSA, Milwaukee-Waukesha-West Allis MSA, and Oshkosh-Neenah MSA is stronger than the bank's overall High Satisfactory performance rating under the Lending Test in the state of Wisconsin. The performance is stronger due to the excellent level of HMDA geographic distribution and borrower distribution to LMI CTs and borrowers. Stronger performance had a positive impact on the bank's conclusions in the state. Performance in the Janesville-Beloit MSA is consistent with the state of Wisconsin rating.

INVESTMENT TEST

The bank's performance under the Investment Test in Wisconsin is rated High Satisfactory. ONB made 253 investments, totaling \$26.8 million, in Wisconsin. This represents 12.0 percent of allocated tier 1 capital in the state.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Appleton MSA	0	0	10	1,692	10	3.95	1,692	6.32	0	0
Fond du Lac MSA	0	0	2	85	2	0.79	85	0.32	0	0
Eau Claire MSA	0	0	17	1,245	17	6.72	1,245	4.65	0	0
Janesville Beloit MSA	0	0	10	700	10	3.95	700	2.62	0	0
Madison MSA	0	0	126	16,082	126	49.80	16,082	60.12	0	0
Milwaukee-Waukesha-West Allis MSA	0	0	55	5,569	55	21.74	5,569	20.82	0	0
Oshkosh-Neenah MSA	0	0	16	684	16	6.32	684	2.56	0	0
WI non-MSA	0	0	17	694	17	6.72	694	2.59	0	0

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

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

Conclusions for Areas Receiving Full-Scope Reviews

The bank's overall performance in the full-scope AAs is High Satisfactory. Based on full-scope reviews, the bank's performance in the Appleton MSA and Madison MSA is excellent. The bank's performance in the WI Non MSA is adequate.

Appleton MSA

The bank has a significant level of qualified investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community

economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

ONB made \$1.7 million in qualified investments within the AA, representing 21.3 percent of allocated tier 1 capital. Investments consisted of eight current period investments and two grants. There were not any prior period investments in the AA.

Current period investments were centered in MBS, totaling \$1.5 million, and one investment in a CRA qualified bond fund of \$210,655. The two grants, totaling \$7,296, were to an organization focused on economic development.

Madison MSA

The institution has a significant level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits excellent responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

ONB made \$16.1 million in qualified investments within the AA, representing 12.9 percent of allocated tier 1 capital. These investments included \$15.7 million in current period investments and \$362,000 in grants and in-kind donations. There were no prior period investments in the AA.

Current period investments were made up of MBS, \$10.6 million, and CRA qualified bond fund investments, \$5.1 million. Grants supported affordable housing, economic development, and organizations offering services to LMI individuals and families.

Examples of grants in the AA include:

- \$12,500 to an organization providing food, job training, and financial education, among other services, to LMI individuals.
- \$25,000 to an organization making housing accessible to low-income families.
- \$94,000 in-kind donations of information technology equipment to an organization supporting non-profit organizations and individuals with barriers.

WI Non-MSA

The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

ONB made \$694,000 in qualified investments within the AA, representing 1.6 percent of tier 1 capital. These investments included five current period investments and twelve donations. There were no prior period investments in the AA.

Current period investments were centered in the CRA qualified bond fund and totaled \$677,410.

Examples of grants in the AA include:

- \$11,000 to an organization dedicated to connecting people with the resources they need to improve their lives.
- \$2,500 to a nonprofit helping to combat poverty.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Eau Claire MSA, Janesville-Beloit MSA, and Milwaukee-Waukesha-West Allis MSA is stronger than the bank's overall performance under the Investment Test in the full-scope areas. The level of investments in these AAs are considered excellent. The bank's performance under the Investment Test in the Oshkosh-Neenah MSA is consistent with the bank's overall performance under the Investment Test in the full-scope areas. The bank's performance under the Investment Test in the Fond du Lac MSA is weaker than the bank's overall performance under the Investment Test in the full-scope areas and is considered adequate.

SERVICE TEST

The bank's performance under the Service Test in Wisconsin is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance is good overall with excellent performance in the Appleton WI MSA and Wisconsin Non-MSA and poor performance in the Madison WI MSA.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Appleton WI MSA	3.6	2	6.9	0.0	50.0	50.0	0.0	0.0	14.2	79.3	6.5
Fond du Lac WI MSA	0	0	0	0.0	0.0	0.0	0.0	3.6	5.7	82.0	8.6
Eau Claire WI MSA	4.1	0	0	0.0	0.0	0.0	0.0	0.0	18.0	70.9	12.5
Janesville Beloit WI MSA	3.8	1	3.4	0.0	100.0	0.0	0.0	1.7	27.6	42.8	27.9
Madison WI MSA	55.9	17	58.6	0.0	11.8	70.6	17.6	3.4	16.4	53.8	26.4
Milwaukee-Waukesha-West Allis WI MSA	5.9	4	13.8	0.0	25.0	25.0	50.0	19.4	17.3	29.7	33.6
Oshkosh-Neenah WI MSA	7.1	2	6.9	0.0	50.0	50.0	0.0	0.0	15.4	62.3	22.3
Wisconsin Non-MSA	19.6	3	10.4	0.0	33.3	66.7	0.0	0.0	14.2	79.3	6.5

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Appleton WI MSA	0	1			-1	
Fond du Lac WI MSA	0	3		-1	-2	
Eau Claire WI MSA	0	1			-1	
Janesville Beloit WI MSA	0	0				
Madison WI MSA	0	4		-1	-3	
Milwaukee-Waukesha-West Allis WI MSA	0	2			-1	-1
Oshkosh-Neenah WI MSA	0	0				
Wisconsin Non-MSA	0	6			-5	-1

Appleton WI MSA

The bank's branches are reasonably accessible to portions of the AA, particularly moderate-income geographies and/or moderate-income individuals. The bank has two branches within the AA, with one branch in a moderate-income CT. There are no low-income CTs in the AA. The percentage of the bank's branches in moderate-income CTs exceeds the percentage of population living in moderate-income CTs.

ATM distribution throughout the AA is excellent. The bank has two deposit-taking ATMs located in the AA, with one in a moderate-income CT. The percentage of ATMs in moderate-income CTs exceeds the level of population in the moderate-income areas.

The opening and closing of branches have not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and/or to moderate-income individuals. During the assessment period, the bank closed one branch in a middle-income CT.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours of 9:00 a.m. to noon.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Madison WI MSA

The bank's branches are accessible to portions of the AA, particularly moderate-income geographies and/or moderate-income individuals. The bank has 17 branches within the AA, with no branches in low-income CTs and two branches in moderate-income CTs. The percentage of the bank's branches in LMI CTs is below the percentage of population living in those CTs.

ATM distribution throughout the AA is adequate. The bank has 11 deposit-taking ATMs located in the AA, with none in a low-income CT and two in moderate-income CTs. The percentage of ATMs in moderate-income CTs exceeds the level of population in moderate-income CTs.

The opening and closing of branches have not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the assessment period, the bank acquired 17 branches due to ONB's acquisition of Anchor Bancorp Wisconsin. The bank divested four branches in the AA to Marine Credit Union in 2018, including one moderate-income branch and three middle-income branches.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours of 9:00 a.m. to noon.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Wisconsin Non-MSA

The bank's branches are accessible to portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has three branches within the AA including one branch in a moderate-income CT. The percentage of the bank's branches in moderate-income CTs significantly exceeds the percentage of population living in those CTs. There are no low-income CTs in the AA.

ATM distribution throughout the AA is excellent. The bank has one deposit-taking ATM located in the AA, and it is in a moderate-income CT. The percentage of ATMs in moderate-income CTs exceeds the level of population in the moderate-income areas.

The opening and closing of branches have not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and/or to moderate-income individuals. The bank acquired ten branches as part of the 2016 ONB acquisition of Anchor Bancorp Wisconsin, including one branch in a moderate-income CT. During the assessment period, the bank closed six branches, including five branches located in middle-income CTs and a branch located in an upper-income CT as part of the Marine Credit Union divestiture.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours of 9:00 a.m. to noon.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development ServicesAppleton MSA

ONB provides a low level of CD services in the Appleton MSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

ONB employees from various lines of business provided technical assistance to four different CD organizations totaling 20 hours during the evaluation period. ONB staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

Examples of some of these services include:

Asset Builders - An ONB associate provided financial education through participating in the Finance and Investment Challenge Bowl (FICB) geared toward LMI youth. Asset Builders is a non-profit organization that has been teaching financial capability and economic empowerment to low- and moderate-income youth and families since 1999.

Homeless Connections - An associate serves on the Board for Homeless Connections, which provides resources and support to assist individuals and families with promoting self-sufficiency and ending homelessness.

Madison MSA

ONB provides a significant level of CD services in the Madison MSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

ONB employees from various lines of business provided technical assistance to 78 different CD organizations totaling 1,016 hours during the evaluation period. ONB staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

From 2016-2018, ONB associates provided approximately 47 hours of financial education training impacting 397 LMI participants. A sample of organizations served are Habitat for Humanity, United Way of Dane County, Urban League of Greater Madison, and several schools serving LMI schools (more than 51 percent free/reduced lunch).

Examples of some of these services include:

Home Buyers Round Table - Three ONB associates provided 244 volunteer service hours to the Home Buyers Round Table of Dane County by serving on the Board, Committees, providing financial education and providing technical assistance and education regarding how to secure down payment assistance funds. The Home Buyer's Round Table of Dane County is a collaboration of housing industry representatives that promote homeownership through education and counseling to low- and moderate-income families.

Habitat for Humanity - Four ONB associates volunteered for Habitat of Dane County. Collectively, they served 42 hours with service activities including Board membership, Family Support Committee (including visits), fundraising, and assistance with strategic planning.

Down Payment Assistance Provisions for LMI Families - Between 2016-2018, a Mortgage Loan Officer helped clients access \$1.27 Million in down payment assistance.

In 2018 alone, she helped her clients access \$682,251 of down payment assistance by working with various community partners that offer funding.

Wisconsin Non-MSA

ONB provides an adequate level of CD services in the WI Non-MSA. CD services were effective and responsive in helping the bank address community needs, which supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

ONB employees from various lines of business provided technical assistance to 22 different CD organizations totaling 249 hours during the evaluation period. ONB staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

Examples of some of these services include:

Services for LMI Individuals and Families - ONB has an extensive partnership with CAP Services, which serves the AA. ONB associates spent over 70 hours volunteering by preparing free tax returns for LMI individuals through the Volunteer Income Tax Assistance (VITA) program that is offered by CAP services to LMI families. Additionally, ONB associates participated in financial education events and partnered with CAP Services to support computer training for small businesses.

United Way of Platteville (Grant County) - An associate served on the Board for the United Way of Platteville (Grant County) that primarily provides services to LMI individuals and families.

Economic Development - Three ONB associates support economic development initiatives led by the Platteville Regional Chamber of Commerce through Committee membership and fundraising. This Chamber has a focus on providing support to the agriculture sector as well as addressing regional workforce shortages. The group meets quarterly to discuss training, retaining, and recruiting a strong workforce for area businesses.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance is consistent with the bank's state of Wisconsin overall High Satisfactory performance under the Service Test. Performance in the Janesville Beloit, WI MSA and the Oshkosh-Neenah, WI MSA is stronger than the bank's state of Wisconsin High Satisfactory performance due to the branch distribution in LMI CTs. Performance in the Milwaukee-Waukesha-West Allis, WI MSA is weaker than the bank's overall performance in the state and is considered poor. Weaker performance is due to the bank's branch distribution in the AA. The weaker

performance did not have an impact on the bank's overall Service Test performance for the state.

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 MSAs and non-MSAs 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:	01/01/2016 to 12/31/2018	
Bank Products Reviewed:	Home mortgage, small business, small farm, community development loans, qualified investments, community development services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Old National Bank Foundation (ONBF)	Separate Entity	Community Development Investments
ONB Community Equity and Evansville Downtown Growth Fund LLC	Subsidiaries	Community Equity Investments
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Evansville IN-KY MMSA	Full-Scope	Counties Posey, Vanderburgh, and Henderson (KY)
Louisville-Jefferson KY-IN MMSA	Full-Scope	Counties Jefferson (KY) and Clark (IN)
Illinois:		
Danville MSA	Full-Scope	Vermilion County
Illinois Non-MSA	Limited-Scope	Clark County
Indiana:		
Bloomington MSA	Full-Scope	Monroe County
Columbus MSA	Limited-Scope	Bartholomew County
Elkhart-Goshen MSA	Limited-Scope	Elkhart County
Fort Wayne MSA	Limited-Scope	Allen County
Indianapolis-Carmel-Anderson MSA	Full-Scope	Counties: Boone, Hamilton, Hendricks, Johnson, Madison, Marion and Putnam
Lafayette-West Lafayette MSA	Limited-Scope	Tippecanoe County
Muncie MSA	Full-Scope	Delaware County
South Ben-Mishawaka IN-MI MSA	Limited-Scope	St. Joseph County
Terre Haute MSA	Limited-Scope	Counties Vermilion and Vigo
Indiana Non-MSA	Full-Scope	Counties: Daviess, Dubois, Fountain, Jackson, Jefferson, Jennings, Knox, Kosciusko, Lawrence, Martin, Orange, Parke, Perry, Randolph, Spencer, Gibson, and Warren
Kentucky:		
Owensboro MSA	Full-Scope	Daviess County
Kentucky Non-MSA	Limited-Scope	Counties Hopkins, Muhlenberg, and Union

Michigan:		
Ann Arbor MSA	Full-Scope	Washtenaw County
Battle Creek MSA	Limited-Scope	Calhoun County
Grand Rapids-Wyoming MSA	Full-Scope	County Kent
Jackson MSA	Limited-Scope	Jackson County
Kalamazoo-Portage MSA	Full-Scope	Counties Kalamazoo and Van Buren
Monroe MSA	Limited-Scope	Monroe County
Niles-Benton Harbor MSA	Limited-Scope	Berrien County
Detroit Warren-Livonia, MI MSA	Limited-Scope	Livingston County
Michigan Non-MSA	Full-Scope	Lenawee County
Wisconsin:		
Appleton MSA	Full-Scope	Outagamie County
Eau Claire MSA	Limited-Scope	County Eau Claire and Chippewa
Fond du Lac MSA	Limited-Scope	Fond du Lac County
Janesville-Beloit MSA	Limited-Scope	Rock County
Madison MSA	Full-Scope	Counties: Columbia, Dane, Green, and Iowa
Milwaukee-Waukesha-West Allis MSA	Limited-Scope	Counties Milwaukee and Waukesha
Oshkosh-Neenah MSA	Limited-Scope	Winnebago County
Wisconsin Non-MSA	Full-Scope	Counties: Crawford, Grant, Walworth, Waushara, Green Lake and Portage
Minnesota:		
Mankato-North Mankato MN MSA	Limited-Scope	Blue Earth County
Minneapolis-St Paul-Bloomington MN MSA	Full-Scope	Counties: Anoka, Dakota, Hennepin, Ramsey, Scott, and Washington,

Appendix B: Summary of MMSA and State Ratings

RATINGS Old National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Old National Bank	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
MMSA or State:				
Evansville IN-KY MMSA	Outstanding	Outstanding	Outstanding	Outstanding
Louisville KY-IN MMSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Illinois	High Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
Indiana	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Kentucky	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Michigan	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Minnesota	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Wisconsin	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in 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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): 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; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, 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, 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-Scope 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), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/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. The median is the point at which half of the families have income above, and half below, a range of incomes. 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, and half below, a range of incomes.

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.

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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 1 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.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, 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 the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography -**
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 aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower -**
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 MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography -**
The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were 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) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - 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. Because aggregate 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 T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – 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 in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - 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 households by income level in each MMSA/assessment area.

