



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

September 9, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Carmi
Charter Number 4934

201 East Main Street
Carmi, IL 62821

Office of the Comptroller of the Currency

8777 Purdue Road
Indianapolis, IN 46268

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

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Overall CRA Rating

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

The lending test is rated: Satisfactory

The community development test is rated: Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on a combination of the bank's assessment areas (AAs) located in the states of Illinois and Indiana. The Lending Test ratings for each state were Satisfactory and equally weighed to determine the overall Lending Test rating.
- The bank's loan-to-deposit (LTD) ratio is reasonable.
- A substantial majority of the bank's loans were originated inside the bank's AAs.
- Community development (CD) lending had a positive impact in the AAs.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the First National Bank of Carmi's (FNB or bank) LTD ratio is reasonable.

FNB's quarterly LTD ratio averaged 80.1 percent during the 10-quarter period ending December 31, 2018. The LTD ratio fluctuated from a low of 76.5 percent for the quarter ended March 31, 2017, to a high of 84.3 percent for the quarter ended September 30, 2017. The bank's average LTD ratio is comparable, albeit lower, than the peer group average ratio of 86.4 percent for the same 10-quarter period. We considered the average LTD ratios of five other banks with offices in the AAs. These banks had asset sizes between \$84.3 million and \$429.7 million, with average LTD ratios between 78.4 percent and 94.5 percent.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AAs.

The bank originated and purchased 82.7 percent by number and 74.5 percent of loans by dollar volume of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. The following table details the number and dollar volume of loans originated inside versus outside of the bank's AAs.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	427	83.1	87	16.9	514	48,121	77.5	13,960	22.5	62,081
Business	28	70.0	12	30.0	40	4,057	44.4	5,088	55.6	9,145
Farm	36	90.0	4	10.0	40	7,753	84.4	1,436	15.6	9,188
Total	491	82.7	103	17.3	594	59,931	74.5	20,484	25.5	80,414

Source: Evaluation Period: 7/1/2016 - 12/31/2018 Bank Data

Description of Institution

FNB is a federally chartered national bank headquartered in Carmi, Illinois. The bank is wholly-owned by Southern Illinois Bancorp, a one-bank holding company. As of December 31, 2018, FNB reported total assets of \$405.5 million and \$37.2 million in tier 1 capital. FNB has three subsidiaries, Southern IL Capital Trust, First Insurance Agency of White County, Inc, and Southern Illinois Title Insurance Service, Inc.

FNB offers traditional banking products and services at its main office in Carmi, Illinois and nine branch locations in Illinois and Indiana. Two branches are in upper-income census tracts (CTs), six offices are in middle income CTs, and one in a moderate-income CT. The bank has 11 deposit-taking automated teller machines (ATMs). FNB closed one Indiana branch in Vanderburgh County since the previous Community Reinvestment Act (CRA) performance evaluation. In addition to its branch and ATM network, FNB's delivery channels include internet, mobile, and telephone banking.

The bank's AA consist of one AA in Illinois and two AAs in Indiana. The two AAs within the state of Indiana are the Evansville IN-KY Metropolitan Statistical Area (MSA) and IN non-MSA. The Evansville IN-KY MSA AA consists of 56 CTs in Vanderburgh and Posey Counties and the IN non-MSA AA consists of all CTs in Gibson County. The AA in Illinois includes the IL non-MSA AA, which encompasses all CTs in Edwards, Wabash, and White Counties.

At December 31, 2018, the bank's loan portfolio totaled \$282.5 million and represented 69.7 percent of total assets. See the table below for the loan portfolio breakdown as of December 31, 2018:

Loan Portfolio Composition			
Loan Category	Amount (\$000s)	Percent of Total Loans	Percent of Total Assets
Business	158,829	56.2	39.2
Agricultural	76,442	27.1	18.9
Home Mortgage	38,096	13.5	9.4
Consumer	4,715	1.7	1.2
Other	4,446	1.5	1.0
Total	\$ 282,528	100.0%	69.7%

FNB was rated “Satisfactory” in its previous CRA performance evaluation dated August 29, 2016. There are no legal, financial, or other factors impeding FNB’s ability to help meet the credit needs of its AAs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNB under the Intermediate Small Bank evaluation procedures, which include both a Lending Test and a CD test. The Lending Test evaluates the bank’s record of meeting the credit needs in the bank’s AAs. We utilized the bank’s loan register to identify loans originated from July 1, 2016, through December 31, 2018. The CD test evaluates the bank’s lending, investment, and service activities aimed at community development. The evaluation period for this review is August 30, 2016, through December 31, 2018.

