



## **PUBLIC DISCLOSURE**

November 04, 2013

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

First Financial Bank, National Association  
**Charter Number 56**

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Hamilton, OH 45011

Office of the Comptroller of the Currency

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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

## The Institution’s CRA Rating: Satisfactory

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

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

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

The major factors that support this rating include:

- The bank originated a majority of its loans inside its assessment areas.
- FFB’s lending activity is good.
- The bank’s geographic distribution of home mortgage loans is good and the geographic distribution of small loans to businesses is good.
- The distribution of home mortgage loans by income level of the borrower is good.
- The distribution of loans to businesses with different revenue sizes is adequate.
- FFB has an overall adequate level of qualified community development investments that are responsive to community needs.
- For the overall bank, service delivery systems are accessible to geographies and individuals of different income levels in the assessment areas (AA). In the state of Indiana, the bank’s branches were reasonably accessible. In the Columbus, IN MSA the bank’s branches were readily accessible to geographies and individuals of different income levels.
- Overall, community development services provided by the bank are adequate. In the state of Ohio, the bank provided a good level of services. The bank’s performance in the other rating areas was adequate.

## Definitions and Common Abbreviations

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

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

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

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

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

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

Activities that revitalize or stabilize-

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

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

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

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

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

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

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

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

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

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

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

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. In addition, the median income determined by the Department of Housing and Urban Development annually that is used to determine

the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

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

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

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

## Description of Institution

First Financial Bank (FFB) is an interstate financial institution headquartered in Hamilton, Ohio. FFB is a wholly owned subsidiary of First Financial Bancorp (FFBC), a \$6.7 billion bank holding company headquartered in Cincinnati, Ohio. FFB conducts business in the states of Indiana and Ohio, as well as the Cincinnati-Middletown-Northern Kentucky Multistate MSA (Cincinnati MMSA). As of December 31, 2011, FFB had total assets of \$6.7 billion, total loans of 3.9 billion, and Tier One Capital of \$524.4 million. Since the last CRA examination in May 2010, FFB's total assets remained stable at \$6.7 billion as of December 31, 2011.

FFB primarily engages in generating deposits and originating loans, with a focus on commercial real estate lending and residential real estate lending. FFB also offers consumer loans. According to the FDIC Deposit Market Share Report, dated June 30, 2011, FFB had deposits of \$5.0 billion. As of December 31, 2011, FFB had net loans of \$3.8 billion, representing 56.7 percent of total assets. As of December 31, 2011, approximately 79.3 percent of the bank's loan portfolio was comprised of real estate loans, of which commercial real estate and 1-4 family residential properties (51.5 percent and 34.7 percent, respectively) represented the predominant portion of the loan portfolio. Commercial and industrial loans made up 23.9 percent of the bank's total loan portfolio. Loans to individuals for household, family, and personal expenditures made up 1.8 percent of the total loan portfolio, and farm loans made up 0.4 percent of the portfolio.

As of December 31, 2011, FFB was a full-service bank with 90 full-service banking offices and 71 deposit taking Automated Teller Machines (ATMs) across its footprint. FFB offers a full range of loan and deposit products to businesses and individuals. They also offer alternative retail services including electronic banking services such as bill payment, mobile banking, and electronic statements; bank-by-mail and bank-by-phone programs; and direct deposits. FFBC operates several subsidiaries established for forming a tax-favored capital structure. FFB offers mortgage, investment, insurance, leasing, and equipment services through various wholly owned subsidiaries. The activities of these entities have no impact for the bank's capacity for community reinvestment in this evaluation period.

In September 2009, as part of the Irwin Union Bank & Trust and Irwin Union Bank FSB acquisition, FFB acquired banking centers in Indiana and Kentucky. The areas served by these banking centers were not included as part of the last CRA examination, but were included in this CRA evaluation. FFB did not retain banking centers in Nevada, Missouri, New Mexico, California, Utah, Michigan, and Arizona from the Irwin Union acquisition. Therefore, these areas are not included in this evaluation.

In September 2011, FFB expanded its operations in Ohio through an acquisition of banking centers in the state of Ohio from Liberty Savings Bank, FSB. The areas served by these banking centers were not included as part of this evaluation due to the short period between their acquisition and the beginning of this evaluation resulting in a low volume of transactions that would not allow for a meaningful analysis.