Evansville IN-KY MMSA**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Evansville IN-KY MMSA	679	83,858	100.0	9,864	5.7	4.1	4.0	13.6	14.0	13.7	48.2	40.1	45.6	32.4	41.8	36.6	0.1	0.0	0.1
Total	679	83,858	100.0	9,864	5.7	4.1	4.0	13.6	14.0	13.7	48.2	40.1	45.6	32.4	41.8	36.6	0.1	0.0	0.1

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Evansville IN-KY MMSA	549	73,046	100.0	10,271	5.7	4.4	3.5	13.6	12.0	13.9	48.2	42.8	45.7	32.4	40.4	36.6	0.1	0.4	0.2
Total	549	73,046	100.0	10,271	5.7	4.4	3.5	13.6	12.0	13.9	48.2	42.8	45.7	32.4	40.4	36.6	0.1	0.4	0.2

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Evansville IN-KY MMSA	583	82,902	100.0	11,441	4.3	3.4	1.9	18.0	11.5	15.4	40.6	34.3	36.9	37.1	50.8	45.8	0.0	0.0	0.0
Total	583	82,902	100.0	11,441	4.3	3.4	1.9	18.0	11.5	15.4	40.6	34.3	36.9	37.1	50.8	45.8	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Evansville IN-KY MMSA	679	83,858	100.0	9,864	21.3	10.8	8.6	17.6	18.4	20.9	20.6	16.3	19.6	40.4	43.9	30.0	0.0	10.6	21.0
Total	679	83,858	100.0	9,864	21.3	10.8	8.6	17.6	18.4	20.9	20.6	16.3	19.6	40.4	43.9	30.0	0.0	10.6	21.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Evansville IN-KY MMSA	549	73,046	100.0	10,271	21.3	10.2	9.3	17.6	21.3	21.5	20.6	20.4	20.6	40.4	34.4	28.0	0.0	13.7	20.5
Total	549	73,046	100.0	10,271	21.3	10.2	9.3	17.6	21.3	21.5	20.6	20.4	20.6	40.4	34.4	28.0	0.0	13.7	20.5

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Evansville IN-KY MMSA	583	82,902	100.0	11,441	21.4	8.9	8.2	17.2	17.5	20.2	21.6	20.1	20.0	39.7	41.0	31.7	0.0	12.5	19.8
Total	583	82,902	100.0	11,441	21.4	8.9	8.2	17.2	17.5	20.2	21.6	20.1	20.0	39.7	41.0	31.7	0.0	12.5	19.8

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2018

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Evansville IN-KY MMSA	489	98,365	100.0	4,217	8.8	10.4	8.3	21.0	20.0	22.0	39.9	36.6	37.7	26.1	27.4	28.0	4.2	5.5	3.9
Total	489	98,365	100.0	4,217	8.8	10.4	8.3	21.0	20.0	22.0	39.9	36.6	37.7	26.1	27.4	28.0	4.2	5.5	3.9

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Evansville IN-KY MMSA	503	88,137	100.0	4,217	8.7	8.2	8.3	20.8	25.2	22.0	40.2	35.0	37.7	26.2	24.1	28.0	4.1	7.6	3.9
Total	503	88,137	100.0	4,217	8.7	8.2	8.3	20.8	25.2	22.0	40.2	35.0	37.7	26.2	24.1	28.0	4.1	7.6	3.9

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Evansville IN-KY MMSA	457	84,576	100.0	3,853	7.4	8.5	6.9	24.1	24.1	23.4	38.6	36.3	36.7	29.9	31.1	33.1	0.0	0.0	0.0
Total	457	84,576	100.0	3,853	7.4	8.5	6.9	24.1	24.1	23.4	38.6	36.3	36.7	29.9	31.1	33.1	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Evansville IN-KY MMSA	489	98,365	100.0	4,217	77.1	36.6	44.4	7.8	55.0	15.1	8.4
Total	489	98,365	100.0	4,217	77.1	36.6	44.4	7.8	55.0	15.1	8.4

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Evansville IN-KY MMSA	503	88,137	100.0	4,217	77.6	38.4	44.4	7.8	51.5	14.6	10.1
Total	503	88,137	100.0	4,217	77.6	38.4	44.4	7.8	51.5	14.6	10.1

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Evansville IN-KY MMSA	457	84,576	100.0	3,853	77.5	42.5	41.8	7.8	46.8	14.7	10.7
Total	457	84,576	100.0	3,853	77.5	42.5	41.8	7.8	46.8	14.7	10.7

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2018

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Evansville IN-KY MMSA	19	2,613	100.0	314	2.9	0.0	0.3	8.8	0.0	3.5	59.2	78.9	76.4	28.4	21.1	19.7	0.7	0.0	0.0
Total	19	2,613	100.0	314	2.9	0.0	0.3	8.8	0.0	3.5	59.2	78.9	76.4	28.4	21.1	19.7	0.7	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Evansville IN-KY MMSA	23	4,256	100.0	314	2.2	0.0	0.3	9.0	0.0	3.5	59.6	69.6	76.4	28.6	30.4	19.7	0.6	0.0	0.0
Total	23	4,256	100.0	314	2.2	0.0	0.3	9.0	0.0	3.5	59.6	69.6	76.4	28.6	30.4	19.7	0.6	0.0	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2016

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Evansville IN-KY MMSA	17	1,521	100.0	221	0.8	0.0	0.9	10.0	0.0	4.5	49.1	64.7	61.1	40.1	35.3	33.5	0.0	0.0	0.0
Total	17	1,521	100.0	221	0.8	0.0	0.9	10.0	0.0	4.5	49.1	64.7	61.1	40.1	35.3	33.5	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Evansville IN-KY MMSA	19	2,613	100.0	314	97.2	78.9	57.0	1.1	5.3	1.6	15.8
Total	19	2,613	100.0	314	97.2	78.9	57.0	1.1	5.3	1.6	15.8

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Evansville IN-KY MMSA	23	4,256	100.0	314	97.6	65.2	57.0	1.1	21.7	1.3	13.0
Total	23	4,256	100.0	314	97.6	65.2	57.0	1.1	21.7	1.3	13.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Evansville IN-KY MMSA	17	1,521	100.0	221	97.4	76.5	68.3	1.0	11.8	1.5	11.8
Total	17	1,521	100.0	221	97.4	76.5	68.3	1.0	11.8	1.5	11.8

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Louisville KY-IN MMSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Louisville KY-IN MMSA	124	39,439	100.0	31,028	5.0	1.6	3.4	18.6	8.1	16.3	39.9	21.0	39.6	36.4	68.5	40.6	0.1	0.8	0.1
Total	124	39,439	100.0	31,028	5.0	1.6	3.4	18.6	8.1	16.3	39.9	21.0	39.6	36.4	68.5	40.6	0.1	0.8	0.1

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Louisville KY-IN MMSA	84	27,875	100.0	24,086	5.8	0.0	4.0	19.3	17.9	17.0	37.2	26.2	38.8	37.6	54.8	40.1	0.1	1.2	0.2
Total	84	27,875	100.0	24,086	5.8	0.0	4.0	19.3	17.9	17.0	37.2	26.2	38.8	37.6	54.8	40.1	0.1	1.2	0.2

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Louisville KY-IN MMSA	111	18,398	100.0	27,337	7.0	3.6	3.7	14.6	19.8	11.7	43.0	38.7	41.5	35.4	37.8	43.0	0.0	0.0	0.0
Total	111	18,398	100.0	27,337	7.0	3.6	3.7	14.6	19.8	11.7	43.0	38.7	41.5	35.4	37.8	43.0	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Louisville KY-IN MMSA	124	39,439	100.0	31,028	22.6	4.8	15.6	18.0	11.3	20.0	19.8	17.7	18.8	39.6	64.5	29.8	0.0	1.6	15.7
Total	124	39,439	100.0	31,028	22.6	4.8	15.6	18.0	11.3	20.0	19.8	17.7	18.8	39.6	64.5	29.8	0.0	1.6	15.7

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Louisville KY-IN MMSA	84	27,875	100.0	24,086	23.2	7.1	9.4	17.7	14.3	21.6	19.3	22.6	19.6	39.8	50.0	32.8	0.0	6.0	16.6
Total	84	27,875	100.0	24,086	23.2	7.1	9.4	17.7	14.3	21.6	19.3	22.6	19.6	39.8	50.0	32.8	0.0	6.0	16.6

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Louisville KY-IN MMSA	111	18,398	100.0	27,337	23.3	11.7	9.7	17.6	16.2	19.4	19.9	20.7	19.1	39.2	45.0	32.9	0.0	6.3	19.0
Total	111	18,398	100.0	27,337	23.3	11.7	9.7	17.6	16.2	19.4	19.9	20.7	19.1	39.2	45.0	32.9	0.0	6.3	19.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2018

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Louisville KY-IN MMSA	71	17,682	100.0	16,560	7.8	11.3	7.4	17.9	4.2	18.2	30.4	15.5	30.6	38.9	40.8	39.6	4.8	28.2	4.2
Total	71	17,682	100.0	16,560	7.8	11.3	7.4	17.9	4.2	18.2	30.4	15.5	30.6	38.9	40.8	39.6	4.8	28.2	4.2

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Louisville KY-IN MMSA	55	15,650	100.0	14,977	8.6	23.6	8.2	16.8	5.5	17.4	27.8	18.2	28.2	41.3	43.6	41.5	5.4	9.1	4.6
Total	55	15,650	100.0	14,977	8.6	23.6	8.2	16.8	5.5	17.4	27.8	18.2	28.2	41.3	43.6	41.5	5.4	9.1	4.6

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Louisville KY-IN MMSA	54	13,568	100.0	15,377	14.9	20.4	12.6	14.2	37.0	13.7	30.5	11.1	29.3	40.0	31.5	43.9	0.4	0.0	0.4
Total	54	13,568	100.0	15,377	14.9	20.4	12.6	14.2	37.0	13.7	30.5	11.1	29.3	40.0	31.5	43.9	0.4	0.0	0.4

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Louisville KY-IN MMSA	71	17,682	100.0	16,560	81.5	19.7	51.4	6.9	43.7	11.6	36.6
Total	71	17,682	100.0	16,560	81.5	19.7	51.4	6.9	43.7	11.6	36.6

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Louisville KY-IN MMSA	55	15,650	100.0	14,977	82.0	32.7	51.9	6.9	38.2	11.2	29.1
Total	55	15,650	100.0	14,977	82.0	32.7	51.9	6.9	38.2	11.2	29.1

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Louisville KY-IN MMSA	54	13,568	100.0	15,377	81.8	31.5	46.6	6.9	46.3	11.3	22.2
Total	54	13,568	100.0	15,377	81.8	31.5	46.6	6.9	46.3	11.3	22.2
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Louisville KY-IN MMSA	0	0	0.0	100	4.0	0.0	0.0	16.8	0.0	19.0	39.0	0.0	60.0	39.3	0.0	19.0	0.8	0.0	2.0
Total	0	0	0.0	100	4.0	0.0	0.0	16.8	0.0	19.0	39.0	0.0	60.0	39.3	0.0	19.0	0.8	0.0	2.0
<i>Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>																			

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Louisville KY-IN MMSA	1	335	100.0	81	4.1	0.0	0.0	17.1	0.0	23.5	37.6	100.0	54.3	40.3	0.0	19.8	1.0	0.0	2.5
Total	1	335	100.0	81	4.1	0.0	0.0	17.1	0.0	23.5	37.6	100.0	54.3	40.3	0.0	19.8	1.0	0.0	2.5

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2016

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Louisville KY-IN MMSA	1	20	100.0	62	5.3	0.0	0.0	17.1	100.0	45.2	38.6	0.0	32.3	39.0	0.0	22.6	0.0	0.0	0.0
Total	1	20	100.0	62	5.3	0.0	0.0	17.1	100.0	45.2	38.6	0.0	32.3	39.0	0.0	22.6	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Louisville KY-IN MMSA	0	0	0.0	100	96.4	0.0	47.0	2.2	0.0	1.5	0.0
Total	0	0	0.0	100	96.4	0.0	47.0	2.2	0.0	1.5	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Louisville KY-IN MMSA	1	335	100.0	81	96.6	0.0	46.9	2.1	100.0	1.3	0.0
Total	1	335	100.0	81	96.6	0.0	46.9	2.1	100.0	1.3	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Louisville KY-IN MMSA	1	20	100.0	62	96.7	100.0	25.8	2.1	0.0	1.2	0.0
Total	1	20	100.0	62	96.7	100.0	25.8	2.1	0.0	1.2	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

State of Illinois

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Danville MSA	26	1,189	100.0	1,197	2.8	0.0	1.4	11.4	0.0	4.6	49.6	61.5	51.5	36.2	38.5	42.4	0.0	0.0	0.0
Total	26	1,189	100.0	1,197	2.8	0.0	1.4	11.4	0.0	4.6	49.6	61.5	51.5	36.2	38.5	42.4	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Danville MSA	24	920	70.6	1,245	2.8	4.2	2.1	11.4	8.3	5.5	49.6	50.0	53.3	36.2	37.5	39.1	0.0	0.0	0.0
Illinois Non-MSA	10	829	29.4	205	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	34	1,749	100.0	1,450	2.3	2.9	1.8	9.2	5.9	4.8	59.0	64.7	59.9	29.5	26.5	33.6	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Danville MSA	39	1,895	81.3	1,291	2.5	0.0	1.0	22.6	20.5	15.6	52.3	43.6	51.3	22.5	35.9	32.1	0.0	0.0	0.0
IL Non-MSA	9	889	18.8	244	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	48	2,784	100.0	1,535	2.0	0.0	0.8	18.5	16.7	13.2	61.1	54.2	59.0	18.4	29.2	27.0	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Danville MSA	26	1,189	100.0	1,197	21.7	15.4	8.9	16.8	15.4	17.9	20.7	23.1	24.7	40.8	38.5	33.1	0.0	7.7	15.5
Total	26	1,189	100.0	1,197	21.7	15.4	8.9	16.8	15.4	17.9	20.7	23.1	24.7	40.8	38.5	33.1	0.0	7.7	15.5

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Danville MSA	24	920	70.6	1,245	21.7	16.7	6.0	16.8	20.8	17.6	20.7	16.7	25.5	40.8	45.8	35.3	0.0	0.0	15.7
Illinois Non-MSA	10	829	29.4	205	20.6	0.0	5.9	18.4	10.0	19.0	23.1	30.0	23.4	38.0	60.0	42.0	0.0	0.0	9.8
Total	34	1,749	100.0	1,450	21.5	11.8	6.0	17.1	17.6	17.8	21.2	20.6	25.2	40.3	50.0	36.2	0.0	0.0	14.8

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Danville MSA	39	1,895	81.3	1,291	21.1	10.3	8.6	17.7	25.6	22.4	21.0	28.2	22.2	40.2	30.8	33.0	0.0	5.1	13.9
Illinois Non-MSA	9	889	18.8	244	17.2	11.1	7.4	21.5	44.4	20.1	23.0	22.2	21.3	38.3	22.2	38.9	0.0	0.0	12.3
Total	48	2,784	100.0	1,535	20.4	10.4	8.4	18.4	29.2	22.0	21.4	27.1	22.0	39.8	29.2	33.9	0.0	4.2	13.6

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2018

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Danville MSA	8	1,489	100.0	608	3.9	12.5	1.6	22.2	37.5	16.9	42.8	37.5	45.4	31.1	12.5	36.0	0.0	0.0	0.0
Total	8	1,489	100.0	608	3.9	12.5	1.6	22.2	37.5	16.9	42.8	37.5	45.4	31.1	12.5	36.0	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Danville MSA	19	3,945	61.3	608	3.8	5.3	1.6	22.6	15.8	16.9	42.9	68.4	45.4	30.7	10.5	36.0	0.0	0.0	0.0
Illinois Non-MSA	12	2,356	38.7	142	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	31	6,301	100.0	750	3.1	3.2	1.3	18.5	9.7	13.7	53.3	80.6	55.7	25.1	6.5	29.2	0.0	0.0	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Danville MSA	23	2,715	63.9	692	3.4	4.3	2.3	32.8	65.2	30.6	43.5	13.0	45.2	20.3	17.4	21.8	0.0	0.0	0.0
Illinois Non-MSA	13	3,982	36.1	166	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	36	6,697	100.0	858	2.8	2.8	1.9	26.7	41.7	24.7	53.9	44.4	55.8	16.6	11.1	17.6	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Danville MSA	8	1,489	100.0	608	73.3	37.5	41.9	6.5	50.0	20.3	12.5
Total	8	1,489	100.0	608	73.3	37.5	41.9	6.5	50.0	20.3	12.5

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Danville MSA	19	3,945	61.3	608	74.9	21.1	41.9	6.2	78.9	18.9	0.0
Illinois Non-MSA	12	2,356	38.7	142	76.4	33.3	54.9	5.4	66.7	18.2	0.0
Total	31	6,301	100.0	750	75.2	25.8	44.4	6.0	74.2	18.7	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Danville MSA	23	2,715	63.9	692	75.5	39.1	43.9	6.0	52.2	18.5	8.7
Illinois Non-MSA	13	3,982	36.1	166	77.6	23.1	53.6	4.8	76.9	17.6	0.0
Total	36	6,697	100.0	858	75.9	33.3	45.8	5.7	61.1	18.4	5.6

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2018

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Danville MSA	1	45	100.0	162	0.0	0.0	0.0	3.0	0.0	0.6	44.1	100.0	37.0	52.9	0.0	62.3	0.0	0.0	0.0
Total	1	45	100.0	162	0.0	0.0	0.0	3.0	0.0	0.6	44.1	100.0	37.0	52.9	0.0	62.3	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Danville MSA	1	144	8.3	162	0.3	0.0	0.0	2.1	0.0	0.6	45.0	100.0	37.0	52.5	0.0	62.3	0.0	0.0	0.0
Illinois Non-MSA	11	1,210	91.7	82	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	12	1,354	100.0	244	0.2	0.0	0.0	1.5	0.0	0.4	61.5	100.0	58.2	36.8	0.0	41.4	0.0	0.0	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2016

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Danville MSA	3	42	17.6	137	0.0	0.0	0.0	7.9	0.0	2.2	76.6	100.0	78.8	15.5	0.0	19.0	0.0	0.0	0.0
Illinois Non-MSA	14	1,565	82.4	78	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	17	1,607	100.0	215	0.0	0.0	0.0	5.5	0.0	1.4	83.6	100.0	86.5	10.8	0.0	12.1	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Danville MSA	1	45	100.0	162	97.6	100.0	53.7	1.8	0.0	0.6	0.0
Total	1	45	100.0	162	97.6	100.0	53.7	1.8	0.0	0.6	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Danville MSA	1	144	8.3	162	98.4	100.0	53.7	1.6	0.0	0.0	0.0
Illinois Non-MSA	11	1,210	91.7	82	99.4	72.7	58.5	0.0	18.2	0.6	9.1
Total	12	1,354	100.0	244	98.7	75.0	55.3	1.1	16.7	0.2	8.3

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Danville MSA	3	42	17.6	137	98.3	100.0	61.3	1.7	0.0	0.0	0.0
Illinois Non-MSA	14	1,565	82.4	78	100.0	92.9	74.4	0.0	7.1	0.0	0.0
Total	17	1,607	100.0	215	98.8	94.1	66.0	1.2	5.9	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