The bank’s primary loan products were determined to be home mortgage and farm loans in the Illinois AA and home mortgage and business (non-farm) loans in the Indiana. We determined the primary loan products based on the number and dollar volume of lending over the review period and consideration of the bank’s business strategy. For the Illinois AA, farm loans represented 10.4 percent of the number and 38.9 percent of the dollar volume of loan originations for 2016 through 2018. Home mortgage loans represented 14.4 percent of the number and 19.3 percent of the dollar volume for the same period. For the Indiana, business loans represented 24.7 percent of the number and 60.6 percent of the dollar volume of loan originations. Home mortgage loans represented 11.6 percent of the number and 13.0 percent of the dollar volume of loan originations during the same timeframe. In both AAs, consumer loans represented a high percentage of the number of loan originations. However, given the low dollar volume and considering the bank’s business strategy, consumer loans were not determined to be a primary product.

Illinois			
2016 – 2018 Loan Originations			
Loan Category	Amount (\$000s)	% of # of Loans Originated	% of \$ of Loans Originated
Agricultural	70,447	10.4	38.9
Business	69,243	13.6	38.2
Home Mortgage	35,024	14.4	19.3
Consumer	6,714	61.6	3.6
Total	\$181,428	100.0%	100.0%

Indiana			
2016 – 2018 Loan Originations			
Loan Category	Amount (\$000s)	% of # of Loans Originated	% of \$ of Loans Originated
Business	234,576	24.7	60.6
Agricultural	98,493	9.5	25.5
Home Mortgage	50,357	11.6	13.0
Consumer	3,453	54.2	0.1
Total	\$386,879	100.0%	100.0%

We performed two separate analyses, one for 2016 loan originations and one for 2017 through 2018 originations. This is due to the changes instituted by the 2015 American Community Survey (ACS), which updated population and housing information. The ACS also resulted in changes to the income designations of some CTs. For 2016, we used the 2010 U.S. Census for comparison purposes. We used 2016 and 2018 Dun and Bradstreet (D&B) data for the business and farm loan analyses. FNB did not change its lending strategy during the two analysis periods.

Refer to the table in Appendix A for additional information.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) 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 Rating 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 ratings, and where applicable, multistate ratings. The 2017 through 2018 analysis period received more weight than the 2016 analysis period, as this represented the majority of the evaluation period. Farm loans and business loans received more weight than home mortgage loans when arriving at overall conclusions, given the number and dollar volume of lending during the evaluation period.

The state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each state rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 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 AA 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 Bureau of Consumer Financial Protection, 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.

State Rating

State of Illinois

CRA rating for the State of Illinois: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- CD lending, investments and services had a positive impact in the AA.
- A reasonable geographic distribution of loans.
- A reasonable distribution of loans to individuals of different income levels and farms of different sizes.

Description of Institution's Operations in Illinois

FNB has one AA within the state of Illinois. The IL non-MSA AA includes all CTs in Edwards, Wabash, and White Counties in southeastern Illinois. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income (LMI) geographies. There were no low-income CTs in the AA. There was one moderate-income CT in 2016 and two moderate-income CTs in 2017 and 2018. The 2015 ACS changed the income designation of one CT in the AA in 2017. Between 2016 and 2017, one CT was changed to moderate-income from middle-income. The CTs in Edwards and Wabash Counties were designated as underserved areas.

The bank operates a main office, three branches, and six ATMs in the state of Illinois. There were no branch openings or closings in the state during the evaluation period. The primary business focus for the state of Illinois is home mortgage and small farm loans.

The main office is in a moderate-income CT in the AA. Competition in the AA comes from seven FDIC-insured deposit institutions. As of June 30, 2018, FNB's deposits in the AA totaled \$240.5 million, which represented 27.7 percent of the market share. The bank's deposit market share ranked first out of eight FDIC-insured deposit institutions. The top three depository institutions accounted for 67.6 percent of total deposits in the AA. The depository institutions with the highest deposit market share were FNB, First National Bank of Allendale, and Citizens National Bank of Albion.

Competition for home mortgage loans in the bank's AA is strong.

- Based on 2016 Peer Mortgage Data, FNB ranked first out of 57 lenders in its AA. They originated 92 home mortgage loans, accounting for 24.1 percent of the market share by number of loans. The two lenders ranking below them were Peoples National Bank, with 15.2 percent, and First Mid-Illinois, with 7.3 percent.
- Based on 2017 Peer Mortgage Data, FNB ranked first out of 63 lenders in its AA. They originated 84 home mortgage loans, accounting for 18.6 percent of the market share by number of loans. Peoples National Bank and First Mid-Illinois continued to rank second and third, with 12.5 percent and 6.0 percent, respectively. The 2018 Peer Mortgage Data was not available at the time of this evaluation.

Competition for these small farm loans in the bank's AA is strong. Based on 2016 D&B data, farms in the AA totaled 245 and 98.7 percent were farms with gross annual revenues of \$1.0 million or less. Seven or 2.9 percent of small farms were in the moderate-income CT. Based on 2018 D&B data, farms in the AA totaled 228 and 98.7 percent were farms with gross annual revenues of \$1.0 million or less. Sixteen, or 7.0 percent, of small farms were in the moderate-income CTs.