No legal, financial, or other factors impede the bank's ability to help meet the credit needs of its assessment areas during the evaluation period. The bank received a "Satisfactory" rating at the last CRA examination dated May 31, 2010.

# Scope of the Evaluation

## Evaluation Period/Products Evaluated

We analyzed home purchase, home improvement, and home refinance mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans made to businesses reported under the Community Reinvestment Act (CRA) for the period of January 1, 2010 through December 31, 2011. We did not evaluate multifamily loans separately, since the low volume did not allow for a meaningful analysis. However, we did consider multifamily loans meeting the community development (CD) definition as part of the evaluation of CD lending. Loan products that allowed for a meaningful analysis were those in which the bank originated more than 20 loans within the AA during the evaluation period. Performance tables one through 12 in appendix D include data covered by the 2000 Census. We reviewed community development loans, investments, and services for the period June 1, 2010 through December 31, 2011.

## Data Integrity

As part of our ongoing supervision of the bank, we tested the accuracy of the bank's 2010 and 2011 HMDA and CRA lending data. We also reviewed the appropriateness of community development activities provided for consideration in our evaluation. This included testing of CD loans, investments, and services for accuracy and to determine if they qualify as community development as defined in the CRA regulation. Our testing indicated no substantive inaccuracies in the data. Therefore, we concluded the data is reliable for the home mortgage loans, small loans to businesses, and CD activities.

## Selection of Areas for Full-Scope Review

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

## Ratings

The bank's overall rating is a blend of the multistate metropolitan area rating and state ratings. The Cincinnati MMSA carried the greatest weight in our conclusions due to this area representing the bank's most significant market in terms of deposit concentrations, branch distribution, and CRA reportable loans. At June 20, 2011, the Cincinnati MMSA represented 44.4 percent of total deposits, 46.7 percent of the branch network, and 43.0 percent of the CRA reportable loans during the evaluation period. We placed secondary emphasis on the state of Indiana, which represented 41.4 percent of total deposits, 35.6 percent of the branch network, and 38.6 percent of the CRA reportable loans during the evaluation period. We based the MMSA and state ratings primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

When evaluating the bank's performance under the lending test, we placed approximately equal weights on the bank's distribution of home mortgage loans and small business loans and a substantially higher value on these loan categories than on the distribution of small farm loans. Within the home mortgage loan category, greater weight was placed on home refinance loans than home purchase loans, due to home refinance loans representing a substantially higher number of loans during the evaluation period

than home purchase loans. We did not evaluate home improvement loans during the period, since the numbers of loans was equal to or less than 20 in all of the bank's AAs.

### **Inside/Outside Ratio**

This ratio is a bank-wide calculation, and not calculated by individual rating areas or AAs. Analysis is limited to bank originations and purchases, and does not include any affiliate data. For the evaluation period, FFB originated a majority of all loan products inside the bank's AAs (82.3 percent). The percentage in number of loans made inside the AAs by loan type are as follows: home refinance loans (80.0 percent), home purchase loans (83.9 percent), home improvement loans (95.0 percent), small loans to businesses (83.9 percent), and small loans to farms (85.5 percent).

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

Pursuant to 12 CFR 25.28(c), or 12 CFR 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

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

## **Multistate Metropolitan Area Rating**

### **Cincinnati-Middletown (OH-KY-IN) MMSA**

**CRA rating for the Cincinnati (OH-KY-IN) MMSA<sup>1</sup>: Satisfactory**

<b>The lending test is rated:</b>	<b>High Satisfactory</b>
<b>The investment test is rated:</b>	<b>Low Satisfactory</b>
<b>The service test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include:

- A good level of lending for home mortgage loans and small loans to businesses;
- An excellent geographic distribution of home purchase loans, an adequate distribution of home refinance loans, and an excellent distribution of small loans to businesses;
- An excellent borrower distribution of home mortgage loans, and an adequate borrower distribution of small loans to businesses;
- An adequate level of community development investments and donations that addressed the need for affordable housing and community services targeted to low- and moderate-income families;

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

- A branch distribution that was accessible to individuals living in low- and moderate-income geographies; and
- An adequate level of community development services that were responsive to community needs.