State of Indiana

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Bloomington MSA	217	38,289	9.3	3,910	3.1	0.5	2.3	7.6	8.3	9.3	44.8	38.7	46.6	44.4	52.1	41.8	0.0	0.5	0.1
Columbus MSA	82	11,979	3.5	3,063	0.0	0.0	0.0	20.7	15.9	17.1	51.8	48.8	53.3	27.5	35.4	29.6	0.0	0.0	0.0
Elkhart-Goshen	41	4,406	1.8	6,604	0.4	0.0	0.2	12.3	7.3	10.3	63.7	65.9	65.4	23.7	26.8	24.0	0.0	0.0	0.0
Fort Wayne MSA	134	24,743	5.7	13,181	6.7	1.5	2.1	15.1	8.2	13.1	42.0	32.1	40.9	36.1	58.2	43.8	0.1	0.0	0.1
Indiana Non-MSA	584	62,667	24.9	12,488	0.0	0.0	0.0	7.6	4.6	7.3	71.8	67.8	70.4	20.7	27.6	22.4	0.0	0.0	0.0
Indianapolis MSA	703	102,107	30.0	69,023	6.8	3.4	4.4	18.4	11.9	15.5	35.4	34.4	34.4	39.4	50.2	45.7	0.1	0.0	0.0
Lafayette MSA	193	31,893	8.2	5,715	1.1	1.6	1.3	16.2	13.5	16.5	35.3	30.6	33.4	47.3	54.4	48.4	0.1	0.0	0.3
Muncie MSA	115	11,948	4.9	2,823	3.8	0.0	1.0	21.6	10.4	15.2	30.3	39.1	31.1	43.5	50.4	51.1	0.8	0.0	1.6
South Bend-Mishawaka MSA	102	16,794	4.4	7,444	4.9	2.0	3.5	15.0	4.9	10.2	44.4	36.3	48.1	35.7	56.9	38.2	0.0	0.0	0.0
Terre Haute MSA	170	14,887	7.3	2,606	3.9	4.7	2.6	14.9	7.1	12.5	42.1	35.9	43.1	39.0	52.4	41.8	0.0	0.0	0.0
Total	2,341	319,713	100.0	126,857	4.6	1.7	3.0	15.5	9.0	13.7	44.4	44.2	41.9	35.5	45.1	41.3	0.1	0.0	0.1

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Bloomington MSA	151	37,491	8.5	3,775	3.1	1.3	1.7	7.6	8.6	9.1	44.8	43.0	47.6	44.4	47.0	41.5	0.0	0.0	0.1
Columbus MSA	61	13,673	3.4	2,637	0.0	0.0	0.0	20.7	9.8	16.8	51.8	42.6	53.7	27.5	47.5	29.5	0.0	0.0	0.0
Elkhart-Goshen	33	5,665	1.9	5,606	0.4	0.0	0.1	12.3	15.2	9.8	63.7	57.6	64.3	23.7	27.3	25.7	0.0	0.0	0.0
Fort Wayne MSA	66	14,300	3.7	12,487	6.7	7.6	2.3	15.1	18.2	14.0	42.0	24.2	41.3	36.1	50.0	42.4	0.1	0.0	0.0
Indiana Non-MSA	548	53,035	30.8	12,160	0.0	0.0	0.0	7.4	6.6	7.4	73.6	70.1	73.2	19.0	23.4	19.3	0.0	0.0	0.0
Indianapolis-Carmel-Anderson MSA	443	70,852	24.9	64,472	6.8	3.2	3.8	18.4	13.8	15.7	35.4	41.5	34.8	39.4	41.5	45.7	0.1	0.0	0.0
Lafayette-West	135	17,871	7.6	5,033	1.1	3.0	1.6	16.2	14.1	15.7	35.3	37.0	34.5	47.3	45.2	47.9	0.1	0.7	0.4
Muncie MSA	105	9,683	5.9	2,445	3.8	1.9	1.7	21.6	16.2	13.2	30.3	24.8	30.1	43.5	56.2	53.7	0.8	1.0	1.4
South Bend-Mishawaka MSA	64	13,373	3.6	6,679	4.9	0.0	3.2	15.0	15.6	10.1	44.4	34.4	49.3	35.7	50.0	37.4	0.0	0.0	0.0
Terre Haute MSA	176	13,156	9.9	2,669	3.9	2.8	1.9	14.9	9.7	12.0	42.1	37.5	40.4	39.0	50.0	45.6	0.0	0.0	0.0
Total	1,782	249,099	100.0	117,963	4.5	1.8	2.7	15.4	11.0	13.8	45.0	48.1	42.5	35.0	38.9	41.0	0.1	0.1	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Bloomington MSA	175	28,545	8.9	3,992	2.5	4.6	2.2	11.9	10.9	10.8	51.8	47.4	48.2	33.9	37.1	38.8	0.0	0.0	0.0
Columbus MSA	88	17,030	4.5	2,958	0.0	0.0	0.0	9.6	3.4	8.7	71.1	61.4	67.6	19.3	35.2	23.8	0.0	0.0	0.0
Elkhart-Goshen	26	3,238	1.3	5,634	0.0	0.0	0.0	13.1	3.8	9.8	55.6	57.7	52.5	31.3	38.5	37.7	0.0	0.0	0.0
Fort Wayne MSA	96	28,689	4.9	13,502	5.5	2.1	1.5	21.9	10.4	14.9	37.3	26.0	37.0	35.3	61.5	46.7	0.0	0.0	0.0
IN Non-MSA	589	55,281	29.9	12,086	0.0	0.0	0.0	9.7	8.1	7.8	73.7	75.7	72.9	16.5	16.1	19.3	0.0	0.0	0.0
Indianapolis MSA	441	90,790	22.4	69,407	5.6	0.7	2.0	20.0	13.4	13.3	36.7	41.0	35.3	37.8	44.9	49.4	0.0	0.0	0.0
Lafayette MSA	159	28,331	8.1	5,484	0.9	1.9	1.7	23.6	14.5	19.4	51.1	50.9	54.2	24.4	32.7	24.7	0.0	0.0	0.0
Muncie MSA	134	11,257	6.8	2,589	1.3	0.7	0.5	27.0	17.2	12.9	38.2	33.6	42.7	33.4	48.5	44.0	0.0	0.0	0.0
South Bend-Mishawaka MSA	92	17,659	4.7	7,050	2.2	1.1	0.9	21.9	10.9	16.1	37.4	37.0	37.3	38.4	51.1	45.7	0.0	0.0	0.0
Terre Haute MSA	170	10,291	8.6	2,785	6.8	1.8	3.0	17.7	17.1	14.0	45.6	55.9	45.6	29.9	25.3	37.4	0.0	0.0	0.0
Total	1,970	291,111	100.0	125,487	3.6	1.1	1.5	18.2	11.4	13.0	45.7	53.8	42.4	32.5	33.8	43.1	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Bloomington MSA	217	38,289	9.3	3,910	22.2	9.2	8.7	15.8	15.2	20.2	19.5	18.4	21.9	42.5	51.6	36.2	0.0	5.5	13.0
Columbus MSA	82	11,979	3.5	3,063	19.2	12.2	9.1	19.2	25.6	19.9	21.7	18.3	23.4	39.9	40.2	32.9	0.0	3.7	14.8
Elkhart-Goshen MSA	41	4,406	1.8	6,604	19.0	0.0	6.7	18.1	12.2	20.7	23.4	24.4	24.9	39.5	58.5	33.1	0.0	4.9	14.5
Fort Wayne MSA	134	24,743	5.7	13,181	20.7	4.5	10.5	17.9	13.4	22.1	21.8	13.4	20.8	39.6	59.0	31.0	0.0	9.7	15.6
Indiana Non-MSA	584	62,667	24.9	12,488	17.3	9.6	8.3	18.2	21.2	21.1	22.8	23.1	22.9	41.6	40.1	31.4	0.0	6.0	16.3
Indianapolis MSA	703	102,107	30.0	69,023	22.3	8.8	10.3	17.3	18.8	20.3	19.2	21.2	20.2	41.2	47.7	34.3	0.0	3.6	15.0
Lafayette MSA	193	31,893	8.2	5,715	20.5	9.3	9.7	15.7	17.1	21.7	23.0	20.7	21.1	40.8	49.2	32.2	0.0	3.6	15.4
Muncie MSA	115	11,948	4.9	2,823	21.7	7.0	9.8	16.8	22.6	19.3	20.8	18.3	20.8	40.7	47.0	33.1	0.0	5.2	17.0
South Bend-Mishawaka MSA	102	16,794	4.4	7,444	22.1	6.9	9.8	16.7	16.7	21.0	20.1	15.7	22.1	41.2	58.8	33.5	0.0	2.0	13.6
Terre Haute MSA	170	14,887	7.3	2,606	21.3	7.1	10.1	18.6	18.2	19.4	20.1	17.6	20.5	40.1	49.4	34.5	0.0	7.6	15.5
Total	2,341	319,713	100.0	126,857	21.1	8.5	9.8	17.5	18.8	20.6	20.6	20.2	21.1	40.9	47.4	33.5	0.0	5.0	15.1

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "---" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Bloomington MSA	151	37,491	8.5	3,775	22.2	8.6	5.1	15.8	14.6	15.6	19.5	16.6	20.7	42.5	56.3	45.1	0.0	4.0	13.4
Columbus MSA	61	13,673	3.4	2,637	19.2	9.8	9.1	19.2	9.8	18.5	21.7	19.7	21.4	39.9	57.4	38.1	0.0	3.3	12.8
Elkhart-Goshen MSA	33	5,665	1.9	5,606	19.0	9.1	6.5	18.1	15.2	21.5	23.4	21.2	26.0	39.5	48.5	31.5	0.0	6.1	14.4
Fort Wayne MSA	66	14,300	3.7	12,487	20.7	10.6	10.8	17.9	13.6	21.7	21.8	10.6	21.4	39.6	51.5	29.4	0.0	13.6	16.6
Indiana Non-MSA	548	53,035	30.8	12,160	17.5	10.4	7.1	18.3	22.3	19.7	22.8	25.9	22.6	41.4	37.0	31.4	0.0	4.4	19.1
Indianapolis-Carmel-Anderson MSA	443	70,852	24.9	64,472	22.3	11.5	8.5	17.3	20.3	18.3	19.2	17.8	20.8	41.2	46.5	35.7	0.0	3.8	16.7
Lafayette-West-	135	17,871	7.6	5,033	20.5	9.6	8.7	15.7	14.1	19.8	23.0	18.5	21.2	40.8	49.6	33.3	0.0	8.1	16.9
Muncie MSA	105	9,683	5.9	2,445	21.7	10.5	6.7	16.8	18.1	17.9	20.8	20.0	20.8	40.7	42.9	34.7	0.0	8.6	19.8
South Bend-Mishawaka MSA	64	13,373	3.6	6,679	22.1	6.3	9.7	16.7	7.8	21.0	20.1	26.6	22.6	41.2	54.7	32.9	0.0	4.7	13.8
Terre Haute MSA	176	13,156	9.9	2,669	21.3	5.1	5.9	18.6	18.8	18.6	20.1	26.1	23.6	40.1	44.9	37.4	0.0	5.1	14.5
Total	1,782	249,099	100.0	117,963	21.0	9.8	8.4	17.5	18.5	19.1	20.6	21.4	21.5	40.9	45.2	34.5	0.0	5.2	16.5

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Bloomington MSA	175	28,545	8.9	3,992	20.7	9.1	7.6	16.5	20.6	17.6	20.4	14.9	19.7	42.4	50.3	40.1	0.0	5.1	15.1
Columbus MSA	88	17,030	4.5	2,958	18.7	5.7	8.8	19.3	26.1	20.5	23.5	19.3	19.7	38.6	44.3	37.0	0.0	4.5	14.1
Elkhart-Goshen MSA	26	3,238	1.3	5,634	17.8	11.5	4.7	19.2	7.7	17.5	22.8	30.8	24.3	40.2	42.3	38.1	0.0	7.7	15.4
Fort Wayne MSA	96	28,689	4.9	13,502	19.5	6.3	8.2	18.5	8.3	18.9	22.6	14.6	20.0	39.4	53.1	34.8	0.0	17.7	18.2
IN Non-MSA	589	55,281	29.9	12,086	17.6	10.5	7.2	19.2	23.6	20.4	23.6	25.8	22.3	39.7	37.4	32.2	0.0	2.7	17.9
Indianapolis MSA	441	90,790	22.4	69,407	21.5	6.1	6.9	17.2	21.1	17.0	20.3	19.7	18.8	41.0	46.5	39.9	0.0	6.6	17.4
Lafayette MSA	159	28,331	8.1	5,484	21.9	8.8	9.6	17.2	12.0	18.5	21.1	21.4	20.2	39.8	51.6	33.6	0.0	6.3	18.1
Muncie MSA	134	11,257	6.8	2,589	20.2	10.4	7.1	19.0	20.9	17.1	21.7	17.9	19.8	39.0	48.5	35.0	0.0	2.2	21.1
South Bend-Mishawaka MSA	92	17,659	4.7	7,050	20.4	4.3	6.5	18.1	10.9	17.5	20.9	15.2	21.5	40.7	56.5	38.9	0.0	13.0	15.5
Terre Haute MSA	170	10,291	8.6	2,785	22.1	5.3	6.8	18.6	22.9	17.1	18.7	24.1	22.9	40.5	42.4	38.0	0.0	5.3	15.3
Total	1,970	291,111	100.0	125,487	20.3	8.1	7.1	17.9	20.2	17.8	21.3	21.2	19.9	40.4	44.9	38.0	0.0	5.6	17.2

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2018

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Bloomington MSA	104	18,425	6.4	1,927	5.9	5.8	6.8	21.3	42.3	21.4	35.3	28.8	36.0	35.5	23.1	35.4	2.0	0.0	0.4
Columbus MSA	33	8,651	2.0	1,100	0.0	0.0	0.0	35.8	51.5	33.3	39.9	30.3	38.8	24.3	18.2	27.9	0.0	0.0	0.0
Elkhart-Goshen MSA	41	10,865	2.5	2,746	1.2	0.0	1.1	15.6	12.2	12.8	63.8	82.9	66.9	19.4	4.9	19.3	0.0	0.0	0.0
Fort Wayne MSA	318	37,627	19.6	5,808	7.3	5.0	7.1	20.4	41.8	20.3	35.2	10.4	35.3	31.8	38.4	32.5	5.3	4.4	4.8
Indiana Non-MSA	364	48,680	22.5	5,803	0.0	0.0	0.0	11.6	7.7	9.0	69.7	69.2	70.2	18.7	23.1	20.8	0.0	0.0	0.0
Indianapolis MSA	460	96,782	28.4	29,180	8.8	11.3	8.5	19.9	18.3	17.4	31.9	28.5	31.4	39.2	41.7	42.4	0.1	0.2	0.3
Lafayette MSA	79	12,654	4.9	1,839	4.9	12.7	5.1	31.6	35.4	33.6	26.3	13.9	25.0	32.9	38.0	34.1	4.3	0.0	2.2
Muncie MSA	62	8,420	3.8	1,201	5.4	4.8	4.0	29.5	16.1	30.8	28.4	35.5	27.5	32.0	41.9	35.5	4.7	1.6	2.2
South Bend-Mishawaka MSA	67	10,850	4.1	3,593	12.1	6.0	9.4	16.3	19.4	14.2	42.6	37.3	46.7	29.0	37.3	29.7	0.0	0.0	0.0
Terre Haute MSA	93	13,954	5.7	1,286	7.8	12.9	12.1	22.4	23.7	18.2	34.3	33.3	30.2	35.5	30.1	39.5	0.0	0.0	0.0
Total	1,621	266,908	100.0	54,483	7.0	6.4	6.8	19.7	23.7	17.7	38.9	35.7	38.7	33.5	33.3	36.0	1.0	1.0	0.8

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Bloomington MSA	104	16,994	7.1	1,927	5.8	3.8	6.8	20.9	16.3	21.4	35.5	59.6	36.0	35.9	20.2	35.4	1.9	0.0	0.4
Columbus MSA	26	5,644	1.8	1,100	0.0	0.0	0.0	35.6	46.2	33.3	40.3	26.9	38.8	24.1	26.9	27.9	0.0	0.0	0.0
Elkhart-Goshen MSA	40	11,356	2.7	2,746	1.2	0.0	1.1	15.5	7.5	12.8	63.9	85.0	66.9	19.4	7.5	19.3	0.0	0.0	0.0
Fort Wayne MSA	152	36,530	10.4	5,808	7.6	8.6	7.1	20.2	24.3	20.3	35.7	29.6	35.3	31.4	27.6	32.5	5.1	9.9	4.8
Indiana Non-MSA	375	50,021	25.6	6,232	0.0	0.0	0.0	11.3	7.7	8.7	71.5	68.0	72.0	17.3	24.3	19.4	0.0	0.0	0.0
Indianapolis-Carmel-Anderson MSA	447	94,642	30.5	29,180	8.9	13.6	8.5	19.9	18.3	17.4	32.1	28.0	31.4	39.0	39.6	42.4	0.1	0.4	0.3
Lafayette-West Lafayette MSA	81	13,442	5.5	1,839	4.6	4.9	5.1	31.7	50.6	33.6	26.9	11.1	25.0	32.6	33.3	34.1	4.2	0.0	2.2
Muncie MSA	54	6,205	3.7	1,201	5.5	3.7	4.0	29.2	25.9	30.8	28.6	27.8	27.5	32.4	40.7	35.5	4.4	1.9	2.2
South Bend-Mishawaka MSA	70	16,521	4.8	3,593	11.9	5.7	9.4	16.0	10.0	14.2	42.7	52.9	46.7	29.4	31.4	29.7	0.0	0.0	0.0
Terre Haute MSA	115	20,959	7.9	1,286	7.9	10.4	12.1	22.2	31.3	18.2	34.4	32.2	30.2	35.5	26.1	39.5	0.0	0.0	0.0
Total	1,464	272,314	100.0	54,912	6.9	6.8	6.7	19.4	19.0	17.6	39.7	42.8	39.2	33.0	30.2	35.7	0.9	1.2	0.8