According to the Bureau of Labor Statistics, unemployment in Edwards County was 5.8 percent, Wabash County was 5.0 percent, and White County was 5.0 percent in 2018. The state and national unemployment rates were 4.4 percent and 3.9 percent, respectively. Industries driving the local economy include agriculture and oil/gas production. The largest employers in the area include the Wabash County Hospital, Champion Laboratories, Inc., Martin and Bayley, Inc., and the local school districts. Many residents commute to the Evansville, Indiana area for employment.

Two new community contacts were performed for this evaluation. One contact was a community action organization and one was a government agency. The contacts noted local banks have been very involved in supporting small farms and financing first-time homebuyers. One contact noted a need for more banks to offer homebuyers access to mortgages with escrow in conjunction with the first-time homebuyer state of Illinois grants.

Refer to the community profiles for the state of Illinois below for detailed demographics and other performance context information for the AA that received a full-scope review.

Illinois non-MSA AA

2016

Table A – Demographic Information of the Assessment Area						
Assessment Area: IL non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	8.3	91.7	0.0	0.0
Population by Geography	33,333	0.0	7.8	92.2	0.0	0.0
Housing Units by Geography	16,141	0.0	8.0	92.0	0.0	0.0
Owner-Occupied Units by Geography	11,244	0.0	6.9	93.1	0.0	0.0
Occupied Rental Units by Geography	2,909	0.0	12.7	87.3	0.0	0.0
Vacant Units by Geography	1,988	0.0	7.2	92.8	0.0	0.0
Businesses by Geography	1,663	0.0	8.4	91.6	0.0	0.0
Farms by Geography	245	0.0	2.9	97.1	0.0	0.0
Family Distribution by Income Level	9,651	21.2	18.9	22.9	37.0	0.0
Household Distribution by Income Level	14,153	26.6	15.3	18.4	39.7	0.0
Median Family Income Non-MSAs - IL		\$54,499	Median Housing Value			\$68,111
			Median Gross Rent			\$467
			Families Below Poverty Level			9.2%

Source: 2010 U.S. Census and 2016 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.

2017-2018

Table A – Demographic Information of the Assessment Area						
Assessment Area: IL non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	16.7	83.3	0.0	0.0
Population by Geography	32,765	0.0	13.5	86.5	0.0	0.0
Housing Units by Geography	15,838	0.0	14.2	85.8	0.0	0.0
Owner-Occupied Units by Geography	10,534	0.0	13.5	86.5	0.0	0.0
Occupied Rental Units by Geography	3,293	0.0	16.1	83.9	0.0	0.0
Vacant Units by Geography	2,011	0.0	15.1	84.9	0.0	0.0
Businesses by Geography	1,624	0.0	16.5	83.5	0.0	0.0
Farms by Geography	228	0.0	7.0	93.0	0.0	0.0
Family Distribution by Income Level	9,086	19.3	19.0	22.8	38.9	0.0
Household Distribution by Income Level	13,827	25.1	15.9	18.0	41.0	0.0
Median Family Income Non-MSAs - IL		\$59,121	Median Housing Value			\$74,254
			Median Gross Rent			\$527
			Families Below Poverty Level			9.1%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Illinois

The bank has only one AA, the IL non-MSA. We performed a full-scope review of the bank's AA.

Refer to the table in Appendix A: Scope of Examination for additional information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

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

Based on a full-scope review, the bank's lending performance in the state of Illinois is reasonable.

- The geographic distribution of home mortgage loans and small loans to farms is reasonable.
- The borrower distribution of home mortgage loans and small farm loans is reasonable.
- We did not identify any conspicuous lending gaps.
- The bank's community development lending is adequate.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

Home Mortgage Loans

Overall, the geographic distribution of home mortgage loans is reasonable.

The geographic distribution of home mortgage loans in 2017-2018 was reasonable. The bank's percentage of loans in the moderate-income CT was below the percentage of owner-occupied housing units and above the aggregate lending in those geographies. The geographic distribution of home mortgage loans in 2016 was not inconsistent with the performance in 2017-2018.

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.

Small Loans to Farms

Overall, the geographic distribution of small farm loans is reasonable.

The geographic distribution of small loans to farms in 2017-2018 was reasonable. The bank's percentage of loans in the moderate-income CT was below the percentage of small farms (farms with gross annual revenues of \$1.0 million or less) and above the aggregate lending in those geographies. Based on the strong level of competition within the area for these loans, noted in the Description of Institution's Operations in Illinois section, this distribution is reasonable. The geographic distribution of small farm loans in 2016 was inconsistent with the performance in 2017-2018. The percentage of bank loans was above the percentage of small farms in the AA and aggregate lending.