### **Description of Institution’s Operations in Cincinnati-Middletown (OH-KY-IN) Multistate Metropolitan MSA**

FFB had one AA within the Cincinnati-Middletown Multistate MSA (Cincinnati MMSA). The Cincinnati MMSA consists of 15 counties, although the bank only includes nine of these counties in its AA: Butler, Hamilton, and Warren (Ohio); Boone, Campbell, and Kenton (Kentucky); and Dearborn, Franklin, and Ohio (Indiana). These counties are contiguous and closely surround the city of Cincinnati, Ohio. FFB had 42 branches in the Cincinnati MMSA, representing 46.7 percent of the bank’s total branch network. During the assessment period, there were six branch closings, all of which were in upper or middle-income census tracts. There was one branch opening, which was in a moderate-income census tract. FFB had 40 deposit-taking ATMs in the Cincinnati MMSA; all of these ATMs were at branch locations.

As of June 30, 2011, bank deposits in the Cincinnati MMSA totaled \$2,854.2 million, ranking fourth with a 3.7 percent market share. Deposit competitors include U.S. Bank National Association ranking first with 35.8 percent of deposits, Fifth Third Bank ranking second with 30.5 percent of deposits, and PNC Bank, National Association with 9.3 percent of deposits. These three competitors together hold 75.6 percent of the market share.

The Cincinnati MMSA’s deposits accounted for approximately 43.7 percent of the bank’s total deposits. Refer to the market profile for the Cincinnati MMSA in appendix C for detailed demographics and other performance context information for this full-scope review area.

### **Scope of Evaluation in Cincinnati Multistate Assessment Area**

The Cincinnati MMSA was subject to a full-scope review. Based on 2000 census data, the AA had a 9.5 percent poverty rate and 10.0 percent of the families in the AA were living below the poverty level. These factors make it difficult for a low-income family to afford a home in this AA.

We did not perform an analysis of home improvement loans because the bank did not originate or purchase a sufficient number of loans to analyze. Refer to table 3 and 9 in the Cincinnati Multistate Metropolitan Area section of appendix D for the facts and data for geographic and borrower distributions of home improvement loans. We did not perform an analysis of the geographic and borrower distribution of loans to small farms because the bank did not originate or purchase a sufficient number of loans to perform a meaningful analysis. Refer to table 7 and 12 in the Cincinnati Multistate Metropolitan Area section of appendix D for the facts and data for geographic and borrower distributions of small loans to farms.

## **LENDING TEST**

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

The bank's performance under the lending test in the Cincinnati MMSA is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Cincinnati MMSA is good.

### **Lending Activity**

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

Lending activity in the Cincinnati MMSA is good, considering the strong competition for all types of loans in the marketplace. Intense competition by megabank lenders is a mitigating factor for the rating.

In the Cincinnati MMSA, FFB has a deposit market share of 3.7 percent and ranked 4th among 64 depository institutions. For small loans to businesses, FFB ranked sixth among 94 lenders with a 2.6 percent market share. Five of the large banks ahead of FFB dominated the market with a combined market share of 40.7 percent. Individual market shares of these banks ranged from 3.8 percent to 15.5 percent. For home purchase lending there are 536 lenders in the AA reflecting strong competition. FFB ranked 87th in home purchase lending with 0.1 percent market share, and 22nd in home refinance lending with 0.8 percent market share. There are 380 lenders that made home refinance loans in the AA.

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

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

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

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

The overall geographic distribution of home purchase loans is excellent. The percentage of loans in both low- and moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank's market share in low- and moderate-income census tracts exceeds its overall market share for home purchase loans.

The overall geographic distribution of home refinance loans is adequate. The percentage of loans in both low- and moderate-income geographies was below the percentage of owner-occupied units in these geographies. An analysis of market share performance was not meaningful due to the overall market share being less than one percent.

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

Overall, the geographic distribution of small loans to businesses is excellent.

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

The overall geographic distribution of small loans to businesses is excellent. The percentage of loans in low-income geographies was below the percentage of small businesses in these geographies and was good. The distribution of small businesses in low-income geographies was only 4.9 percent, limiting opportunities to lend in these geographies. The percentage of loans in moderate-income geographies exceeded the percentage of small businesses in these geographies. The bank's market share in low-income geographies was below its overall market share of loans to small businesses. The bank's market share in moderate-income geographies exceeded the bank's overall market share.