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Bloomington MSA	107	25,465	7.5	1,776	7.7	4.7	6.8	13.2	16.8	12.1	50.2	45.8	48.5	28.8	32.7	32.6	0.0	0.0	0.0
Columbus MSA	23	4,666	1.6	1,130	0.0	0.0	0.0	26.7	30.4	23.9	55.9	65.2	59.1	17.4	4.3	17.0	0.0	0.0	0.0
Elkhart-Goshen MSA	52	16,156	3.6	2,862	0.0	0.0	0.0	17.1	15.4	13.8	54.8	65.4	55.6	28.0	19.2	30.6	0.0	0.0	0.0
Fort Wayne MSA	159	31,950	11.1	6,002	10.7	16.4	9.5	25.7	26.4	22.1	32.4	28.9	32.6	30.8	27.7	35.4	0.4	0.6	0.3
IN Non-MSA	353	40,851	24.7	5,689	0.0	0.0	0.0	13.8	13.0	10.8	69.0	72.2	71.4	17.2	14.7	17.9	0.0	0.0	0.0
Indianapolis MSA	417	84,737	29.2	31,032	5.6	5.8	5.1	20.6	22.5	17.1	36.4	33.1	34.6	37.4	38.6	43.2	0.0	0.0	0.0
Lafayette MSA	91	16,297	6.4	1,864	6.7	6.6	6.1	40.2	47.3	35.6	34.2	31.9	40.6	18.3	14.3	17.7	0.6	0.0	0.0
Muncie MSA	62	8,763	4.3	1,337	2.7	1.6	2.8	32.3	30.6	34.5	39.2	38.7	35.7	23.5	27.4	26.6	2.3	1.6	0.5
South Bend-Mishawaka MSA	66	14,800	4.6	4,137	8.3	6.1	5.9	24.9	21.2	21.6	34.6	39.4	34.7	32.2	33.3	37.7	0.0	0.0	0.0
Terre Haute MSA	100	16,778	7.0	1,305	20.6	25.0	22.6	14.7	16.0	13.9	40.6	43.0	36.6	24.1	16.0	27.0	0.0	0.0	0.0
Total	1,430	260,463	100.0	57,134	5.7	6.4	5.2	21.2	21.5	18.1	41.8	46.1	40.3	31.2	25.9	36.4	0.1	0.1	0.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bloomington MSA	104	18,425	6.4	1,927	81.8	38.5	41.0	5.6	51.0	12.6	10.6
Columbus MSA	33	8,651	2.0	1,100	75.6	39.4	42.6	7.9	57.6	16.5	3.0
Elkhart-Goshen MSA	41	10,865	2.5	2,746	77.5	41.5	38.2	9.7	56.1	12.8	2.4
Fort Wayne MSA	318	37,627	19.6	5,808	79.6	74.5	47.4	7.5	23.0	12.9	2.5
Indiana Non-MSA	364	48,680	22.5	5,803	78.9	61.8	46.8	6.1	29.7	15.0	8.5
Indianapolis MSA	460	96,782	28.4	29,180	81.8	36.7	45.5	6.5	48.3	11.7	15.0
Lafayette MSA	79	12,654	4.9	1,839	79.8	45.6	44.8	5.6	50.6	14.7	3.8
Muncie MSA	62	8,420	3.8	1,201	77.8	58.1	47.1	6.9	33.9	15.4	8.1
South Bend-Mishawaka MSA	67	10,850	4.1	3,593	79.0	38.8	46.0	6.8	58.2	14.2	3.0
Terre Haute MSA	93	13,954	5.7	1,286	74.7	51.6	43.1	7.6	43.0	17.6	5.4
Total	1,621	266,908	100.0	54,483	80.4	52.3	45.3	6.7	39.4	12.9	8.4

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bloomington MSA	104	16,994	7.1	1,927	82.1	40.4	41.0	5.6	52.9	12.3	6.7
Columbus MSA	26	5,644	1.8	1,100	76.6	38.5	42.6	7.6	57.7	15.8	3.8
Elkhart-Goshen MSA	40	11,356	2.7	2,746	78.2	40.0	38.2	9.5	60.0	12.3	0.0
Fort Wayne MSA	152	36,530	10.4	5,808	80.2	38.8	47.4	7.4	57.9	12.3	3.3
Indiana Non-MSA	375	50,021	25.6	6,232	79.8	53.1	46.3	5.8	36.3	14.4	10.7
Indianapolis-Carmel-Anderson MSA	447	94,642	30.5	29,180	81.9	39.2	45.5	6.5	45.2	11.5	15.7
Lafayette-West Lafayette MSA	81	13,442	5.5	1,839	80.2	54.3	44.8	5.5	38.3	14.2	7.4
Muncie MSA	54	6,205	3.7	1,201	78.8	55.6	47.1	6.5	31.5	14.7	13.0
South Bend-Mishawaka MSA	70	16,521	4.8	3,593	79.3	47.1	46.0	6.9	48.6	13.8	4.3
Terre Haute MSA	115	20,959	7.9	1,286	75.3	50.4	43.1	7.5	39.1	17.2	10.4
Total	1,464	272,314	100.0	54,912	80.7	45.5	45.2	6.7	44.2	12.6	10.3

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bloomington MSA	107	25,465	7.5	1,776	81.6	48.6	34.9	5.7	47.7	12.7	3.7
Columbus MSA	23	4,666	1.6	1,130	76.7	52.2	37.7	7.4	47.8	15.9	0.0
Elkhart-Goshen MSA	52	16,156	3.6	2,862	78.3	26.9	33.9	9.6	73.1	12.1	0.0
Fort Wayne MSA	159	31,950	11.1	6,002	79.9	43.4	40.6	7.5	54.1	12.6	2.5
IN Non-MSA	353	40,851	24.7	5,689	80.1	60.3	47.5	5.5	32.0	14.4	7.6
Indianapolis MSA	417	84,737	29.2	31,032	81.4	48.2	38.7	6.7	46.5	11.9	5.3
Lafayette MSA	91	16,297	6.4	1,864	80.0	57.1	40.9	5.5	39.6	14.5	3.3
Muncie MSA	62	8,763	4.3	1,337	79.1	66.1	39.9	6.3	32.3	14.6	1.6
South Bend-Mishawaka MSA	66	14,800	4.6	4,137	79.1	45.5	40.9	7.0	54.5	13.9	0.0
Terre Haute MSA	100	16,778	7.0	1,305	75.5	57.0	39.3	7.4	33.0	17.1	10.0
Total	1,430	260,463	100.0	57,134	80.4	51.8	39.7	6.8	43.2	12.9	5.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2018

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Bloomington MSA	3	706	1.0	38	1.8	0.0	0.0	5.9	0.0	2.6	52.9	66.7	86.8	39.4	33.3	10.5	0.0	0.0	0.0
Columbus MSA	2	191	0.7	52	0.0	0.0	0.0	18.7	0.0	15.4	68.7	100.0	67.3	12.6	0.0	17.3	0.0	0.0	0.0
Elkhart-Goshen MSA	0	0	0.0	73	0.0	0.0	0.0	5.6	0.0	2.7	64.8	0.0	65.8	29.6	0.0	31.5	0.0	0.0	0.0
Fort Wayne MSA	0	0	0.0	320	3.1	0.0	2.5	9.1	0.0	13.4	48.1	0.0	51.9	38.8	0.0	25.6	0.8	0.0	6.6
Indiana Non-MSA	281	40,027	91.5	1,553	0.0	0.0	0.0	2.9	2.1	1.4	70.1	81.5	72.6	27.0	16.4	26.0	0.0	0.0	0.0
Indianapolis MSA	8	1,321	2.6	385	4.4	0.0	2.1	13.4	37.5	4.7	47.4	50.0	74.3	34.7	12.5	19.0	0.1	0.0	0.0
Lafayette MSA	3	218	1.0	90	1.0	0.0	0.0	9.3	0.0	2.2	38.9	0.0	56.7	50.8	100.0	41.1	0.0	0.0	0.0
Muncie MSA	8	1,018	2.6	85	0.8	0.0	0.0	10.3	0.0	2.4	40.1	75.0	52.9	48.9	25.0	44.7	0.0	0.0	0.0
South Bend-Mishawaka MSA	0	0	0.0	97	3.3	0.0	1.0	6.8	0.0	3.1	42.2	0.0	33.0	47.7	0.0	62.9	0.0	0.0	0.0
Terre Haute MSA	2	380	0.7	144	2.0	0.0	0.0	6.8	0.0	2.1	41.8	50.0	35.4	49.3	50.0	62.5	0.0	0.0	0.0
Total	307	43,861	100.0	2,837	2.2	0.0	0.6	8.7	2.9	3.6	54.8	79.5	66.1	34.2	17.6	28.9	0.1	0.0	0.7

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Bloomington MSA	2	421	0.6	38	1.8	0.0	0.0	5.3	0.0	2.6	50.7	100.0	86.8	42.2	0.0	10.5	0.0	0.0	0.0
Columbus MSA	1	100	0.3	52	0.0	0.0	0.0	17.8	0.0	15.4	69.3	100.0	67.3	13.0	0.0	17.3	0.0	0.0	0.0
Elkhart-Goshen MSA	0	0	0.0	73	0.2	0.0	0.0	5.8	0.0	2.7	64.0	0.0	65.8	30.0	0.0	31.5	0.0	0.0	0.0
Fort Wayne MSA	0	0	0.0	320	3.3	0.0	2.5	8.2	0.0	13.4	49.0	0.0	51.9	38.8	0.0	25.6	0.8	0.0	6.6
Indiana Non-MSA	308	41,549	89.5	1,651	0.0	0.0	0.0	2.6	2.3	1.3	73.5	74.4	74.3	23.9	23.4	24.5	0.0	0.0	0.0
Indianapolis-Carmel-Anderson MSA	9	1,370	2.6	385	4.5	0.0	2.1	12.7	33.3	4.7	48.8	55.6	74.3	34.0	11.1	19.0	0.1	0.0	0.0
Lafayette-West Lafayette MSA	3	313	0.9	90	0.7	0.0	0.0	9.7	0.0	2.2	38.7	0.0	56.7	50.9	100.0	41.1	0.0	0.0	0.0
Muncie MSA	15	2,095	4.4	85	0.7	0.0	0.0	9.9	6.7	2.4	42.5	53.3	52.9	46.9	40.0	44.7	0.0	0.0	0.0
South Bend-Mishawaka MSA	0	0	0.0	97	3.0	0.0	1.0	6.5	0.0	3.1	40.3	0.0	33.0	50.2	0.0	62.9	0.0	0.0	0.0
Terre Haute MSA	6	720	1.7	144	2.0	0.0	0.0	5.6	0.0	2.1	43.7	66.7	35.4	48.7	33.3	62.5	0.0	0.0	0.0
Total	344	46,568	100.0	2,935	2.1	0.0	0.6	8.0	3.2	3.5	57.0	72.4	67.2	32.9	24.4	28.0	0.1	0.0	0.7

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2016

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Bloomington MSA	1	250	0.3	14	1.9	0.0	0.0	4.2	0.0	7.1	71.3	100.0	50.0	22.7	0.0	42.9	0.0	0.0	0.0
Columbus MSA	2	140	0.5	46	0.0	0.0	0.0	5.3	0.0	0.0	83.3	100.0	89.1	11.4	0.0	10.9	0.0	0.0	0.0
Elkhart-Goshen MSA	0	0	0.0	75	0.0	0.0	0.0	4.9	0.0	0.0	47.2	0.0	45.3	48.0	0.0	54.7	0.0	0.0	0.0
Fort Wayne MSA	1	100	0.3	110	3.0	0.0	0.0	12.3	0.0	1.8	45.4	100.0	53.6	39.4	0.0	44.5	0.0	0.0	0.0
IN Non-MSA	340	45,160	89.5	1,374	0.0	0.0	0.0	3.3	3.2	2.6	77.5	84.4	83.8	19.2	12.4	13.5	0.0	0.0	0.0
Indianapolis MSA	8	950	2.1	392	2.9	0.0	0.5	11.6	0.0	3.6	50.8	87.5	74.0	34.7	12.5	21.9	0.0	0.0	0.0
Lafayette MSA	5	1,009	1.3	91	0.5	0.0	0.0	10.8	0.0	2.2	75.2	80.0	90.1	13.6	20.0	7.7	0.0	0.0	0.0
Muncie MSA	11	1,869	2.9	82	1.1	0.0	0.0	9.5	0.0	1.2	52.5	45.5	65.9	36.9	54.5	32.9	0.0	0.0	0.0
South Bend-Mishawaka MSA	0	0	0.0	119	1.1	0.0	0.8	10.4	0.0	0.8	43.2	0.0	50.4	45.2	0.0	47.9	0.0	0.0	0.0
Terre Haute MSA	12	2,053	3.2	164	2.2	0.0	0.0	5.5	0.0	1.2	55.9	91.7	55.5	36.4	8.3	43.3	0.0	0.0	0.0
Total	380	51,531	100.0	2,467	1.5	0.0	0.1	8.1	2.9	2.4	60.5	83.7	75.8	29.9	13.4	21.7	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bloomington MSA	3	706	1.0	38	96.8	100.0	81.6	2.3	0.0	0.9	0.0
Columbus MSA	2	191	0.7	52	97.2	100.0	63.5	2.0	0.0	0.8	0.0
Elkhart-Goshen MSA	0	0	0.0	73	97.4	0.0	56.2	1.5	0.0	1.1	0.0
Fort Wayne MSA	0	0	0.0	320	95.7	0.0	54.1	2.4	0.0	1.9	0.0
Indiana Non-MSA	281	40,027	91.5	1,553	97.7	83.3	63.3	1.7	13.9	0.6	2.8
Indianapolis MSA	8	1,321	2.6	385	95.6	87.5	57.1	2.5	0.0	1.9	12.5
Lafayette MSA	3	218	1.0	90	96.2	100.0	41.1	1.9	0.0	1.9	0.0
Muncie MSA	8	1,018	2.6	85	94.7	100.0	63.5	3.8	0.0	1.5	0.0
South Bend-Mishawaka MSA	0	0	0.0	97	95.8	0.0	75.3	3.5	0.0	0.7	0.0
Terre Haute MSA	2	380	0.7	144	97.6	100.0	71.5	1.4	0.0	1.0	0.0
Total	307	43,861	100.0	2,837	96.5	84.4	61.6	2.2	12.7	1.3	2.9

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bloomington MSA	2	421	0.6	38	96.4	100.0	81.6	2.7	0.0	0.9	0.0
Columbus MSA	1	100	0.3	52	97.8	100.0	63.5	1.5	0.0	0.7	0.0
Elkhart-Goshen MSA	0	0	0.0	73	98.1	0.0	56.2	1.2	0.0	0.7	0.0
Fort Wayne MSA	0	0	0.0	320	96.4	0.0	54.1	2.0	0.0	1.7	0.0
Indiana Non-MSA	308	41,549	89.5	1,651	97.9	85.1	62.1	1.6	13.0	0.5	1.9
Indianapolis-Carmel-Anderson MSA	9	1,370	2.6	385	96.1	77.8	57.1	2.2	0.0	1.7	22.2
Lafayette-West-Lafayette MSA	3	313	0.9	90	96.9	100.0	41.1	1.5	0.0	1.5	0.0
Muncie MSA	15	2,095	4.4	85	94.9	80.0	63.5	3.7	13.3	1.5	6.7
South Bend-Mishawaka MSA	0	0	0.0	97	96.0	0.0	75.3	3.6	0.0	0.4	0.0
Terre Haute MSA	6	720	1.7	144	97.7	66.7	71.5	1.3	33.3	1.0	0.0
Total	344	46,568	100.0	2,935	96.9	84.6	61.0	2.0	12.8	1.1	2.6

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bloomington MSA	1	250	0.3	14	97.7	100.0	50.0	1.4	0.0	0.9	0.0
Columbus MSA	2	140	0.5	46	97.8	100.0	58.7	1.3	0.0	0.9	0.0
Elkhart-Goshen MSA	0	0	0.0	75	98.1	0.0	53.3	1.4	0.0	0.6	0.0
Fort Wayne MSA	1	100	0.3	110	96.4	100.0	64.5	2.1	0.0	1.4	0.0
IN Non-MSA	340	45,160	89.5	1,374	97.9	83.5	64.9	1.5	14.1	0.5	2.4
Indianapolis MSA	8	950	2.1	392	96.2	100.0	60.5	2.1	0.0	1.7	0.0
Lafayette MSA	5	1,009	1.3	91	97.4	60.0	37.4	1.4	40.0	1.2	0.0
Muncie MSA	11	1,869	2.9	82	95.1	90.9	59.8	3.4	9.1	1.5	0.0
South Bend-Mishawaka MSA	0	0	0.0	119	96.2	0.0	76.5	3.4	0.0	0.5	0.0
Terre Haute MSA	12	2,053	3.2	164	97.8	75.0	81.7	1.5	25.0	0.7	0.0
Total	380	51,531	100.0	2,467	97.0	83.7	64.1	1.9	14.2	1.1	2.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