Refer to Table S 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 farms.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Overall, the borrower distribution of home mortgage loans is reasonable.

The borrower distribution of home mortgage loans in 2017-2018 was reasonable. The distribution of the bank's lending to low-income borrowers was well below the percentage of low-income families but near to aggregate lending. The distribution of loans to moderate-income borrowers was above the percentage of moderate-income families in the AA and near to aggregate lending. The borrower distribution of home mortgage loans in 2016 was not inconsistent with the performance in 2017-2018.

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.

Small Loans to Farms

Overall, the geographic distribution of small farm loans is reasonable.

The borrower distribution of small loans to farms in 2017-2018 was reasonable. The distribution of the bank's lending to small farms was below the percentage of small farms but exceeded aggregate lending. Based on the strong level of competition within the area for small farm loans, noted in the Description of Institution's Operations in Illinois section, this distribution is reasonable. The borrower distribution of small farms loans in 2016 was not inconsistent with the performance in 2017-2018.

Refer to Table T 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 farms.

Responses to Complaints

During the evaluation period, FNB did not receive any complaints related to its performance in helping to meet the credit needs of its AA.

COMMUNITY DEVELOPMENT TEST

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

Based on a full-scope review, the bank exhibits adequate responsiveness to CD needs in the AA through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

Number and Amount of Community Development Loans

CD lending had a positive impact on lending performance in the AA. During the evaluation period, the bank originated eight qualified CD loans in the AA. The loans totaled \$4.2 million, or 11.3 percent of tier 1 capital. Of the eight qualified CD loans, six helped revitalize/stabilize moderate-income geographies (\$1.1 million) and two supported economic development (\$3.1 million). Two examples of CD loans that aided the community included providing working capital for an ambulance service and providing employment opportunities in LMI geographies and the underserved counties, Edwards and Wabash.

Refer to the Lending Activity table below for the facts 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.

Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
IL Non-MSA	0	0	8	4,200	8	100	4,200	100

Number and Amount of Qualified Investments

CD investments had a positive impact on investment performance in the AA. During the evaluation period, the bank made five investments in its AA totaling \$1.5 million. The obligations were for improvements to a local hospital located in an underserved area. The bank also received credit for eight prior period investments, still outstanding, totaling \$1.8 million. Seven of the investments financed the acquisition and installation of energy conservation measures and improvements to municipality buildings in underserved areas. The remaining prior period obligation financed federal and state mandated building requirements and improvements to the high school located adjacent to the moderate-income CT. In addition, FNB made 24 qualified donations totaling \$38,055. The investments and donations total \$3.4 million, or 9.1 percent of tier 1 capital.

Refer to the Investment Activity table below for the facts and data used to evaluate the bank's level of CD investments.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Illinois non-MSA	8	1,843	5	1,540	13	100	3,383	100	0	0

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

Extent to Which the Bank Provides Community Development Services

FNB provides an outstanding level of community development services. Within the AA, 17 employees were involved in CD services for 18 different organizations. Employees spent over 1,000 hours volunteering with these organizations. Of the services performed, 13 demonstrated leadership by serving on the board or committee of the organizations. Most of the activities were for organizations that provide services to LMI individuals, while some of the organizations promote economic development and revitalization/stabilization of LMI geographies and the underserved county.

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

State Rating

State of Indiana

CRA rating for the State of Indiana: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Excellent

The major factors that support this rating include:

- CD lending, services and investments had a significantly positive impact in the AAs.
- A reasonable geographic distribution of loans.
- A reasonable distribution of loans to businesses of different sizes, given the product lines offered by the bank.

Description of Institution's Operations in Indiana

FNB Carmi has two AAs within the state of Indiana rating area. The AAs include:

- Evansville, IN-KY MSA – 56 CTs in Vanderburgh and Posey Counties, representing two of the four counties in the MSA.
- IN non-MSA – all CTs in Gibson County.

Both Indiana AAs meet the requirements of the regulation and do not arbitrarily exclude LMI geographies. The Evansville, IN-KY MSA AA included 12 low-income CTs in 2016 and 18 in 2017 and 2018. The MSA had 30 moderate-income CTs in 2016 and 23 in 2017 and 2018. The 2015 ACS changed the income designation of 13 CTs in the AA in 2017. The IN non-MSA AA did not include low- or moderate-income CTs in 2016, 2017, and 2018.

The bank operates five branches and full-service ATMs in the state of Indiana. There were no branch openings in the state during the evaluation period. FNB closed a branch in the Evansville IN-KY MSA on February 10, 2017. The closure did not change the AA as two branch locations remained in Vanderburgh County. The primary business focus for the state of Indiana is home mortgage and business loans.