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

We reviewed summary reports and maps and analyzed FFB's home mortgage, small business, and small farm lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. All of the bank's AAs consist of whole geographies, meet the requirements of the CRA regulation, and do not arbitrarily exclude any low- or moderate-income areas.

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

The overall borrower distribution of the bank's lending is good.

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

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

The overall borrower distribution of home purchase loans is excellent. The ratio of home purchase loans to low-income and moderate-income borrowers significantly exceeded the percentages of low-income and moderate-income families and was excellent. The bank's market share to low-income borrowers exceeded the bank's overall market share and was excellent. The bank's market share to moderate-income borrowers was near the bank's overall market share and was good.

The overall borrower distribution of refinance loans is good. The ratio of refinance loans to low-income borrowers was below the percentages of low-income families but was adequate. The ratio of home refinance loans to moderate-income borrowers exceeded the percentages of moderate-income families and was excellent. The bank's market share to low- and moderate-income borrowers exceeded the bank's overall market share.

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

The overall borrower distribution of small loans to businesses is adequate.

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

The overall borrower distribution of small loans to businesses is adequate. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was below the percentage of small businesses. However, the bank has significant competition from megabanks, such as PNC and U.S. Bank, as well as other large regional banks, such as Fifth Third Bank, Ohio. The bank's market share to businesses with revenue of \$1 million or less was near its overall market share, which was 2.6 percent.

### **Community Development (CD) Lending**

Refer to table 1 Lending Volume in the "Cincinnati Multistate Metropolitan Area" section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. However, table 5 does not separately list community development loans.

FFB's level of CD lending had a neutral impact in its overall lending performance in the Cincinnati MMSA. FFB originated 12 qualified CD loans in the AA totaling \$14.7 million.

### **Product Innovation and Flexibility**

FFB offers a standard product mix of loans including FHA, VA, and SBA loans. FFB did not offer any other innovative or flexible loan products in the Cincinnati MMSA.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in the Cincinnati MMSA is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Cincinnati MMSA is adequate.

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

During the evaluation period, FFB made 29 investments in the Cincinnati MMSA totaling \$5.5 million. This represents approximately 2.0 percent of allocated Tier 1 Capital for the AA, which is an adequate level of investments.

The bank's responsiveness to the community development needs in the AA is adequate. In terms of total dollar amount, the bank made 71.0 percent of its donations to organizations focused on affordable housing. This included \$2.3 million in qualified mortgage-backed securities, where the underlying mortgages were to low- and moderate-income (LMI) borrowers. It also included a \$527 thousand investment to Access Capital for affordable housing purposes and two small donations to organizations with a focus on affordable housing. The bank made a \$791 thousand investment in OH Butler Behavioral and \$320 thousand in several donations to support organizations focused on community service. The remaining investments and donations included a \$200 thousand investment in Catalytic Development Fund of NKY, and two donations totaling \$35 thousand for the benefit of economic development in the AA.

Funding for affordable housing and community services targeted to LMI individuals were the main identified CD needs in the AA. There are numerous nonprofit organizations located in the AA. These organizations provide affordable housing, community services to LMI families, and support for economic development activities.

## **SERVICE TEST**

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

The bank's performance under the service test in the Cincinnati MMSA is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Cincinnati MMSA is good.

### **Retail Banking Services**

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

FFB's branch distribution in the Cincinnati MMSA is good. Branches were accessible to geographies and individuals of different income levels in the AA. Access to services in low-income geographies is poor. The percentage of branches in low-income geographies was below the percentage of the population in low-income geographies. There was one branch located in a low-income geography. Access to services in moderate-income geographies was excellent. The percentage of branches in moderate-income geographies exceeded the percentage of the population in moderate-income geographies. There were 11 branches located in moderate-income geographies.

Branch openings and closings improved the accessibility of the bank's delivery systems, particularly to LMI geographies or individuals. During the evaluation period, the bank closed one branch in an upper-income geography and five branches in middle-income geographies. These closures were due to consolidation in the bank's branch activities. The bank opened one branch in moderate-income geography. FFB's branch services and hours in the AA were adequate and did not vary in a way that would inconvenience portions of the AA, particularly LMI individuals.