State of Kentucky

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Kentucky Non-MSA	183	12,486	53.8	1,878	0.0	0.0	0.0	2.4	2.2	3.1	64.7	71.6	50.4	32.9	26.2	46.4	0.0	0.0	0.0
Owensboro MSA	157	18,169	46.2	2,844	1.8	1.9	1.2	18.1	15.9	17.8	50.9	51.6	51.2	29.2	30.6	29.9	0.0	0.0	0.0
Total	340	30,655	100.0	4,722	0.9	0.9	0.7	10.2	8.5	12.0	57.8	62.4	50.9	31.0	28.2	36.5	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "---" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Kentucky Non-MSA	162	10,098	52.9	1,715	0.0	0.0	0.0	2.4	3.1	4.0	64.7	66.7	54.3	32.9	30.2	41.7	0.0	0.0	0.0
Owensboro MSA	144	19,348	47.1	2,864	1.8	0.7	1.6	18.1	18.8	19.6	50.9	47.9	50.9	29.2	32.6	27.9	0.0	0.0	0.0
Total	306	29,446	100.0	4,579	0.9	0.3	1.0	10.2	10.5	13.8	57.8	57.8	52.2	31.0	31.4	33.1	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "---" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Kentucky Non-MSA	206	12,921	59.2	1,976	0.0	0.0	0.0	8.5	6.3	9.0	61.2	63.1	56.0	30.3	30.6	35.0	0.0	0.0	0.0
Owensboro MSA	142	18,710	40.8	3,147	2.6	0.7	2.3	8.2	7.0	7.9	65.3	61.3	62.9	23.9	31.0	26.9	0.0	0.0	0.0
Total	348	31,631	100.0	5,123	1.3	0.3	1.4	8.3	6.6	8.4	63.2	62.4	60.2	27.2	30.7	30.0	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Kentucky Non-MSA	183	12,486	53.8	1,878	19.0	7.1	3.8	14.2	18.6	15.3	19.9	19.1	21.7	47.0	50.8	42.0	0.0	4.4	17.1
Owensboro MSA	157	18,169	46.2	2,844	21.8	7.0	8.1	17.7	19.7	20.0	19.7	23.6	23.3	40.8	38.9	31.2	0.0	10.8	17.4
Total	340	30,655	100.0	4,722	20.4	7.1	6.4	16.0	19.1	18.1	19.8	21.2	22.7	43.8	45.3	35.5	0.0	7.4	17.3

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Kentucky Non-MSA	162	10,098	52.9	1,715	19.0	5.6	3.6	14.2	17.3	15.8	19.9	30.9	22.0	47.0	40.7	40.6	0.0	5.6	18.1
Owensboro MSA	144	19,348	47.1	2,864	21.8	2.8	6.4	17.7	16.0	16.4	19.7	21.5	21.9	40.8	46.5	35.8	0.0	13.2	19.6
Total	306	29,446	100.0	4,579	20.4	4.2	5.3	16.0	16.7	16.2	19.8	26.5	21.9	43.8	43.5	37.6	0.0	9.2	19.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Kentucky Non-MSA	206	12,921	59.2	1,976	17.7	5.3	4.8	16.4	13.1	14.2	20.6	20.9	21.6	45.3	56.3	40.9	0.0	4.4	18.5
Owensboro MSA	142	18,710	40.8	3,147	20.3	4.9	7.4	16.1	21.1	19.3	24.0	23.2	21.3	39.5	45.8	30.8	0.0	4.9	21.2
Total	348	31,631	100.0	5,123	19.0	5.2	6.4	16.3	16.4	17.3	22.3	21.8	21.4	42.5	52.0	34.7	0.0	4.6	20.2

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2018

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Kentucky Non-MSA	65	9,741	63.1	829	0.0	0.0	0.0	6.0	1.5	5.3	58.3	75.4	48.4	35.8	23.1	46.3	0.0	0.0	0.0
Owensboro MSA	38	6,819	36.9	1,501	3.2	0.0	2.4	31.3	44.7	28.4	40.1	21.1	42.1	25.4	34.2	27.0	0.0	0.0	0.0
Total	103	16,560	100.0	2,330	1.8	0.0	1.5	20.2	17.5	20.2	48.0	55.3	44.3	30.0	27.2	33.9	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Kentucky Non-MSA	74	10,949	58.7	829	0.0	0.0	0.0	6.0	1.4	5.3	59.0	66.2	48.4	35.0	32.4	46.3	0.0	0.0	0.0
Owensboro MSA	52	9,016	41.3	1,501	3.3	0.0	2.4	30.8	46.2	28.4	40.4	25.0	42.1	25.5	28.8	27.0	0.0	0.0	0.0
Total	126	19,965	100.0	2,330	1.8	0.0	1.5	19.6	19.8	20.2	48.8	49.2	44.3	29.8	31.0	33.9	0.0	0.0	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Kentucky Non-MSA	94	12,471	63.9	983	0.0	0.0	0.0	17.4	11.7	13.2	54.3	61.7	52.0	28.3	26.6	34.8	0.0	0.0	0.0
Owensboro MSA	53	9,896	36.1	1,654	11.6	7.5	9.9	10.9	9.4	11.7	54.1	60.4	55.6	23.5	22.6	22.9	0.0	0.0	0.0
Total	147	22,367	100.0	2,637	6.2	2.7	6.2	13.9	10.9	12.3	54.2	61.2	54.2	25.7	25.2	27.3	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Kentucky Non-MSA	65	9,741	63.1	829	77.2	60.0	45.7	5.6	29.2	17.2	10.8
Owensboro MSA	38	6,819	36.9	1,501	79.2	39.5	49.3	6.5	44.7	14.3	15.8
Total	103	16,560	100.0	2,330	78.3	52.4	48.0	6.1	35.0	15.6	12.6

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Kentucky Non-MSA	74	10,949	58.7	829	78.4	62.2	45.7	5.3	24.3	16.3	13.5
Owensboro MSA	52	9,016	41.3	1,501	79.1	46.2	49.3	6.7	34.6	14.2	19.2
Total	126	19,965	100.0	2,330	78.8	55.6	48.0	6.1	28.6	15.1	15.9

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Kentucky Non-MSA	94	12,471	63.9	983	78.8	51.1	42.6	5.1	33.0	16.0	16.0
Owensboro MSA	53	9,896	36.1	1,654	78.9	39.6	45.9	6.6	49.1	14.5	11.3
Total	147	22,367	100.0	2,637	78.9	46.9	44.7	5.9	38.8	15.2	14.3

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2018

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Kentucky Non-MSA	27	4,022	90.0	186	0.0	0.0	0.0	0.6	0.0	0.5	66.5	92.6	59.7	32.9	7.4	39.8	0.0	0.0	0.0
Owensboro MSA	3	168	10.0	230	0.0	0.0	0.0	10.8	0.0	2.2	50.0	33.3	54.3	39.2	66.7	43.5	0.0	0.0	0.0
Total	30	4,190	100.0	416	0.0	0.0	0.0	6.0	0.0	1.4	57.8	86.7	56.7	36.2	13.3	41.8	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Kentucky Non-MSA	28	2,967	90.3	186	0.0	0.0	0.0	0.6	0.0	0.5	65.8	92.9	59.7	33.6	7.1	39.8	0.0	0.0	0.0
Owensboro MSA	3	158	9.7	230	0.3	0.0	0.0	9.4	0.0	2.2	48.8	33.3	54.3	41.5	66.7	43.5	0.0	0.0	0.0
Total	31	3,125	100.0	416	0.1	0.0	0.0	5.2	0.0	1.4	56.9	87.1	56.7	37.7	12.9	41.8	0.0	0.0	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2016

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Kentucky Non-MSA	35	4,654	81.4	183	0.0	0.0	0.0	3.1	2.9	2.7	55.4	68.6	51.9	41.5	28.6	45.4	0.0	0.0	0.0
Owensboro MSA	8	1,190	18.6	238	1.1	0.0	0.4	3.0	0.0	0.4	71.2	75.0	87.4	24.7	25.0	11.8	0.0	0.0	0.0
Total	43	5,844	100.0	421	0.6	0.0	0.2	3.1	2.3	1.4	63.5	69.8	72.0	32.9	27.9	26.4	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Kentucky Non-MSA	27	4,022	90.0	186	97.1	70.4	57.0	1.3	29.6	1.6	0.0
Owensboro MSA	3	168	10.0	230	97.4	100.0	56.1	2.0	0.0	0.6	0.0
Total	30	4,190	100.0	416	97.2	73.3	56.5	1.7	26.7	1.1	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Kentucky Non-MSA	28	2,967	90.3	186	98.0	75.0	57.0	0.9	21.4	1.2	3.6
Owensboro MSA	3	158	9.7	230	98.7	100.0	56.1	1.1	0.0	0.3	0.0
Total	31	3,125	100.0	416	98.3	77.4	56.5	1.0	19.4	0.7	3.2

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Kentucky Non-MSA	35	4,654	81.4	183	98.6	71.4	59.0	0.6	25.7	0.9	2.9
Owensboro MSA	8	1,190	18.6	238	98.6	87.5	60.1	1.1	0.0	0.3	12.5
Total	43	5,844	100.0	421	98.6	74.4	59.6	0.8	20.9	0.6	4.7

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

State of Michigan

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Ann Arbor MSA	399	93,985	29.3	11,054	6.6	2.5	7.5	12.0	5.3	12.3	44.7	40.9	46.1	36.5	51.4	33.9	0.2	0.0	0.2
Battle Creek MSA	40	5,078	2.9	3,417	5.2	0.0	2.7	21.1	20.0	18.6	42.7	30.0	41.8	31.0	50.0	36.9	0.0	0.0	0.0
Grand Rapids MSA	355	72,012	26.0	23,815	3.1	2.8	3.5	16.9	12.4	18.4	45.3	35.8	43.6	34.8	49.0	34.5	0.0	0.0	0.0
Jackson MSA	47	5,031	3.4	4,820	5.7	0.0	3.8	15.6	8.5	15.2	53.7	59.6	53.5	25.0	31.9	27.4	0.0	0.0	0.0
Kalamazoo-Portage	179	26,906	13.1	10,349	3.7	1.7	2.6	14.2	10.1	12.9	56.1	40.2	55.5	26.0	48.0	29.0	0.1	0.0	0.1
Michigan Non-MSA	212	23,253	15.5	3,048	0.0	0.0	0.0	10.2	4.2	7.9	56.4	52.4	54.8	33.5	43.4	37.3	0.0	0.0	0.0
Monroe MSA	41	5,097	3.0	5,260	0.5	0.0	0.2	10.2	7.3	9.6	74.9	80.5	75.0	14.3	12.2	15.2	0.0	0.0	0.0
Niles-Benton Harbor MSA	18	3,439	1.3	4,747	5.7	0.0	1.6	13.7	11.1	13.0	49.5	50.0	52.4	31.1	38.9	32.9	0.0	0.0	0.0
Warren-Troy-Farmington Hills MSA	73	17,186	5.4	8,701	0.0	0.0	0.0	3.4	4.1	4.2	58.7	54.8	57.5	37.8	41.1	38.3	0.0	0.0	0.0
Total	1,364	251,985	100.0	75,211	3.5	1.7	3.0	13.5	8.2	13.5	51.8	43.6	51.0	31.1	46.5	32.4	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Ann Arbor MSA	345	111,205	28.1	11,346	6.6	9.0	7.0	12.0	9.3	13.1	44.7	33.3	45.4	36.5	47.8	34.1	0.2	0.6	0.4
Battle Creek MSA	29	2,301	2.4	3,581	5.2	0.0	2.2	21.1	34.5	19.4	42.7	31.0	39.2	31.0	34.5	39.2	0.0	0.0	0.0
Grand Rapids-	358	78,286	29.2	22,523	3.1	2.5	3.3	16.9	14.5	19.4	45.3	39.4	44.3	34.8	43.6	33.0	0.0	0.0	0.0
Jackson MSA	45	5,351	3.7	4,629	5.7	2.2	3.0	15.6	2.2	14.7	53.7	46.7	53.1	25.0	48.9	29.2	0.0	0.0	0.0
Kalamazoo-Portage	131	21,899	10.7	10,272	3.7	1.5	2.2	14.2	9.9	12.6	56.1	55.7	56.9	26.0	32.8	28.3	0.1	0.0	0.0
Michigan Non-MSA	188	20,609	15.3	2,906	0.0	0.0	0.0	10.2	10.6	7.2	56.4	51.1	54.1	33.5	38.3	38.8	0.0	0.0	0.0
Monroe MSA	44	5,792	3.6	5,042	0.5	0.0	0.2	10.2	0.0	9.4	74.9	97.7	74.9	14.3	2.3	15.5	0.0	0.0	0.0
Niles-Benton Harbor MSA	24	5,357	2.0	4,354	5.7	0.0	1.6	13.7	25.0	13.2	49.5	45.8	52.2	31.1	29.2	33.0	0.0	0.0	0.0
Warren-Troy-Farmington Hills MSA	63	17,802	5.1	8,752	0.0	0.0	0.0	3.4	12.7	3.9	58.7	66.7	57.7	37.8	20.6	38.5	0.0	0.0	0.0
Total	1,227	268,602	100.0	73,405	3.5	3.5	2.8	13.5	11.6	13.8	51.8	44.9	51.1	31.1	39.9	32.2	0.0	0.2	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Ann Arbor MSA	423	122,164	28.3	13,316	4.0	1.9	2.3	14.9	4.5	12.1	51.9	48.7	53.6	29.3	44.9	32.0	0.0	0.0	0.0
Battle Creek MSA	30	3,087	2.0	3,481	4.9	0.0	0.9	22.4	6.7	16.5	38.9	36.7	38.2	33.7	56.7	44.4	0.0	0.0	0.0
Grand Rapids-Wyoming MSA	478	117,457	31.9	26,026	3.5	3.3	2.8	16.7	6.5	15.7	45.6	33.9	43.2	34.2	56.3	38.3	0.0	0.0	0.0
Jackson MSA	72	11,992	4.8	4,815	6.4	1.4	2.8	10.0	9.7	7.9	54.7	51.4	56.8	28.9	37.5	32.5	0.0	0.0	0.0
Kalamazoo-Portage	130	33,431	8.7	10,735	3.6	2.3	1.3	13.5	5.4	10.6	56.2	46.2	54.5	26.7	46.2	33.7	0.0	0.0	0.0
Michigan Non-MSA	187	20,090	12.5	3,133	0.0	0.0	0.0	6.7	2.1	2.7	45.8	40.6	41.0	47.6	57.2	56.3	0.0	0.0	0.0
Monroe MSA	55	7,289	3.7	5,474	0.6	3.6	0.4	8.6	7.3	7.9	73.9	80.0	72.4	16.9	9.1	19.4	0.0	0.0	0.0
Niles-Benton Harbor MSA	26	3,766	1.7	4,613	4.1	0.0	0.9	11.7	15.4	8.9	48.0	34.6	48.3	36.2	50.0	41.9	0.0	0.0	0.0
Warren-Troy-Farmington Hills MSA	96	27,923	6.4	10,397	0.1	0.0	0.4	5.6	1.0	4.1	53.4	28.1	50.2	40.9	70.8	45.3	0.0	0.0	0.0
Total	1,497	347,199	100.0	81,990	3.2	2.0	1.8	13.3	5.3	11.2	51.5	42.2	50.0	32.1	50.5	37.1	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Ann Arbor MSA	399	93,985	29.3	11,054	22.7	4.8	9.0	17.0	12.0	20.2	19.6	19.0	22.6	40.7	61.7	37.6	0.0	2.5	10.5
Battle Creek MSA	40	5,078	2.9	3,417	21.7	5.0	7.5	17.8	2.5	19.2	19.6	32.5	23.1	40.9	45.0	37.5	0.0	15.0	12.6
Grand Rapids MSA	355	72,012	26.0	23,815	20.9	3.4	9.4	17.4	15.5	22.5	21.7	21.1	22.6	40.1	57.5	34.9	0.0	2.5	10.7
Jackson MSA	47	5,031	3.4	4,820	22.3	8.5	9.3	17.5	21.3	18.8	20.2	21.3	25.7	40.0	48.9	34.4	0.0	0.0	11.8
Kalamazoo-Portage MSA	179	26,906	13.1	10,349	21.4	8.4	11.3	17.3	17.3	20.9	20.7	16.2	21.5	40.7	50.8	36.1	0.0	7.3	10.3
Michigan Non-MSA	212	23,253	15.5	3,048	16.4	4.2	6.4	17.4	21.2	17.7	20.7	24.1	23.7	45.6	44.8	35.5	0.0	5.7	16.8
Monroe MSA	41	5,097	3.0	5,260	19.3	19.5	10.3	18.8	19.5	24.0	22.2	9.8	25.6	39.7	51.2	28.3	0.0	0.0	11.8
Niles-Benton Harbor MSA	18	3,439	1.3	4,747	22.6	5.6	7.0	17.0	16.7	16.4	19.4	0.0	20.8	40.9	72.2	46.6	0.0	5.6	9.2
Warren-Troy-Farmington Hills MSA	73	17,186	5.4	8,701	13.8	2.7	6.9	17.3	6.8	19.6	22.4	20.5	25.6	46.5	67.1	38.4	0.0	2.7	9.6
Total	1,364	251,985	100.0	75,211	20.5	5.3	9.0	17.4	15.1	20.7	20.9	20.0	23.1	41.2	55.7	36.2	0.0	3.9	10.9

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Ann Arbor MSA	345	111,205	28.1	11,346	22.7	4.9	8.3	17.0	14.5	18.6	19.6	15.1	23.4	40.7	53.0	37.8	0.0	12.5	11.9
Battle Creek MSA	29	2,301	2.4	3,581	21.7	13.8	7.9	17.8	10.3	22.5	19.6	13.8	21.2	40.9	44.8	35.1	0.0	17.2	13.3
Grand Rapids-Wyoming MSA	358	78,286	29.2	22,523	20.9	5.3	8.8	17.4	16.2	21.0	21.7	23.2	22.4	40.1	51.1	32.8	0.0	4.2	15.1
Jackson MSA	45	5,351	3.7	4,629	22.3	11.1	8.3	17.5	15.6	19.4	20.2	17.8	23.8	40.0	55.6	35.5	0.0	0.0	13.1
Kalamazoo-Portage MSA	131	21,899	10.7	10,272	21.4	6.1	6.3	17.3	18.3	17.8	20.7	18.3	22.2	40.7	52.7	40.7	0.0	4.6	13.0
Michigan Non-MSA	188	20,609	15.3	2,906	16.4	8.0	5.0	17.4	22.9	18.1	20.7	21.8	23.3	45.6	41.0	38.8	0.0	6.4	14.8
Monroe MSA	44	5,792	3.6	5,042	19.3	4.5	10.8	18.8	25.0	22.6	22.2	15.9	25.5	39.7	50.0	28.5	0.0	4.5	12.5
Niles-Benton Harbor MSA	24	5,357	2.0	4,354	22.6	12.5	7.8	17.0	12.5	16.5	19.4	0.0	19.0	40.9	66.7	44.3	0.0	8.3	12.3
Warren-Troy-Farmington Hills MSA	63	17,802	5.1	8,752	13.8	0.0	6.3	17.3	3.2	18.0	22.4	36.5	26.1	46.5	55.6	37.1	0.0	4.8	12.6
Total	1,227	268,602	100.0	73,405	20.5	5.9	7.9	17.4	16.4	19.5	20.9	19.7	23.0	41.2	50.8	36.1	0.0	7.2	13.4