The bank has four branches located in the Evansville IN-KY MSA AA. Of the sixteen FDIC-insured depository institutions in this AA, the bank's deposit market share ranked eighth, per the June 2018 FDIC deposit market share data. As of June 30, 2018, FNB's deposits in the AA totaled \$92.1 million, which was 2.2 percent of the market. The top three depository institutions accounted for 76.7 percent of total deposits in the AA. The depository institutions with the highest deposit market share were Old National Bank, Fifth Third Bank, and German American Bank.

Evansville IN-KY MSA AA**2016**

Table A – Demographic Information of the Assessment Area						
Assessment Area: Evansville IN-KY MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	56	12.5	30.4	33.9	21.4	1.8
Population by Geography	205,613	6.4	28.1	34.9	30.7	0.0
Housing Units by Geography	93,777	7.8	30.9	34.2	27.1	0.0
Owner-Occupied Units by Geography	56,640	4.4	24.0	36.8	34.7	0.0
Occupied Rental Units by Geography	27,368	11.3	45.3	27.7	15.7	0.0
Vacant Units by Geography	9,769	17.2	30.9	37.5	14.4	0.0
Businesses by Geography	11,507	6.3	31.1	38.2	24.4	0.0
Farms by Geography	480	0.2	15.2	42.5	42.1	0.0
Family Distribution by Income Level	53,011	22.7	17.5	22.5	37.4	0.0
Household Distribution by Income Level	84,008	25.9	16.9	17.4	39.9	0.0
Median Family Income MSA - 21780 Evansville, IN-KY MSA		\$60,794	Median Housing Value			\$111,989
			Median Gross Rent			\$662
			Families Below Poverty Level			10.0%
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

2017-2018

Table A – Demographic Information of the Assessment Area						
Assessment Area: Evansville IN-KY MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	56	17.9	23.2	37.5	17.9	3.6
Population by Geography	206,872	12.3	22.5	38.8	26.2	0.3
Housing Units by Geography	94,630	13.4	24.7	38.6	23.0	0.4
Owner-Occupied Units by Geography	55,349	8.0	16.6	42.2	33.1	0.1
Occupied Rental Units by Geography	28,966	19.6	37.9	33.9	7.9	0.7
Vacant Units by Geography	10,315	24.8	30.8	32.8	10.9	0.7
Businesses by Geography	11,704	10.3	24.4	35.4	23.8	6.1
Farms by Geography	489	3.7	11.9	46.8	36.4	1.2
Family Distribution by Income Level	52,350	22.7	18.2	20.1	38.9	0.0
Household Distribution by Income Level	84,315	24.9	17.9	17.5	39.7	0.0
Median Family Income MSA - 21780 Evansville, IN-KY MSA		\$61,595	Median Housing Value			\$114,499
			Median Gross Rent			\$702
			Families Below Poverty Level			11.6%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Competition for home mortgage loans in the bank's AA is strong.

- Based on 2016 Peer Mortgage Data, FNB ranked 28th out of 207 lenders in its AA. The bank originated 57 home mortgage loans, accounting for 0.9 percent of the market share by number of loans. The top three lenders were Evansville Teachers Federal Credit Union, with 15.3 percent, Heritage Federal Credit Union, with 7.6 percent, and Old National Bank, with 5.9 percent.
- Based on 2017 Peer Mortgage Data, FNB ranked 28th out of 207 lenders in its AA. The bank originated 57 home mortgage loans, accounting for 0.9 percent of the market share by number of loans. The top three lenders were Evansville Teachers Federal Credit Union, with 15.3 percent, Heritage Federal Credit Union, with 7.6 percent, and Old National Bank, with 5.9 percent.
- The 2018 Peer Mortgage Data was not available at the time of this evaluation.

Businesses in the AA totaled 11,704 and are primarily small businesses (75.5 percent are businesses with gross annual revenues of \$1 million or less). D&B did not have revenue information for 15.8 percent of AA businesses. Of the businesses in the AA, a total of 1,211, or 10.4 percent are in the low-income CT and a total of 2,852 or 24.4 percent, are in the moderate-income CT. We reviewed Peer Small Business Data in the AA, which compares all CRA reporting banks that made small business loans in the AA.

- Based on 2016 Peer Small Business Data, there were 65 CRA loan reporting lenders in the AA. Those lenders originated 2,592 loans. The top three lenders were American Express, with 14.1 percent of loans, Old National Bank, with 13.6 percent of loans, and Citibank, with 8.6 percent of loans.

- Based on 2017 Peer Small Business Data, there were 59 CRA loan reporting lenders in the AA. Those lenders originated 2,897 loans. The top three lenders were Old National Bank, with 14.1 percent of loans, American Express, with 13.8 percent of loans, and German American Bank, with 10.3 percent of loans. The 2018 Peer Small Business Data was not available at the time of this evaluation.