Bank-wide, management complements its traditional service delivery methods with certain alternative delivery processes, such as online banking, which includes bill payment and mobile banking; automated teller machines; bank-by-mail, and bank-by-phone programs. However, we placed no significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping to meet the credit needs of low- and moderate-income geographies or LMI individuals.

### **Community Development Services**

FFB provides an adequate level of community development services. In the Cincinnati MMSA, 29 employees provided their expertise to 27 different community development organizations. Twelve bank employees served as either board or committee members of eleven different local community development organizations, including an affordable housing corporation, child welfare organizations, and an organization that promotes financial literacy. Three bank employees volunteered to assist four community development organizations by providing loan review assistance. In addition, twenty-six

employees participated with six organizations by teaching financial literacy classes. These classes were presented to 393 students, the majority of whom were from low- or moderate-income families.

## State of Indiana

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

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

**The investment test is rated: Outstanding**

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

The major factors that support this rating include:

- A good level of lending for home mortgage loans and small loans to businesses;
- Overall good geographic distribution as shown by an excellent geographic distribution of loans to small businesses, an adequate distribution of home mortgage loans, and a poor distribution of loans to small farms;
- A good borrower distribution of home mortgage loans and small loans to farms and an adequate distribution of loans to small businesses;
- An excellent level of community development investments and donations that addressed the need for affordable housing and community services targeted to low- and moderate-income families;
- A branch distribution that was reasonably accessible to individuals living in low- and moderate-income geographies; and
- An adequate level of community development services that were responsive to community needs.

### **Description of Institution's Operations in Indiana**

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

FFB had six AAs within the state of Indiana. These AAs included the Bloomington MSA, Columbus MSA, Lafayette MSA, Gary partial MD (Lake County), Indianapolis MSA, and Indiana non-MSA, which is comprised of Blackford, Decatur, Fayette, Jackson, Jay, Jennings, Randolph, Rush, Clinton, Fulton, and Wabash counties.

FFB provides a full range of loan and deposit products to all AAs. FFB had 32 branches within the state representing 35.6 percent of the bank's total branch network. There were two branch openings and six branch closings in the state during the evaluation period. FFB had 20 deposit-taking ATMs. As of June 30, 2011, the bank ranked 12th in the AA in deposits, representing a 2.2 percent market share. FFB's statewide deposits totaled \$2.2 billion. The Columbus MSA is the bank's most significant AA in the state, accounting for 27.5 percent of total bank deposits. Therefore, we selected the Columbus MSA for a full-scope review.

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<sup>2</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

## Columbus MSA

The Columbus, IN MSA consists of all geographies within Bartholomew County. The banking industry is highly competitive in the AA and includes branches of national, regional, and community banks. As of June 30, 2011, the bank ranked first in the AA in deposits, representing a 47.7 percent market share. The five largest competitors in the AA include Indiana Bank and Trust Company, Salin Bank and Trust Company, MainSource Bank, PNC National Association, and Jackson County Bank.

Refer to the market profiles for the state of Indiana in appendix C for detailed demographics and other performance context information for this assessment area that received a full-scope review.

### **Scope of Evaluation in Indiana**

For the state of Indiana, we completed a full-scope review of the Columbus IN, MSA. We performed limited-scope reviews for the Bloomington MSA, Indianapolis MSA, Lafayette MSA, Gary, IN partial MD (Lake County), and Indiana Non-MSA AAs. We performed a full-scope review of the Columbus, IN MSA because it had the highest percentage of deposits (27.5) relative to the other AAs and we did not choose the AA for a full-scope review at the prior CRA performance evaluation. Gary, IN partial MD had 26.6 percent of deposits relative to the other AAs and carried greater weight than other limited scope areas in evaluating performance.

The Columbus MSA has no low-income geographies. Therefore, our analysis for the lending test was limited to performance in moderate-income geographies. We did not perform an analysis of home improvement loans because the bank did not originate or purchase a sufficient number of loans to analyze. We did not perform an analysis of the overall borrower distribution of small loans to farms for the Columbus MSA, the Bloomington MSA, the Indianapolis MSA, and the Gary, IN partial MD because the bank did not originate or purchase a sufficient number of small loans to farms within these AAs during the assessment period. Refer to the table in appendix A for more information on the Indiana assessment areas.