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Ann Arbor MSA	423	122,164	28.3	13,316	21.7	4.7	9.1	16.9	14.9	21.1	21.4	17.0	22.7	40.0	55.8	36.3	0.0	7.6	10.8
Battle Creek MSA	30	3,087	2.0	3,481	21.0	10.0	7.2	18.1	10.0	20.4	20.5	23.3	20.5	40.4	50.0	36.1	0.0	6.7	15.8
Grand Rapids-Wyoming MSA	478	117,457	31.9	26,026	21.2	3.6	8.1	17.6	10.7	20.3	21.3	21.1	21.2	39.9	60.9	34.3	0.0	3.8	16.2
Jackson MSA	72	11,992	4.8	4,815	20.7	8.3	7.7	18.3	29.2	19.6	21.3	20.8	22.3	39.7	38.9	34.6	0.0	2.8	15.8
Kalamazoo-Portage MSA	130	33,431	8.7	10,735	22.7	4.6	7.0	16.4	14.6	17.7	20.5	20.8	20.5	40.4	48.5	39.7	0.0	11.5	15.0
Michigan Non-MSA	187	20,090	12.5	3,133	15.2	5.3	4.9	15.7	20.3	18.2	20.5	29.4	22.7	48.5	37.4	41.3	0.0	7.5	13.0
Monroe MSA	55	7,289	3.7	5,474	18.6	9.1	8.8	19.3	14.5	21.6	22.9	23.6	26.6	39.2	45.5	30.1	0.0	7.3	12.9
Niles-Benton Harbor MSA	26	3,766	1.7	4,613	21.7	7.7	6.7	18.2	34.6	15.3	19.9	19.2	17.0	40.2	30.8	47.0	0.0	7.7	14.0
Warren-Troy-Farmington Hills MSA	96	27,923	6.4	10,397	15.0	1.0	6.0	15.7	8.3	17.5	24.1	25.0	23.6	45.2	60.4	39.8	0.0	5.2	13.1
Total	1,497	347,199	100.0	81,990	20.4	4.7	7.6	17.3	14.7	19.4	21.4	21.3	21.9	40.9	53.0	36.8	0.0	6.3	14.3

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the 2018 Geography

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Ann Arbor MSA	105	26,466	21.1	6,940	8.8	5.7	7.0	9.2	4.8	8.5	42.8	46.7	45.4	31.7	32.4	33.8	7.5	10.5	5.3
Battle Creek MSA	16	1,735	3.2	1,254	8.6	12.5	8.2	26.4	18.8	27.7	33.3	6.3	33.7	31.8	62.5	30.4	0.0	0.0	0.0
Grand Rapids MSA	154	31,606	31.0	11,426	4.7	5.2	4.9	18.9	14.3	18.4	37.5	33.8	37.1	38.8	46.8	39.6	0.0	0.0	0.0
Jackson MSA	5	658	1.0	1,874	10.4	0.0	10.4	29.1	0.0	29.6	40.1	20.0	39.3	20.2	80.0	20.8	0.3	0.0	0.0
Kalamazoo-Portage MSA	49	14,707	9.9	4,628	6.4	12.2	5.7	20.1	10.2	21.0	52.1	44.9	48.7	20.9	32.7	24.4	0.5	0.0	0.2
Michigan Non-MSA	72	11,168	14.5	1,014	0.0	0.0	0.0	18.4	16.7	16.9	53.6	52.8	52.5	28.0	30.6	30.7	0.0	0.0	0.0
Monroe MSA	29	5,994	5.8	1,859	0.8	0.0	0.2	15.6	10.3	12.0	72.0	82.8	75.1	11.6	6.9	12.6	0.0	0.0	0.0
Niles-Benton Harbor MSA	14	4,186	2.8	2,039	10.6	28.6	9.5	11.8	14.3	10.0	44.1	14.3	43.5	33.5	42.9	37.0	0.0	0.0	0.0
Warren-Troy-Farmington Hills MSA	53	11,489	10.7	3,821	0.0	0.0	0.0	11.8	11.3	10.0	51.8	56.6	51.5	36.4	32.1	38.6	0.0	0.0	0.0
Total	497	108,009	100.0	34,855	5.9	5.2	5.2	16.9	11.7	15.9	44.8	44.1	44.7	30.9	36.8	33.1	1.5	2.2	1.1

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Ann Arbor MSA	116	28,353	21.8	6,940	8.9	5.2	7.0	9.1	0.9	8.5	43.0	56.0	45.4	31.6	26.7	33.8	7.4	11.2	5.3
Battle Creek MSA	17	1,885	3.2	1,254	8.5	11.8	8.2	26.3	29.4	27.7	33.4	11.8	33.7	31.8	47.1	30.4	0.0	0.0	0.0
Grand Rapids-Wyoming MSA	177	35,735	33.3	11,426	4.7	3.4	4.9	18.9	14.7	18.4	37.6	33.3	37.1	38.7	48.6	39.6	0.0	0.0	0.0
Jackson MSA	12	959	2.3	1,874	10.2	0.0	10.4	28.7	8.3	29.6	41.0	41.7	39.3	19.8	50.0	20.8	0.2	0.0	0.0
Kalamazoo-Portage MSA	51	11,954	9.6	4,628	6.4	3.9	5.7	19.8	9.8	21.0	52.5	45.1	48.7	20.8	41.2	24.4	0.5	0.0	0.2
Michigan Non-MSA	69	11,028	13.0	1,014	0.0	0.0	0.0	18.1	23.2	16.9	53.8	49.3	52.5	28.1	27.5	30.7	0.0	0.0	0.0
Monroe MSA	25	5,616	4.7	1,859	0.8	0.0	0.2	15.0	4.0	12.0	72.9	84.0	75.1	11.3	12.0	12.6	0.0	0.0	0.0
Niles-Benton Harbor MSA	19	4,902	3.6	2,039	10.7	26.3	9.5	12.1	15.8	10.0	45.0	21.1	43.5	32.2	36.8	37.0	0.0	0.0	0.0
Warren-Troy-Farmington Hills MSA	45	8,806	8.5	3,821	0.0	0.0	0.0	11.3	20.0	10.0	52.6	48.9	51.5	36.1	31.1	38.6	0.0	0.0	0.0
Total	531	109,238	100.0	34,855	5.9	4.0	5.2	16.7	12.6	15.9	45.3	44.3	44.7	30.6	36.7	33.1	1.4	2.4	1.1

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Ann Arbor MSA	135	30,692	25.1	8,023	4.9	0.7	3.1	12.2	5.9	10.8	49.8	64.4	50.6	31.1	28.9	35.3	1.9	0.0	0.2
Battle Creek MSA	14	2,593	2.6	1,355	8.8	21.4	8.5	23.4	35.7	23.6	37.9	14.3	36.7	29.9	28.6	31.2	0.0	0.0	0.0
Grand Rapids-Wyoming MSA	189	35,055	35.1	13,729	6.4	5.3	5.8	18.8	22.2	15.4	39.4	22.2	35.6	35.3	50.3	43.1	0.0	0.0	0.0
Jackson MSA	7	1,554	1.3	1,820	15.7	0.0	15.4	15.5	0.0	14.6	44.8	71.4	42.0	23.9	28.6	28.0	0.1	0.0	0.0
Kalamazoo-Portage MSA	32	8,632	5.9	5,551	5.8	3.1	4.6	18.3	6.3	15.0	53.8	62.5	50.6	22.2	28.1	29.8	0.0	0.0	0.0
Michigan Non-MSA	79	10,444	14.7	1,200	0.0	0.0	0.0	7.1	6.3	7.3	50.2	45.6	45.5	42.7	48.1	47.3	0.0	0.0	0.0
Monroe MSA	29	5,251	5.4	1,949	0.9	0.0	0.5	12.1	6.9	8.8	70.7	86.2	71.6	16.3	6.9	19.1	0.0	0.0	0.0
Niles-Benton Harbor MSA	7	385	1.3	2,374	10.1	14.3	8.6	11.1	0.0	8.3	41.6	0.0	40.0	37.3	85.7	43.1	0.0	0.0	0.0
Warren-Troy-Farmington Hills MSA	46	7,620	8.6	5,911	2.7	2.2	2.1	10.1	17.4	6.3	50.7	26.1	46.1	36.5	54.3	45.5	0.0	0.0	0.0
Total	538	102,226	100.0	41,912	6.2	3.2	4.9	15.3	13.4	12.5	47.0	42.6	44.5	31.2	40.9	38.2	0.4	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Ann Arbor MSA	105	26,466	21.1	6,940	82.0	41.0	52.3	6.7	53.3	11.3	5.7
Battle Creek MSA	16	1,735	3.2	1,254	76.1	56.3	40.0	7.9	37.5	16.1	6.3
Grand Rapids MSA	154	31,606	31.0	11,426	77.9	43.5	43.9	9.3	52.6	12.7	3.9
Jackson MSA	5	658	1.0	1,874	78.1	40.0	45.1	8.2	60.0	13.7	0.0
Kalamazoo-Portage MSA	49	14,707	9.9	4,628	78.9	32.7	48.8	7.5	65.3	13.6	2.0
Michigan Non-MSA	72	11,168	14.5	1,014	81.3	45.8	48.4	6.1	52.8	12.6	1.4
Monroe MSA	29	5,994	5.8	1,859	81.7	51.7	56.6	6.3	48.3	12.0	0.0
Niles-Benton Harbor MSA	14	4,186	2.8	2,039	80.3	50.0	48.9	6.5	42.9	13.1	7.1
Warren-Troy-Farmington Hills MSA	53	11,489	10.7	3,821	85.2	49.1	52.9	6.0	50.9	8.8	0.0
Total	497	108,009	100.0	34,855	79.9	43.9	48.3	7.6	52.9	12.4	3.2

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Ann Arbor MSA	116	28,353	21.8	6,940	81.7	49.1	52.3	6.9	47.4	11.4	3.4
Battle Creek MSA	17	1,885	3.2	1,254	76.9	58.8	40.0	7.9	41.2	15.2	0.0
Grand Rapids-Wyoming MSA	177	35,735	33.3	11,426	77.9	46.9	43.9	9.5	50.3	12.6	2.8
Jackson MSA	12	959	2.3	1,874	78.5	50.0	45.1	8.2	50.0	13.3	0.0
Kalamazoo-Portage MSA	51	11,954	9.6	4,628	79.5	43.1	48.8	7.4	45.1	13.1	11.8
Michigan Non-MSA	69	11,028	13.0	1,014	81.9	49.3	48.4	6.1	47.8	12.1	2.9
Monroe MSA	25	5,616	4.7	1,859	81.6	60.0	56.6	6.4	40.0	12.0	0.0
Niles-Benton Harbor MSA	19	4,902	3.6	2,039	81.3	47.4	48.9	6.3	52.6	12.5	0.0
Warren-Troy-Farmington Hills MSA	45	8,806	8.5	3,821	85.5	53.3	52.9	6.0	44.4	8.5	2.2
Total	531	109,238	100.0	34,855	80.2	49.0	48.3	7.7	47.6	12.2	3.4

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Ann Arbor MSA	135	30,692	25.1	8,023	81.9	50.4	42.1	6.8	48.1	11.3	1.5
Battle Creek MSA	14	2,593	2.6	1,355	77.8	64.3	40.4	7.4	35.7	14.7	0.0
Grand Rapids-Wyoming MSA	189	35,055	35.1	13,729	77.7	49.7	38.0	9.6	46.0	12.7	4.2
Jackson MSA	7	1,554	1.3	1,820	79.0	42.9	42.6	7.9	57.1	13.1	0.0
Kalamazoo-Portage MSA	32	8,632	5.9	5,551	79.7	56.3	43.1	7.2	34.4	13.1	9.4
Michigan Non-MSA	79	10,444	14.7	1,200	82.3	46.8	42.0	5.7	51.9	12.0	1.3
Monroe MSA	29	5,251	5.4	1,949	82.2	58.6	47.7	6.1	37.9	11.7	3.4
Niles-Benton Harbor MSA	7	385	1.3	2,374	82.0	85.7	44.3	6.1	0.0	11.9	14.3
Warren-Troy-Farmington Hills MSA	46	7,620	8.6	5,911	85.4	47.8	42.3	6.0	52.2	8.6	0.0
Total	538	102,221	100.0	41,912	80.3	50.9	41.3	7.6	46.1	12.1	3.0
Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2018

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Ann Arbor MSA	0	0	0.0	86	3.1	0.0	0.0	5.4	0.0	0.0	58.6	0.0	67.4	32.8	0.0	32.6	0.1	0.0	0.0
Battle Creek MSA	0	0	0.0	46	1.4	0.0	0.0	7.0	0.0	0.0	63.0	0.0	69.6	28.6	0.0	30.4	0.0	0.0	0.0
Grand Rapids MSA	0	0	0.0	119	1.6	0.0	0.0	11.4	0.0	7.6	46.7	0.0	48.7	40.3	0.0	43.7	0.0	0.0	0.0
Jackson MSA	0	0	0.0	39	1.3	0.0	0.0	11.1	0.0	2.6	61.4	0.0	64.1	26.3	0.0	33.3	0.0	0.0	0.0
Kalamazoo-Portage MSA	0	0	0.0	107	1.8	0.0	0.0	19.9	0.0	32.7	59.7	0.0	54.2	18.6	0.0	13.1	0.1	0.0	0.0
Michigan Non-MSA	2	322	66.7	137	0.0	0.0	0.0	2.7	0.0	0.7	62.9	50.0	62.8	34.5	50.0	36.5	0.0	0.0	0.0
Monroe MSA	1	36	33.3	121	0.0	0.0	0.0	3.9	0.0	0.0	83.4	100.0	85.1	12.7	0.0	14.9	0.0	0.0	0.0
Niles-Benton Harbor MSA	0	0	0.0	82	2.0	0.0	0.0	7.7	0.0	3.7	68.5	0.0	73.2	21.9	0.0	23.2	0.0	0.0	0.0
Warren-Troy-Farmington Hills MSA	0	0	0.0	32	0.0	0.0	0.0	3.8	0.0	3.1	65.1	0.0	81.3	31.0	0.0	15.6	0.0	0.0	0.0
Total	3	358	100.0	769	1.4	0.0	0.0	9.1	0.0	6.5	61.3	66.7	65.8	28.2	33.3	27.7	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Ann Arbor MSA	1	105	33.3	86	2.5	0.0	0.0	5.0	0.0	0.0	59.4	0.0	67.4	33.0	100.0	32.6	0.1	0.0	0.0
Battle Creek MSA	0	0	0.0	46	1.5	0.0	0.0	7.1	0.0	0.0	63.5	0.0	69.6	28.0	0.0	30.4	0.0	0.0	0.0
Grand Rapids-Wyoming MSA	0	0	0.0	119	1.6	0.0	0.0	10.8	0.0	7.6	46.5	0.0	48.7	41.1	0.0	43.7	0.0	0.0	0.0
Jackson MSA	0	0	0.0	39	2.0	0.0	0.0	8.8	0.0	2.6	63.3	0.0	64.1	25.9	0.0	33.3	0.0	0.0	0.0
Kalamazoo-Portage MSA	0	0	0.0	107	1.5	0.0	0.0	20.3	0.0	32.7	59.4	0.0	54.2	18.7	0.0	13.1	0.0	0.0	0.0
Michigan Non-MSA	2	330	66.7	137	0.0	0.0	0.0	2.3	0.0	0.7	63.5	50.0	62.8	34.2	50.0	36.5	0.0	0.0	0.0
Monroe MSA	0	0	0.0	121	0.0	0.0	0.0	3.8	0.0	0.0	83.1	0.0	85.1	13.1	0.0	14.9	0.0	0.0	0.0
Niles-Benton Harbor MSA	0	0	0.0	82	1.7	0.0	0.0	6.4	0.0	3.7	70.5	0.0	73.2	21.4	0.0	23.2	0.0	0.0	0.0
Warren-Troy-Farmington Hills MSA	0	0	0.0	32	0.0	0.0	0.0	3.8	0.0	3.1	64.7	0.0	81.3	31.5	0.0	15.6	0.0	0.0	0.0
Total	3	435	100.0	769	1.3	0.0	0.0	8.7	0.0	6.5	61.8	33.3	65.8	28.2	66.7	27.7	0.0	0.0	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2016