According to the Bureau of Labor Statistics, unemployment in Gibson County was 2.5 percent, Posey County was 2.7 percent, and Vanderburgh County was 3.0 percent in December 2018. The state and national unemployment rates for the same period were 3.4 percent and 3.9 percent, respectively. Industries driving the local economy include manufacturing, health services and retail trade. The largest employers in the area are Toyota Motor Corporation, Deaconess Health Systems, St. Vincent Medical Center, University of Southern Indiana, SABIC, and the local school districts. Many residents commute from the surrounding counties to the Evansville, Indiana area for employment.

A new community contact to an affordable housing agency was performed for this evaluation. The contact noted local banks have been involved in supporting affordable housing and lending support, however not to the level of need. The contact recommended forming a collaborative group among the banking community to benefit affordable housing projects.

Refer to the community profiles for the state of Indiana above for detailed demographics and other performance context information for the Evansville, IN -KY MSA AA.

Scope of Evaluation in Indiana

The bank has two AAs, the IN Evansville IN-KY MSA and the IN non-MSA. We performed a full-scope review of the bank's Evansville IN- KY MSA AA. We performed a limited-scope review of the IN non-MSA AA. We placed more weight on the bank's performance for business loans, given the higher volume of loan originations in both number and dollar.

Refer to the table in Appendix A: Scope of Examination for additional information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

LENDING TEST

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

Based on a full-scope review, the bank's lending performance in the state of Indiana is reasonable. The geographic distribution of home mortgage loans and small loans to businesses is reasonable. The borrower distribution of home mortgage loans and small business loans is reasonable. We did not identify any conspicuous lending gaps. The bank's community development lending is adequate.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

Home Mortgage Loans

Overall, the geographic distribution of home mortgage loans is reasonable.

The geographic distribution of home mortgage loans in 2017-2018 was reasonable. The bank's percentage of loans in low-income CTs was above the percentage of owner-occupied housing units and aggregate lending in those geographies. The bank's percentage of loans in moderate-income CTs was below the percentage of owner-occupied housing units and aggregate lending in those geographies. Based on the strong level of competition within the area for home mortgage loans, noted in the Description of Institution's Operations in Indiana section, this distribution is reasonable. The geographic distribution of home mortgage loans in 2016 was inconsistent with the performance in 2017-2018. In 2016, the geographic distribution was poor. FNB's percentage of loans in low-income CTs was below the percentage of owner-occupied housing units and above aggregate lending in those geographies. The bank's percentage of loans in moderate-income CTs was well below the percentage of owner-occupied housing units and aggregate lending in those geographies.

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.

Small Loans to Businesses

Overall, the geographic distribution of small loans to businesses by income level of the geographies is reasonable.

The geographic distribution of small loans to businesses in 2017-2018 was reasonable. The bank's percentage of small loans to businesses in low-income CTs was below the percentage of businesses located in those geographies and aggregate lending. The percentage of loans in moderate-income CTs was above the percentage of businesses located in those geographies and aggregate lending. The geographic distribution of small loans to businesses in 2016 was inconsistent with the performance in 2017-2018. In 2016, the geographic distribution was excellent. The bank's percentage of small loans to businesses in low-income CTs was above the percentage of businesses located in those geographies and aggregate lending. The percentage of loans in moderate-income CTs was near to the percentage of businesses located in those geographies and aggregate lending.

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.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the banks. The bank exhibits an excellent distribution of loans to businesses of different sizes. The bank exhibits a poor distribution of loans to individuals of different income levels.

Home Mortgage Loans

Overall, the borrower distribution of home mortgage loans is poor.

The borrower distribution of home mortgage loans in 2017-2018 was poor. The distribution of the bank's lending to low-income borrowers was well-below the percentage of low-income families and aggregate lending. The distribution of loans to moderate-income borrowers was below the percentage of moderate-income families in the AA and below aggregate lending. The borrower distribution of home mortgage loans in 2016 was inconsistent with the performance in 2017-2018. In 2016, the borrower distribution was reasonable. The percentage of bank loans to low-income borrowers was well-below the percentage of low-income families and below aggregate lending. The distribution of loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and aggregate lending.

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.

Small Loans to Businesses

Overall, the bank's originations and purchased of loans to businesses of different sizes exhibits excellent distribution.

FNB's originations and purchases of small loans to businesses in 2017-2018 exhibits excellent distribution. The bank's percentage of loans in the moderate-income CT was below the percentage of small business (businesses with gross annual revenues of \$1.0 million or less) and well above the aggregate lending in those geographies. The geographic distribution of small business loans in 2016 was not inconsistent with the performance in 2017-2018.

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.

Responses to Complaints

During the evaluation period, FNB did not receive any complaints related to its performance in helping to meet the credit needs of its AA.

Conclusions for IN Non-MSA Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the IN non-MSA AA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Indiana is rated excellent.