## **LENDING TEST**

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

The bank's performance under the lending test in Indiana is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Columbus MSA is good.

### **Lending Activity**

The bank's overall lending activity in the state of Indiana is good. Based on a full-scope review, the bank's performance in the Columbus MSA is good. The good performance in home mortgage lending and excellent performance in small business lending supports this conclusion when compared to its local competitors.

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

FFB's lending activity in the Columbus MSA is good. Based upon FDIC Deposit Market Share data as of June 30, 2011, FFB achieved a 47.7 percent market share of deposits, ranking first among nine financial institutions in the AA. Based upon 2011 Peer Data, the bank achieved a 2.8 percent market share of home purchase loans, ranking 11<sup>th</sup> among 85 reporting lenders and achieved a 3.8 percent market share of refinance loans, ranking 8<sup>th</sup> among 104 reporting lenders. These market share rankings are good when compared to the deposit market share of the competition within the AA. FFB achieved a 15.2 percent market share of small loans to businesses, ranking first among 36 reporting lenders. FFB achieved a 21.6 percent market share of small loans to farms, ranking second among 10 reporting lenders. These market ranks and shares are excellent.

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

Overall, the geographic distribution of the bank's lending is good.

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

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

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

The overall geographic distribution of home purchase loans is good. The ratio of loans made in moderate-income geographies is near the percentage of owner-occupied units in these geographies, reflecting good performance. The bank's market share in moderate-income census tracts is significantly below its overall market share for home purchase loans and is poor.

The overall geographic distribution of home refinance loans is adequate. The ratio of loans made in moderate-income census tracts is significantly below the percentage of owner-occupied units in these geographies, reflecting poor performance. However, the bank's market share in moderate-income census tracts exceeds its overall market share for home refinance loans and is excellent.

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

Overall, the geographic distribution of small loans to businesses is excellent.

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

The overall geographic distribution of small loans to businesses is excellent. The portion of loans made in moderate-income geographies exceeds the distribution of businesses in those geographies, and is excellent. The bank's market share in moderate-income geographies exceeds its overall market share for loans to small businesses.

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

Overall, the geographic distribution of small loans to farms is poor based solely on the analysis of limited scope areas.

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

We did not perform an analysis for the overall geographic distribution of small loans to farms for the Columbus MSA because the bank did not originate or purchase a sufficient number of small loans to farms for a meaningful analysis.

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

We reviewed summary reports and maps, and analyzed FFB's home mortgage, small business, and small farm lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. The bank's AAs consist of whole geographies, meet the requirements of the CRA regulation, and do not arbitrarily exclude any low- or moderate-income areas.

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

The overall borrower distribution of the bank's lending is good.

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

The overall borrower distribution of home mortgage loans is good. We did not perform an analysis of home improvement loans because the bank did not originate or purchase a sufficient number of loans to analyze.

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

The overall borrower distribution of home purchase loans is excellent. The percentage of loans to low-income borrowers exceeded the percentage of low-income families in the AA. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. The bank's market share for home purchase loans to low-income borrowers exceeded its overall market share of home purchase loans. The bank's market share for home purchase loans to moderate-income borrowers was below its overall market share of home purchase loans, and is adequate.

The overall borrower distribution of home refinance loans is good. The percentage of loans to low-income borrowers was significantly below the percentage of low-income families and is poor. The percentage of loans to moderate-income borrowers was near the percentage of moderate-income families, and is good. The bank's market share of loans to low- and moderate-income borrowers exceeded its overall market share of refinance loans, and is excellent.

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

The overall borrower distribution of small loans to businesses is adequate.

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

The overall borrower distribution of small loans to businesses is adequate. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was below the percentage of small businesses in the AA, and is poor. The bank's market share of loans to small businesses is near its overall market share of loans to small businesses and is good. In evaluating the bank's performance, we considered the competitive market in which the bank operates regarding small business lending.

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

The overall borrower distribution of small loans to farms is good.

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

We did not perform an analysis of the overall borrower distribution of small loans to farms for the Columbus MSA, because the bank did not originate or purchase a sufficient number of small loans to farms within the AA during the assessment period.