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Ann Arbor MSA	1	72	16.7	54	1.4	0.0	0.0	5.4	0.0	0.0	68.9	100.0	70.4	24.3	0.0	29.6	0.0	0.0	0.0
Battle Creek MSA	0	0	0.0	34	2.0	0.0	0.0	11.5	0.0	14.7	57.5	0.0	41.2	28.9	0.0	44.1	0.0	0.0	0.0
Grand Rapids-Wyoming MSA	1	497	16.7	112	1.3	0.0	0.0	7.5	0.0	4.5	46.6	0.0	60.7	44.6	100.0	34.8	0.0	0.0	0.0
Jackson MSA	0	0	0.0	47	1.9	0.0	0.0	4.4	0.0	0.0	60.4	0.0	61.7	33.3	0.0	38.3	0.0	0.0	0.0
Kalamazoo-Portage MSA	1	10	16.7	99	1.2	0.0	0.0	17.7	0.0	32.3	63.0	100.0	57.6	18.1	0.0	10.1	0.0	0.0	0.0
Michigan Non-MSA	2	314	33.3	132	0.0	0.0	0.0	0.6	0.0	0.0	51.7	50.0	51.5	47.7	50.0	48.5	0.0	0.0	0.0
Monroe MSA	1	30	16.7	118	0.0	0.0	0.0	2.6	0.0	0.8	87.8	100.0	94.1	9.6	0.0	5.1	0.0	0.0	0.0
Niles-Benton Harbor MSA	0	0	0.0	55	1.8	0.0	0.0	3.9	0.0	3.6	62.0	0.0	72.7	32.4	0.0	23.6	0.0	0.0	0.0
Warren-Troy-Farmington Hills MSA	0	0	0.0	30	0.8	0.0	0.0	4.5	0.0	0.0	61.7	0.0	76.7	33.0	0.0	23.3	0.0	0.0	0.0
Total	6	923	100.0	681	1.2	0.0	0.0	7.1	0.0	6.6	61.5	66.7	65.8	30.2	33.3	27.6	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Ann Arbor MSA	0	0	0.0	86	95.1	0.0	53.5	3.0	0.0	2.0	0.0
Battle Creek MSA	0	0	0.0	46	95.4	0.0	41.3	3.0	0.0	1.6	0.0
Grand Rapids MSA	0	0	0.0	119	92.6	0.0	47.9	5.3	0.0	2.0	0.0
Jackson MSA	0	0	0.0	39	98.2	0.0	38.5	1.3	0.0	0.5	0.0
Kalamazoo-Portage MSA	0	0	0.0	107	92.4	0.0	48.6	5.3	0.0	2.3	0.0
Michigan Non-MSA	2	322	66.7	137	96.3	100.0	43.8	1.8	0.0	1.8	0.0
Monroe MSA	1	36	33.3	121	96.9	100.0	68.6	2.1	0.0	1.0	0.0
Niles-Benton Harbor MSA	0	0	0.0	82	95.9	0.0	42.7	3.7	0.0	0.4	0.0
Warren-Troy-Farmington Hills MSA	0	0	0.0	32	96.8	0.0	50.0	2.3	0.0	1.0	0.0
Total	3	358	100.0	769	95.0	100.0	49.8	3.5	0.0	1.6	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Ann Arbor MSA	1	105	33.3	86	95.9	100.0	53.5	2.6	0.0	1.5	0.0
Battle Creek MSA	0	0	0.0	46	96.0	0.0	41.3	2.8	0.0	1.3	0.0
Grand Rapids-Wyoming MSA	0	0	0.0	119	93.2	0.0	47.9	5.0	0.0	1.8	0.0
Jackson MSA	0	0	0.0	39	99.0	0.0	38.5	0.7	0.0	0.2	0.0
Kalamazoo-Portage MSA	0	0	0.0	107	92.6	0.0	48.6	5.3	0.0	2.1	0.0
Michigan Non-MSA	2	330	66.7	137	97.5	100.0	43.8	1.6	0.0	0.8	0.0
Monroe MSA	0	0	0.0	121	97.0	0.0	68.6	2.1	0.0	1.0	0.0
Niles-Benton Harbor MSA	0	0	0.0	82	96.0	0.0	42.7	3.6	0.0	0.3	0.0
Warren-Troy-Farmington Hills MSA	0	0	0.0	32	96.6	0.0	50.0	2.3	0.0	1.1	0.0
Total	3	435	100.0	769	95.4	100.0	49.8	3.3	0.0	1.3	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Ann Arbor MSA	1	72	16.7	54	95.8	100.0	37.0	2.6	0.0	1.5	0.0
Battle Creek MSA	0	0	0.0	34	96.2	0.0	26.5	2.6	0.0	1.3	0.0
Grand Rapids-Wyoming MSA	1	497	16.7	112	93.3	100.0	50.0	5.0	0.0	1.7	0.0
Jackson MSA	0	0	0.0	47	99.3	0.0	29.8	0.5	0.0	0.2	0.0
Kalamazoo-Portage MSA	1	10	16.7	99	92.9	100.0	42.4	4.9	0.0	2.2	0.0
Michigan Non-MSA	2	314	33.3	132	98.0	100.0	48.5	1.4	0.0	0.6	0.0
Monroe MSA	1	30	16.7	118	97.0	100.0	64.4	2.0	0.0	0.9	0.0
Niles-Benton Harbor MSA	0	0	0.0	55	96.5	0.0	49.1	3.2	0.0	0.4	0.0
Warren-Troy-Farmington Hills MSA	0	0	0.0	30	97.3	0.0	30.0	1.6	0.0	1.2	0.0
Total	6	923	100.0	681	95.7	100.0	46.5	3.0	0.0	1.3	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

State of Minnesota

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Mankato-North Mankato MSA	15	2,349	4.9	1,837	0.0	0.0	0.0	12.0	40.0	17.2	80.1	53.3	76.5	7.9	6.7	6.3	0.0	0.0	0.0
Minneapolis-St. Paul-Bloomington MSA	289	65,480	95.1	115,851	2.6	2.8	3.5	17.1	13.5	17.9	46.3	39.4	45.9	34.0	44.3	32.5	0.1	0.0	0.1
Total	304	67,829	100.0	117,688	2.6	2.6	3.4	17.0	14.8	17.9	47.0	40.1	46.4	33.4	42.4	32.1	0.1	0.0	0.1

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Mankato-North Mankato MSA	15	2,349	4.9	1,837	20.9	0.0	9.7	17.6	13.3	21.0	22.9	13.3	21.3	38.5	20.0	28.6	0.0	53.3	19.4
Minneapolis-St. Paul-Bloomington MSA	289	65,480	95.1	115,851	20.7	5.5	9.2	17.0	19.0	21.7	21.6	16.3	21.8	40.6	43.9	30.0	0.0	15.2	17.3
Total	304	67,829	100.0	117,688	20.7	5.3	9.2	17.0	18.8	21.6	21.7	16.1	21.8	40.6	42.8	30.0	0.0	17.1	17.3

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2018

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Mankato-North Mankato MSA	27	4,980	3.5	1,050	0.0	0.0	0.0	28.1	33.3	27.5	67.0	66.7	67.8	4.9	0.0	4.7	0.0	0.0	0.0
Minneapolis-St. Paul-Bloomington MSA	748	207,874	96.5	58,421	5.3	4.1	4.7	18.3	19.0	17.1	44.5	48.0	44.4	31.5	28.7	33.5	0.4	0.1	0.2
Total	775	212,854	100.0	59,471	5.2	4.0	4.6	18.5	19.5	17.3	45.0	48.6	44.8	31.0	27.7	33.0	0.4	0.1	0.2

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Mankato-North Mankato MSA	27	4,980	3.5	1,050	76.9	40.7	51.0	7.5	44.4	15.6	14.8
Minneapolis-St Paul-Bloomington MSA	748	207,874	96.5	58,421	84.0	29.1	55.9	6.9	66.3	9.1	4.5
Total	775	212,854	100.0	59,471	83.9	29.5	55.8	6.9	65.5	9.3	4.9

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2018

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Mankato-North Mankato MSA	4	142	66.7	119	0.0	0.0	0.0	5.5	0.0	0.8	77.5	100.0	71.4	17.0	0.0	27.7	0.0	0.0	0.0
Minneapolis-St Paul-Bloomington MSA	2	240	33.3	436	2.1	0.0	0.7	13.4	0.0	4.4	50.0	100.0	55.3	34.5	0.0	39.5	0.1	0.0	0.2
Total	6	382	100.0	555	1.9	0.0	0.5	12.7	0.0	3.6	52.3	100.0	58.7	33.0	0.0	36.9	0.1	0.0	0.2

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Mankato-North Mankato MSA	4	142	66.7	119	96.1	100.0	31.1	2.3	0.0	1.6	0.0
Minneapolis-St Paul-Bloomington MSA	2	240	33.3	436	95.1	100.0	52.5	2.8	0.0	2.1	0.0
Total	6	382	100.0	555	95.2	100.0	47.9	2.8	0.0	2.1	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

State of Wisconsin

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Appleton MSA	89	10,847	6.3	6,750	0.0	0.0	0.0	11.9	7.9	11.2	80.6	79.8	82.0	7.5	12.4	6.8	0.0	0.0	0.0
Eau Claire MSA	55	6,317	3.9	5,199	0.0	0.0	0.0	11.4	27.3	13.0	77.3	50.9	75.8	11.3	21.8	11.2	0.0	0.0	0.0
Janesville Beloit MSA	108	10,889	7.6	5,806	0.8	0.0	1.0	21.4	12.0	18.5	46.2	48.1	46.3	31.7	39.8	34.2	0.0	0.0	0.0
Madison MSA	623	90,462	43.8	25,720	0.6	1.1	0.8	13.7	11.6	11.6	60.0	62.4	59.0	25.6	24.9	28.4	0.0	0.0	0.1
Milwaukee-Waukesha-West Allis MSA	199	57,613	14.0	38,797	8.9	5.0	5.1	14.5	11.6	13.6	32.0	30.7	32.8	44.5	52.8	48.5	0.0	0.0	0.0
Oshkosh-Neenah MSA	88	8,408	6.2	5,402	0.0	0.0	0.0	9.9	14.8	11.5	62.5	55.7	60.0	27.6	29.5	28.6	0.0	0.0	0.0
Wisconsin Non-MSA	259	21,886	18.2	7,547	0.0	0.0	0.0	0.8	2.3	1.2	76.2	81.9	72.7	22.8	15.8	26.0	0.1	0.0	0.1
Total	1,421	206,422	100.0	95,221	4.0	1.2	2.3	12.7	10.5	12.1	51.4	60.7	51.3	31.8	27.7	34.3	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "---" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Appleton MSA	55	10,816	4.9	7,074	0.0	0.0	0.0	11.9	7.3	11.0	80.6	83.6	81.4	7.5	9.1	7.6	0.0	0.0	0.0
Eau Claire MSA	54	7,919	4.8	4,471	0.0	0.0	0.0	11.4	13.0	13.0	77.3	66.7	75.7	11.3	20.4	11.3	0.0	0.0	0.0
Fond du Lac MSA	11	2,412	1.0	2,798	1.2	0.0	1.8	2.5	0.0	2.5	87.1	72.7	87.5	9.2	27.3	8.1	0.0	0.0	0.0
Janesville Beloit MSA	80	10,491	7.1	4,977	0.8	1.3	1.0	21.4	16.3	19.6	46.2	57.5	45.8	31.7	25.0	33.7	0.0	0.0	0.0
Madison MSA	401	90,208	35.8	20,265	0.6	0.7	0.7	13.7	15.5	12.5	60.0	62.8	58.3	25.6	20.9	28.3	0.0	0.0	0.2
Milwaukee-Waukesha-West Allis MSA	215	97,839	19.2	35,042	8.9	7.9	4.7	14.5	12.6	14.5	32.0	36.7	33.8	44.5	42.8	47.0	0.0	0.0	0.0
Oshkosh-Neenah MSA	96	10,755	8.6	5,843	0.0	0.0	0.0	9.9	9.4	11.2	62.5	72.9	60.6	27.6	17.7	28.2	0.0	0.0	0.0
Wisconsin Non-MSA	209	29,188	18.6	7,501	0.0	0.0	0.0	1.8	1.0	1.6	75.7	81.8	72.2	22.4	17.2	26.1	0.1	0.0	0.0
Total	1,121	259,628	100.0	87,971	3.9	1.9	2.2	12.3	11.1	12.3	53.0	63.2	52.8	30.8	23.9	32.7	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Appleton MSA	55	8,197	4.2	7,716	0.0	0.0	0.0	4.5	3.6	4.0	83.3	89.1	81.3	12.2	7.3	14.7	0.0	0.0	0.0
Eau Claire MSA	73	7,944	5.6	5,069	0.0	0.0	0.0	11.9	17.8	11.1	73.5	74.0	74.3	14.6	8.2	14.6	0.0	0.0	0.0
Fond du Lac MSA	14	1,624	1.1	2,964	0.0	0.0	0.0	6.1	7.1	6.4	85.4	92.9	82.2	8.4	0.0	11.4	0.0	0.0	0.0
Janesville-Beloit MSA	81	10,214	6.2	5,325	4.6	4.9	2.9	15.7	12.3	11.7	55.9	48.1	56.1	23.9	34.6	29.3	0.0	0.0	0.0
Madison MSA	546	100,127	41.9	24,532	1.3	1.1	1.0	13.4	12.1	10.9	62.4	63.7	61.3	22.9	23.1	26.8	0.0	0.0	0.0
Milwaukee-Waukesha-West Allis MSA	193	57,504	14.8	41,634	8.2	4.1	3.1	15.3	13.5	10.4	36.6	42.0	37.1	40.0	40.4	49.3	0.0	0.0	0.0
Oshkosh-Neenah MSA	108	13,608	8.3	5,890	0.0	0.0	0.0	10.9	10.2	10.7	69.9	64.8	68.7	19.3	25.0	20.6	0.0	0.0	0.0
Wisconsin Non-MSA	232	30,261	17.8	7,988	0.0	0.0	0.0	3.2	1.3	2.3	65.6	73.3	58.3	31.2	25.4	39.4	0.0	0.0	0.0
Total	1,302	229,479	100.0	101,118	3.9	1.4	1.7	12.1	10.1	9.4	55.0	63.3	54.1	29.0	25.2	34.8	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Appleton MSA	89	10,847	6.3	6,750	19.0	6.7	9.8	19.0	25.8	23.1	24.2	25.8	24.4	37.9	40.4	31.6	0.0	1.1	11.2
Eau Claire MSA	55	6,317	3.9	5,199	18.6	10.9	8.5	18.5	29.1	21.8	24.2	18.2	24.4	38.7	40.0	34.3	0.0	1.8	11.0
Janesville Beloit MSA	108	10,889	7.6	5,806	20.7	5.6	9.3	18.2	25.0	19.9	21.6	30.6	25.5	39.6	36.1	32.6	0.0	2.8	12.7
Madison MSA	623	90,462	43.8	25,720	19.8	12.8	8.0	17.7	21.2	19.3	23.4	26.6	26.6	39.0	36.0	39.0	0.0	3.4	7.0
Milwaukee-Waukesha-West Allis MSA	199	57,613	14.0	38,797	25.7	8.0	8.0	16.3	16.1	18.4	19.0	21.6	22.2	39.0	47.2	39.8	0.0	6.5	11.6
Oshkosh-Neenah MSA	88	8,408	6.2	5,402	18.6	13.6	9.4	18.4	18.2	22.9	24.0	28.4	22.9	39.0	35.2	32.5	0.0	4.5	12.4
Wisconsin Non-MSA	259	21,886	18.2	7,547	16.3	5.4	7.0	18.2	22.4	18.5	22.3	30.5	22.2	43.2	39.4	41.0	0.0	2.3	11.2
Total	1,421	206,422	100.0	95,221	22.0	9.9	8.2	17.3	21.4	19.5	21.3	26.7	23.9	39.3	38.6	38.0	0.0	3.4	10.4

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Appleton MSA	55	10,816	4.9	7,074	19.0	10.9	9.7	19.0	12.7	22.1	24.2	41.8	24.4	37.9	30.9	32.1	0.0	3.6	11.7
Eau Claire MSA	54	7,919	4.8	4,471	18.6	14.8	8.2	18.5	11.1	20.1	24.2	27.8	22.9	38.7	37.0	34.4	0.0	9.3	14.4
Fond du Lac MSA	11	2,412	1.0	2,798	17.0	0.0	6.8	18.4	9.1	22.6	25.2	9.1	24.5	39.4	72.7	33.5	0.0	9.1	12.7
Janesville Beloit MSA	80	10,491	7.1	4,977	20.7	10.0	7.4	18.2	27.5	20.7	21.6	31.3	24.6	39.6	31.3	33.0	0.0	0.0	14.3
Madison MSA	401	90,208	35.8	20,265	19.8	11.7	6.8	17.7	23.7	19.8	23.4	25.9	24.8	39.0	35.9	39.3	0.0	2.7	9.4
Milwaukee-Waukesha-West Allis MSA	215	97,839	19.2	35,042	25.7	6.5	6.4	16.3	18.1	16.3	19.0	20.5	22.3	39.0	43.3	40.3	0.0	11.6	14.8
Oshkosh-Neenah MSA	96	10,755	8.6	5,843	18.6	11.5	7.4	18.4	30.2	21.8	24.0	26.0	23.1	39.0	32.3	34.7	0.0	0.0	13.0
Wisconsin Non-MSA	209	29,188	18.6	7,501	16.5	7.7	5.9	18.4	23.9	17.5	22.1	23.4	21.4	42.9	41.6	42.0	0.0	3.3	13.2
Total	1,121	259,628	100.0	87,971	21.8	9.8	6.9	17.4	22.2	18.7	21.4	25.5	23.2	39.3	37.9	38.2	0.0	4.6	12.9

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Appleton MSA	55	8,197	4.2	7,716	17.2	7.3	8.1	19.1	29.1	21.8	26.0	16.4	24.1	37.7	47.3	32.8	0.0	0.0	13.3
Eau Claire MSA	73	7,944	5.6	5,069	19.0	23.3	9.3	19.1	23.3	22.3	23.8	30.1	22.6	38.1	23.3	32.6	0.0	0.0	13.2
Fond du Lac MSA	14	1,624	1.1	2,964	17.5	0.0	7.3	18.6	35.7	19.6	26.8	21.4	24.9	37.0	42.9	36.3	0.0	0.0	11.9
Janesville-Beloit MSA	81	10,214	6.2	5,325	19.7	7.4	5.5	18.5	19.8	18.2	22.3	25.9	22.7	39.5	45.7	39.3	0.0	1.2	14.3
Madison MSA	546	100,127	41.9	24,532	18.5	10.6	6.7	18.1	22.3	17.9	24.8	28.9	23.9	38.6	37.4	40.7	0.0	0.7	10.7
Milwaukee-Waukesha-West Allis MSA	193	57,504	14.8	41,634	24.1	9.3	5.3	17.1	16.1	15.1	20.2	24.9	20.8	38.6	44.6	43.7	0.0	5.2	15.1
Oshkosh-Neenah MSA	108	13,608	8.3	5,890	18.0	11.1	7.7	18.4	25.0	20.1	25.6	24.1	22.2	38.0	39.8	35.0	0.0	0.0	15.0
Wisconsin Non-MSA	232	30,261	17.8	7,988	15.9	7.3	5.2	17.6	25.0	15.2	23.3	20.3	20.7	43.2	47.0	45.5	0.0	0.4	13.3
Total	1,302	229,479	100.0	101,118	20.6	10.1	6.3	17.8	22.4	17.2	22.6	25.7	22.2	38.9	40.6	40.8	0.0	1.2	13.5