Based on a full-scope review, the bank exhibits excellent responsiveness to CD needs in the MSA through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA(s).

Number and Amount of Community Development Loans

CD lending had a positive impact on lending performance in the AA. During the evaluation period, the bank originated 43 qualified CD loans in the AA. The loans totaled \$7.2 million, or 19.4 percent of tier 1 capital. Of the 43 qualified CD loans, 38 helped revitalize/stabilize LMI geographies (\$5.9 million), one was to an organization providing services to LMI individuals (\$250,000), two for affordable housing (\$491,000) and two supported economic development (\$600,000). Examples of CD loans included providing housing for at risk youth, increasing the supply of affordable multifamily housing in Evansville, and providing employment opportunities in LMI geographies.

Refer to the Lending Activity table below for the facts and data used to evaluate the bank's level of CD lending. This table include all CD loans, including multifamily loans that also qualify as CD loans.

Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$'s
Indiana MSA	0	0	43	7,240	43	100	7,240	100

Number and Amount of Qualified Investments

During the evaluation period, FNB purchased a \$1.1 million pool of FNMA mortgage-backed securities investment in its AA. The pool of loans backing the investment consists of mortgages providing affordable housing in LMI CTs or to LMI individuals in the Evansville MSA. In addition to this investment, FNB made 24 qualified donations totaling \$38,055. The investments and donations total \$1.1 million, or 2.9 percent of tier 1 capital.

Refer to the Investment Activity table below for the facts and data used to evaluate the bank's level of CD investments.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Indiana MSA	0	0	25	1,138	25	100	1,138	100	0	0

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

Extent to Which the Bank Provides Community Development Services

FNB provides an excellent level of CD services. Within the AA, 12 employees were involved in CD services for 12 different organizations. Employees spent over 400 hours volunteering with these organizations. Of the services performed, seven demonstrated leadership by serving on the board or committee of the organizations. Most of the activities were for organizations that provide services to LMI individuals, while some of the organizations promote affordable housing, economic development, and revitalization/stabilization of LMI geographies.

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

Conclusions for Indiana Non-MSA AA Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the Indiana Non-MSA AA is consistent with the bank's overall performance under the CD Test in the full-scope area(s).

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 MSA(s) and non-MSA(s) 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:	(07/01/2016 to 12/31/18)	
Bank Products Reviewed:	IL- Home Mortgage and Farms IN- Home Mortgage and Business Community development loans, qualified investments, community development services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Illinois		
IL non-MSA	Full-scope	Edwards, Wabash, and White Counties
State of Indiana		
Evansville IN-KY MSA	Full-scope	Vanderburgh and Posey Counties
IN non-MSA	Limited-scope	Gibson County

Appendix B: Summary of MMSA and State Ratings

RATINGS First National Bank of Carmi			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First National Bank of Carmi	Satisfactory	Satisfactory	Satisfactory
State:			
Illinois	Satisfactory	Satisfactory	Satisfactory
Indiana	Satisfactory	Excellent	Satisfactory

(* The Lending Test and Community Development Test carry equal weight 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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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.

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 are treated 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. The table also presents aggregate peer data for the years the data is available. 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.

ILLINOIS

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	
Carmi IL Non MSA	92	8,315	100.0	382	0.0	0.0	0.0	6.9	4.3	4.5	93.1	95.7	95.6	0.0	0.0	0.0	0.0	0.0	0.0	
Total	92	8,315	100.0	382	0.0	0.0	0.0	6.9	4.3	4.5	93.1	95.7	95.6	0.0	0.0	0.0	0.0	0.0	0.0	

Source: 2010 U.S. Census; 07/01/2016 - 12/31/2016 Bank Data, 2016 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																				2017-18
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	
Carmi IL No n MSA	134	11,343	100.0	399	0.0	0.0	0.0	13.5	12.7	8.3	86.5	87.3	91.7	0.0	0.0	0.0	0.0	0.0	0.0	
Total	134	11,343	100.0	399	0.0	0.0	0.0	13.5	12.7	8.3	86.5	87.3	91.7	0.0	0.0	0.0	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 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
Carmi IL Non MSA	92	8,315	100.0	382	21.2	6.5	7.6	18.9	20.7	22.0	22.9	28.3	25.7	37.0	34.8	29.6	0.0	9.8	15.2
Total	92	8,315	100.0	382	21.2	6.5	7.6	18.9	20.7	22.0	22.9	28.3	25.7	37.0	34.8	29.6	0.0	9.8	15.2

Source: 2010 U.S. Census ; 07/01/2016 - 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 2017-18

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
Carmi IL Non MSA	134	11,343	100.0	399	19.3	9.0	9.3	19.0	21.6	22.3	22.8	23.9	24.3	38.9	38.8	31.8	0.0	6.7	12.3
Total	134	11,343	100.0	399	19.3	9.0	9.3	19.0	21.6	22.3	22.8	23.9	24.3	38.9	38.8	31.8	0.0	6.7	12.3