### **Community Development Lending**

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

FFB's level of CD lending had a neutral impact on its overall lending performance in the state. During the evaluation period, FFB originated \$5.6 million in eleven CD loans.

FFB's level of CD lending had a neutral impact on the overall evaluation of its lending performance in the Columbus, IN MSA. During the evaluation period, FFB originated four qualified CD loans, totaling \$465 thousand.

### **Product Innovation and Flexibility**

FFB offers a standard product mix of loans including FHA, VA, and SBA loans. FFB did not offer any other innovative or flexible loan products in the Columbus, IN MSA.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Bloomington MSA, Lafayette MSA, and Indianapolis MSA is consistent with the bank's overall "High Satisfactory" performance under the lending test in Indiana. In the IN-non MSA and Gary, IN partial MD, the bank's performance is weaker than the bank's overall performance in the state due to weaker home mortgage geographic and borrower distribution, and to weaker small business distribution. The weaker performance had no impact on the lending test rating.

As previously mentioned, an analysis of the overall borrower distribution of small loans to farms was not performed for the Columbus MSA, the Bloomington MSA, the Indianapolis MSA, and the Gary, IN partial MD because the bank did not originate or purchase a sufficient number of small loans to farms within these AAs during the assessment period. The borrower distribution of small loans to farms in the

IN-non MSA and Lafayette MSA was good. The good performance had no impact on the lending test rating. Refer to tables 1 through 12 in the state of Indiana section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Columbus, IN MSA AA is excellent.

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

During the evaluation period, FFB made eight investments in the Columbus MSA totaling \$3.5 million. This represents approximately 5.8% of allocated Tier 1 Capital for the AA.

The bank was responsive to the identified community development needs of affordable housing and community services targeted to LMI individuals. The bank made 97 percent of its investments and donations to organizations focused on affordable housing. This includes a significant prior period investment of about \$3 million for Arbors of Princeton Park Apartments, a Low Income Housing Tax Credit project located in the MSA. The bank also made a \$325 thousand prior period investment and a \$93 thousand current period investment in the AA for affordable housing. The bank donated 100 percent of approximately \$14 thousand to organizations focused on community services.

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

Based on limited scope reviews, the bank's performance under the investment test in the IN non-MSA, Indianapolis MSA, and Lafayette MSA was consistent with the overall "Outstanding" Performance under the investment test in Indiana. The bank's performance under the investment test in the Bloomington and Gary AAs was weaker than the bank's overall performance in the state, due to a lower level of investments. The combined performance in the limited-scope AAs was not significant enough to affect overall conclusions in the state. Refer to table 12 in appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

The bank's performance under the service test in Indiana is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Columbus, Indiana MSA is outstanding.

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

FFB's branch distribution in the Columbus MSA is excellent. Branches were readily accessible to geographies and individuals of different income levels. There were no low-income CT's in the AA. Access to branches in moderate-income geographies was excellent. The percentage of branches in moderate-income geographies exceeded the percentage of the population in moderate-income geographies. There were five branches in the AA, and two of the branches were in moderate-income CTs. There were also six deposit-taking ATMs in the AA, with two located in moderate-income census tracts.

Branch openings and closings in the Columbus MSA did not adversely affect the overall accessibility of the bank's delivery systems to low-and moderate-income geographies. During the evaluation period, the bank closed one branch, which was located in a middle-income geography. Branch hours and services did not vary in a way that would inconvenience portions of the AA, particularly LMI individuals.

### **Retail Banking Services**

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

FFB's branch distribution in the Columbus MSA is excellent. Branches were readily accessible to geographies and individuals of different income levels. There were no low-income CT's in the AA. Access to branches in moderate-income geographies was excellent. The percentage of branches in moderate-income geographies exceeded the percentage of the population in moderate-income geographies. There were five branches in the AA, and two of the branches were in moderate-income CTs. There were also six deposit-taking ATMs in the AA, with two located in moderate-income census tracts.

Branch openings and closings in the Columbus MSA did not adversely affect the overall accessibility of the bank's delivery systems to low-and moderate-income geographies. During the evaluation period, the bank closed one branch, which was located in a middle-income geography. Branch hours and services did not vary in a way that would inconvenience portions of the AA, particularly LMI individuals.