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2018

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Appleton MSA	5	1,542	3.2	2,356	0.0	0.0	0.0	12.7	0.0	11.6	80.6	100.0	80.4	6.6	0.0	8.0	0.0	0.0	0.0
Eau Claire MSA	1	150	0.6	1,978	0.0	0.0	0.0	18.7	0.0	16.1	70.8	100.0	73.3	10.5	0.0	10.6	0.0	0.0	0.0
Janesville Beloit MSA	8	999	5.1	1,582	1.3	0.0	1.2	27.4	25.0	24.0	37.5	62.5	36.9	33.8	12.5	37.9	0.0	0.0	0.0
Madison MSA	48	10,051	30.4	8,813	2.2	0.0	1.7	17.5	14.6	17.6	50.3	47.9	50.3	28.2	37.5	29.1	1.8	0.0	1.3
Milwaukee-Waukesha-West Allis MSA	86	22,043	54.4	22,026	13.0	2.3	9.2	14.0	5.8	11.8	31.8	26.7	30.8	41.2	65.1	48.1	0.1	0.0	0.0
Oshkosh-Neenah MSA	2	86	1.3	1,721	0.0	0.0	0.0	18.0	0.0	19.6	57.0	100.0	52.5	25.0	0.0	27.9	0.0	0.0	0.0
Wisconsin Non-MSA	8	2,014	5.1	3,252	0.0	0.0	0.0	1.0	0.0	0.7	79.0	100.0	74.6	19.5	0.0	24.4	0.5	0.0	0.3
Total	15	36,885	100.0	41,728	6.3	1.3	5.2	14.8	8.9	13.2	47.5	42.4	44.3	30.9	47.5	37.0	0.5	0.0	0.3

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the 2017 Geography

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Appleton MSA	7	1,876	4.9	2,356	0.0	0.0	0.0	12.9	0.0	11.6	80.8	100.0	80.4	6.3	0.0	8.0	0.0	0.0	0.0
Eau Claire MSA	1	250	0.7	1,978	0.0	0.0	0.0	18.6	0.0	16.1	71.0	100.0	73.3	10.4	0.0	10.6	0.0	0.0	0.0
Fond du Lac MSA	1	100	0.7	1,272	9.8	0.0	6.8	5.6	0.0	4.4	78.2	100.0	78.5	6.4	0.0	10.2	0.0	0.0	0.0
Janesville Beloit MSA	3	173	2.1	1,582	1.3	0.0	1.2	27.6	33.3	24.0	37.6	66.7	36.9	33.5	0.0	37.9	0.0	0.0	0.0
Madison MSA	50	15,026	35.2	8,813	2.2	2.0	1.7	17.7	16.0	17.6	50.4	38.0	50.3	28.0	44.0	29.1	1.8	0.0	1.3
Milwaukee-Waukesha-West Allis MSA	70	16,699	49.3	22,026	13.1	4.3	9.2	14.1	5.7	11.8	31.9	14.3	30.8	40.9	75.7	48.1	0.1	0.0	0.0
Oshkosh-Neenah MSA	4	771	2.8	1,721	0.0	0.0	0.0	18.4	25.0	19.6	56.5	75.0	52.5	25.1	0.0	27.9	0.0	0.0	0.0
Wisconsin Non-MSA	6	1,460	4.2	3,471	0.0	0.0	0.0	2.2	0.0	1.6	78.2	50.0	73.8	19.2	50.0	24.4	0.4	0.0	0.3
Total	142	36,355	100.0	43,219	6.4	2.8	5.3	14.7	9.9	12.9	48.6	32.4	45.4	29.8	54.9	36.2	0.5	0.0	0.3

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Appleton MSA	17	4,307	21.8	2,535	0.0	0.0	0.0	11.2	0.0	9.1	80.2	94.1	79.4	8.5	5.9	11.5	0.0	0.0	0.0
Eau Claire MSA	3	463	3.8	1,880	0.0	0.0	0.0	15.0	0.0	14.8	71.9	33.3	69.4	13.1	66.7	15.7	0.0	0.0	0.0
Fond du Lac MSA	0	0	0.0	1,514	0.0	0.0	0.0	19.3	0.0	13.3	74.6	0.0	75.8	6.1	0.0	10.9	0.0	0.0	0.0
Janesville-Beloit MSA	2	155	2.6	1,651	7.9	0.0	5.8	18.9	0.0	15.4	45.0	50.0	45.9	28.1	50.0	33.0	0.0	0.0	0.0
Madison MSA	19	3,723	24.4	11,359	3.9	0.0	2.8	16.0	21.1	12.7	55.7	47.4	57.1	23.8	31.6	27.3	0.6	0.0	0.0
Milwaukee-Waukesha-West Allis MSA	31	7,784	39.7	23,940	10.4	3.2	7.0	15.7	0.0	11.4	35.6	38.7	34.7	38.2	58.1	46.9	0.1	0.0	0.0
Oshkosh-Neenah MSA	4	622	5.1	1,713	0.0	0.0	0.0	16.5	0.0	14.5	65.6	75.0	65.8	17.9	25.0	19.7	0.0	0.0	0.0
Wisconsin Non-MSA	2	115	2.6	3,794	0.0	0.0	0.0	3.2	0.0	2.2	65.2	100.0	59.2	31.6	0.0	38.6	0.0	0.0	0.0
Total	78	17,169	100.0	48,386	5.6	1.3	4.3	14.6	5.1	11.3	51.2	56.4	48.3	28.4	37.2	36.0	0.2	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Appleton MSA	5	1,542	3.2	2,356	74.3	40.0	48.0	9.3	60.0	16.4	0.0
Eau Claire MSA	1	150	0.6	1,978	78.9	100.0	45.7	6.9	0.0	14.2	0.0
Janesville Beloit MSA	8	999	5.1	1,582	79.0	62.5	48.9	6.9	37.5	14.1	0.0
Madison MSA	48	10,051	30.4	8,813	80.9	56.3	52.3	6.8	39.6	12.3	4.2
Milwaukee-Waukesha-West Allis MSA	86	22,043	54.4	22,026	78.6	53.5	49.0	9.3	44.2	12.1	2.3
Oshkosh-Neenah MSA	2	86	1.3	1,721	76.5	100.0	45.8	8.0	0.0	15.5	0.0
Wisconsin Non-MSA	8	2,014	5.1	3,252	78.8	37.5	50.6	6.9	62.5	14.3	0.0
Total	158	36,885	100.0	41,728	78.9	54.4	49.5	8.1	43.0	13.0	2.5

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Appleton MSA	7	1,876	4.9	2,356	74.8	0.0	48.0	9.4	100.0	15.9	0.0
Eau Claire MSA	1	250	0.7	1,978	78.8	0.0	45.7	7.1	100.0	14.2	0.0
Fond du Lac MSA	1	100	0.7	1,272	76.5	100.0	55.8	7.9	0.0	15.6	0.0
Janesville Beloit MSA	3	173	2.1	1,582	79.5	100.0	48.9	7.0	0.0	13.6	0.0
Madison MSA	50	15,026	35.2	8,813	80.8	40.0	52.3	7.0	48.0	12.2	12.0
Milwaukee-Waukesha-West Allis MSA	70	16,699	49.3	22,026	78.2	77.1	49.0	9.7	21.4	12.1	1.4
Oshkosh-Neenah MSA	4	771	2.8	1,721	76.7	50.0	45.8	8.1	25.0	15.2	25.0
Wisconsin Non-MSA	6	1,460	4.2	3,471	79.1	33.3	50.5	6.8	50.0	14.1	16.7
Total	142	36,355	100.0	43,219	78.7	57.7	49.7	8.3	35.9	13.0	6.3

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Appleton MSA	17	4,307	21.8	2,535	74.7	17.6	40.7	9.2	82.4	16.1	0.0
Eau Claire MSA	3	463	3.8	1,880	79.3	100.0	42.2	6.9	0.0	13.8	0.0
Fond du Lac MSA	0	0	0.0	1,514	76.6	0.0	46.2	7.8	0.0	15.6	0.0
Janesville-Beloit MSA	2	155	2.6	1,651	79.7	100.0	45.2	6.8	0.0	13.5	0.0
Madison MSA	19	3,723	24.4	11,359	80.4	73.7	42.7	7.3	26.3	12.4	0.0
Milwaukee-Waukesha-West Allis MSA	31	7,784	39.7	23,940	77.5	29.0	43.2	9.9	71.0	12.5	0.0
Oshkosh-Neenah MSA	4	622	5.1	1,713	77.0	75.0	41.7	8.0	25.0	15.0	0.0
Wisconsin Non-MSA	2	115	2.6	3,794	79.1	100.0	43.1	6.7	0.0	14.1	0.0
Total	78	17,169	100.0	48,386	78.4	46.2	43.0	8.4	53.8	13.2	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2018

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Appleton MSA	0	0	0.0	89	0.0	0.0	0.0	11.0	0.0	6.7	81.8	0.0	87.6	7.2	0.0	5.6	0.0	0.0	0.0
Eau Claire MSA	0	0	0.0	156	0.0	0.0	0.0	12.8	0.0	17.9	79.5	0.0	73.1	7.6	0.0	9.0	0.0	0.0	0.0
Janesville Beloit MSA	0	0	0.0	128	0.8	0.0	0.8	7.4	0.0	1.6	41.1	0.0	50.8	50.7	0.0	46.9	0.0	0.0	0.0
Madison MSA	0	0	0.0	577	0.3	0.0	0.7	15.1	0.0	22.7	62.4	0.0	60.0	22.0	0.0	16.6	0.2	0.0	0.0
Milwaukee-Waukesha-West Allis MSA	0	0	0.0	72	8.6	0.0	5.6	10.4	0.0	8.3	29.3	0.0	20.8	51.7	0.0	65.3	0.0	0.0	0.0
Oshkosh-Neenah MSA	0	0	0.0	45	0.0	0.0	0.0	6.7	0.0	0.0	69.4	0.0	66.7	23.8	0.0	33.3	0.0	0.0	0.0
Wisconsin Non-MSA	1	16	100.0	437	0.0	0.0	0.0	0.2	0.0	0.0	84.0	100.0	87.4	15.8	0.0	12.6	0.0	0.0	0.0
Total	1	16	100.0	1,504	1.6	0.0	0.6	9.6	0.0	11.5	63.4	100.0	68.5	25.3	0.0	19.4	0.1	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Appleton MSA	0	0	0.0	89	0.0	0.0	0.0	11.7	0.0	6.7	80.0	0.0	87.6	8.3	0.0	5.6	0.0	0.0	0.0
Eau Claire MSA	1	179	100.0	156	0.0	0.0	0.0	12.6	100.0	17.9	79.0	0.0	73.1	8.4	0.0	9.0	0.0	0.0	0.0
Fond du Lac MSA	0	0	0.0	161	1.1	0.0	1.2	0.7	0.0	0.0	88.0	0.0	82.0	10.2	0.0	16.8	0.0	0.0	0.0
Janesville Beloit MSA	0	0	0.0	128	0.4	0.0	0.8	7.0	0.0	1.6	41.8	0.0	50.8	50.9	0.0	46.9	0.0	0.0	0.0
Madison MSA	0	0	0.0	577	0.3	0.0	0.7	15.5	0.0	22.7	61.5	0.0	60.0	22.6	0.0	16.6	0.2	0.0	0.0
Milwaukee-Waukesha-West Allis MSA	0	0	0.0	72	8.0	0.0	5.6	11.1	0.0	8.3	28.2	0.0	20.8	52.7	0.0	65.3	0.0	0.0	0.0
Oshkosh-Neenah MSA	0	0	0.0	45	0.0	0.0	0.0	5.8	0.0	0.0	71.5	0.0	66.7	22.8	0.0	33.3	0.0	0.0	0.0
Wisconsin Non-MSA	0	0	0.0	499	0.0	0.0	0.0	0.4	0.0	0.0	84.7	0.0	89.0	14.8	0.0	11.0	0.0	0.0	0.0
Total	1	179	100.0	1,727	1.3	0.0	0.6	9.2	100.0	10.0	65.1	0.0	70.9	24.3	0.0	18.5	0.0	0.0	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2016

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Appleton MSA	0	0	0.0	113	0.0	0.0	0.0	1.6	0.0	0.0	81.4	0.0	89.4	17.0	0.0	10.6	0.0	0.0	0.0
Eau Claire MSA	0	0	0.0	145	0.0	0.0	0.0	12.4	0.0	16.6	75.0	0.0	72.4	12.5	0.0	11.0	0.0	0.0	0.0
Fond du Lac MSA	0	0	0.0	183	0.0	0.0	0.0	3.5	0.0	0.0	86.2	0.0	85.8	10.3	0.0	14.2	0.0	0.0	0.0
Janesville-Beloit MSA	0	0	0.0	114	1.1	0.0	0.0	5.1	0.0	0.0	71.0	0.0	73.7	22.8	0.0	26.3	0.0	0.0	0.0
Madison MSA	0	0	0.0	448	0.3	0.0	0.4	14.8	0.0	16.3	67.8	0.0	72.1	17.0	0.0	11.2	0.2	0.0	0.0
Milwaukee-Waukesha-West Allis MSA	0	0	0.0	76	5.5	0.0	6.6	10.9	0.0	5.3	35.8	0.0	10.5	47.8	0.0	77.6	0.0	0.0	0.0
Oshkosh-Neenah MSA	0	0	0.0	44	0.0	0.0	0.0	5.8	0.0	0.0	82.5	0.0	100.0	11.7	0.0	0.0	0.0	0.0	0.0
Wisconsin Non-MSA	0	0	0.0	407	0.0	0.0	0.0	4.8	0.0	2.5	73.7	0.0	81.3	21.5	0.0	16.2	0.0	0.0	0.0
Total	0	0	0.0	1,530	0.9	0.0	0.5	9.2	0.0	7.3	68.4	0.0	75.4	21.5	0.0	16.9	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Appleton MSA	0	0	0.0	89	94.7	0.0	39.3	3.2	0.0	2.1	0.0
Eau Claire MSA	0	0	0.0	156	97.6	0.0	31.4	2.0	0.0	0.4	0.0
Janesville Beloit MSA	0	0	0.0	128	96.7	0.0	36.7	2.3	0.0	1.0	0.0
Madison MSA	0	0	0.0	577	95.9	0.0	45.2	2.3	0.0	1.8	0.0
Milwaukee-Waukesha-West Allis MSA	0	0	0.0	72	91.7	0.0	70.8	5.3	0.0	2.9	0.0
Oshkosh-Neenah MSA	0	0	0.0	45	96.6	0.0	51.1	2.3	0.0	1.0	0.0
Wisconsin Non-MSA	1	16	100.0	437	95.8	0.0	38.4	3.1	0.0	1.1	100.0
Total	1	16	100.0	1,504	95.4	0.0	42.2	3.0	0.0	1.6	100.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Appleton MSA	0	0	0.0	89	94.8	0.0	39.3	3.1	0.0	2.1	0.0
Eau Claire MSA	1	179	100.0	156	97.8	100.0	31.4	1.5	0.0	0.7	0.0
Fond du Lac MSA	0	0	0.0	161	94.5	0.0	61.5	4.3	0.0	1.1	0.0
Janesville Beloit MSA	0	0	0.0	128	96.6	0.0	36.7	2.5	0.0	0.9	0.0
Madison MSA	0	0	0.0	577	96.6	0.0	45.2	2.1	0.0	1.3	0.0
Milwaukee-Waukesha-West Allis MSA	0	0	0.0	72	92.3	0.0	70.8	5.1	0.0	2.5	0.0
Oshkosh-Neenah MSA	0	0	0.0	45	97.8	0.0	51.1	1.8	0.0	0.5	0.0
Wisconsin Non-MSA	0	0	0.0	499	96.5	0.0	43.9	2.9	0.0	0.7	0.0
Total	1	179	100.0	1,727	95.9	100.0	45.4	2.8	0.0	1.3	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Appleton MSA	0	0	0.0	113	95.6	0.0	55.8	2.6	0.0	1.8	0.0
Eau Claire MSA	0	0	0.0	145	97.8	0.0	34.5	1.4	0.0	0.8	0.0
Fond du Lac MSA	0	0	0.0	183	94.7	0.0	54.1	4.2	0.0	1.1	0.0
Janesville-Beloit MSA	0	0	0.0	114	97.0	0.0	54.4	2.1	0.0	0.9	0.0
Madison MSA	0	0	0.0	448	96.8	0.0	44.0	1.9	0.0	1.3	0.0
Milwaukee-Waukesha-West Allis MSA	0	0	0.0	76	92.3	0.0	64.5	4.8	0.0	2.9	0.0
Oshkosh-Neenah MSA	0	0	0.0	44	97.8	0.0	50.0	1.7	0.0	0.5	0.0
Wisconsin Non-MSA	0	0	0.0	407	97.1	0.0	45.0	2.3	0.0	0.6	0.0
Total	0	0	0.0	1,530	96.2	0.0	47.4	2.5	0.0	1.3	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0