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA 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
Carmi IL Non MSA	20	3,665	100.0	76	0.0	0.0	0.0	2.9	5.0	2.6	97.1	95.0	97.4	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	3,665	100.0	76	0.0	0.0	0.0	2.9	5.0	2.6	97.1	95.0	97.4	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2016 D&B Data; 07/01/2016 - 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 2017-18

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
Carmi IL Non MSA	20	4,009	100.0	104	0.0	0.0	0.0	7.0	5.0	1.0	93.0	95.0	99.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	4,009	100.0	104	0.0	0.0	0.0	7.0	5.0	1.0	93.0	95.0	99.0	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 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											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
Carmi IL Non MSA	20	3,665	100.0	76	98.4	75.0	55.3	0.8	20.0	0.8	5.0
Total	20	3,665	100.0	76	98.4	75.0	55.3	0.8	20.0	0.8	5.0

Source: 2016 D&B Data; 07/01/2016 - 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											2017-18
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
Carmi IL Non MSA	20	4,009	100.0	104	98.7	80.0	44.2	0.9	20.0	0.4	0.0
Total	20	4,009	100.0	104	98.7	80.0	44.2	0.9	20.0	0.4	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

INDIANA

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
Carmi IN MSA	64	7,513	100.0	7,372	4.4	3.1	1.7	24.0	7.8	21.0	36.8	45.3	34.6	34.7	43.8	42.7	0.0	0.0	0.0
Total	64	7,513	100.0	7,372	4.4	3.1	1.7	24.0	7.8	21.0	36.8	45.3	34.6	34.7	43.8	42.7	0.0	0.0	0.0

*Source: 2010 U.S. Census; 07/01/2016 - 12/31/2016 Bank Data, 2016 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																			2017-18
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
Carmi IN MSA	100	15,493	100.0	6,651	8.0	11.0	5.1	16.6	9.0	17.6	42.2	43.0	39.5	33.1	37.0	37.6	0.1	0.0	0.3
Total	100	15,493	100.0	6,651	8.0	11.0	5.1	16.6	9.0	17.6	42.2	43.0	39.5	33.1	37.0	37.6	0.1	0.0	0.3

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 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
Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Carmi IN MSA	64	7,513	100.0	7,372	22.7	6.3	9.4	17.5	26.6	21.6	22.5	17.2	20.0	37.4	39.1	28.8	0.0	10.9	20.2	
Total	64	7,513	100.0	7,372	22.7	6.3	9.4	17.5	26.6	21.6	22.5	17.2	20.0	37.4	39.1	28.8	0.0	10.9	20.2	

*Source: 2010 U.S. Census ; 07/01/2016 - 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																				2017-18
Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Carmi IN MSA	100	15,493	100.0	6,651	22.7	4.0	10.0	18.2	9.0	22.6	20.1	26.0	20.6	38.9	39.0	25.5	0.0	22.0	21.3	
Total	100	15,493	100.0	6,651	22.7	4.0	10.0	18.2	9.0	22.6	20.1	26.0	20.6	38.9	39.0	25.5	0.0	22.0	21.3	

*Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2017 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																			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	
Carmi IN MSA	20	3,126	100.0	2,578	6.3	15.0	6.4	31.1	30.0	30.7	38.2	35.0	36.4	24.4	10.0	26.5	0.0	10.0	0.0	
Total	20	3,126	100.0	2,578	6.3	15.0	6.4	31.1	30.0	30.7	38.2	35.0	36.4	24.4	10.0	26.5	0.0	10.0	0.0	

*Source: 2016 D&B Data; 07/01/2016 - 12/31/2016 Bank Data; 2016 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																			2017-18	
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	
Carmi I N MSA	20	2,709	100.0	2,874	10.3	5.0	10.4	24.4	35.0	25.9	35.4	35.0	31.9	23.8	15.0	26.0	6.1	10.0	5.7	
Total	20	2,709	100.0	2,874	10.3	5.0	10.4	24.4	35.0	25.9	35.4	35.0	31.9	23.8	15.0	26.0	6.1	10.0	5.7	

*Source: 2018 D&B Data; 01/01/2017 - 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												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	
Carmi IN MSA	20	3,126	100.0	2,578	75.7	65.0	39.8	8.8	35.0	15.5	0.0	
Total	20	3,126	100.0	2,578	75.7	65.0	39.8	8.8	35.0	15.5	0.0	
<i>Source: 2016 D&B Data; 07/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-18
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	
Carmi IN MSA	20	2,709	100.0	2,874	75.5	70.0	43.8	8.7	30.0	15.7	0.0	
Total	20	2,709	100.0	2,874	75.5	70.0	43.8	8.7	30.0	15.7	0.0	
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												