### **Community Development Services**

FFB's performance in providing community development services in the Columbus MSA was excellent. In the Columbus MSA, seven employees provided their expertise to eight different community development organizations. FFB employees demonstrated leadership and served on twenty-six Board of Directors or committee memberships of these organizations. FFB generally participates annually in Indiana's Money Smart Week service, with the exception of 2011. During Money Smart Week, the bank provided financial literacy training to 430 attendees in 2010, 348 attendees in 2012, and 938 attendees in 2013.

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

Based on limited-scope reviews, the bank's performance under the service test in the Indianapolis MSA is consistent with the bank's overall "Low Satisfactory" performance under the service test in Indiana. Performance in the Bloomington MSA and the Indiana Non-MSA areas are stronger than the bank's overall performance under the service test in Indiana and are outstanding and good, respectively. Performance differences were based on stronger branch distribution.

The bank's performance under the service test in the Lafayette MSA, and the Gary, IN partial MD limited scope areas is weaker than the bank's overall performance in the state and is poor and very poor, respectively. Performance differences in these limited scope MSAs were based on weaker branch distribution. The effect of the Lafayette MSA and Gary, IN partial MD limited scope areas on the overall service test rating was significant. Refer to table 15 in the Indiana section of appendix D for the facts and data that support these conclusions.

## State of Ohio

**CRA Rating for the state of Ohio<sup>3</sup>: 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:

- A good level of lending for home mortgage loans, small loans to businesses, and farms;
- An excellent geographic distribution of loans to home mortgages and small businesses, and an adequate distribution of loans to small farms;
- An excellent borrower distribution of home mortgage loans, an adequate borrower distribution of loans to small businesses, and a poor borrower distribution of loans to small farms;
- A good level of qualifying investments, grants, and donations that were responsive to community needs;
- A branch distribution that was accessible to individuals living in low- and moderate-income geographies; and
- A good level of community development services that were responsive to community needs.

### Description of Institution's Operations in Ohio

FFB had three AAs within the state of Ohio. These AAs included the Lima MSA comprised of Allen County; the Ohio non-MSA comprised of Auglaize, Mercer, Paulding, Sandusky, Van Wert, and Williams counties; and the Dayton MSA comprised of Preble, Montgomery, and Greene counties.

FFB provides a full range of loan and deposit products to all AAs. FFB had 16 branches within the state, representing 17.8 percent of the bank's total branch network. There were no branch openings or closings in the state during the evaluation period. FFB had 15 deposit-taking ATMs. As of June 30, 2011, the bank ranked 12<sup>th</sup> of 263 financial institutions in the AA in deposits representing a 1.2 percent market share. FFB's statewide deposits totaled \$718.8 million. The Ohio non-MSA area is the bank's most significant AA in the state, accounting for 78.6 percent of total bank deposits.

#### Ohio Non-MSA

The banking industry is highly competitive in the AA and includes branches of national, regional and community banks. As of June 30, 2011, FFB ranked first in the AA in deposits, representing a 14.8 percent market share. The five largest competitors in the AA include The Peoples Bank Co., The Croghan Colonial Bank, Minster Bank, The Huntington National Bank, and First Federal Bank of the Midwest.

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<sup>3</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

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

### **Scope of Evaluation in Ohio**

For the state of Ohio, we completed a full-scope review of the Ohio non-MSA areas. The Lima MSA and Dayton MSA areas received limited-scope reviews. The Ohio non-MSA areas received a full-scope review due to the high percentage of deposits (78.6 percent) and branches (68.8 percent) in these areas. We did not perform an analysis of home improvement loans because the bank did not originate or purchase a sufficient number of loans to analyze. We did not perform an analysis of the geographic distribution of small loans to farms for the Dayton MSA and Lima MSA limited scope AAs because the bank did not originate or purchase a sufficient number of small loans to farms within these AAs during the assessment period to perform a meaningful analysis. There are no low-income census tracts in the Ohio AA. Therefore, we based our analysis for the lending test solely on performance in moderate-income tracts. Refer to appendix A for more information on the Ohio AA.

## **LENDING TEST**

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

The bank's performance under the lending test in the state of Ohio is "High Satisfactory." Based on the full-scope review, the bank's performance in the OH non-MSA area is good.

### **Lending Activity**

FFB's overall lending activity in the state of Ohio is good, considering the strong competition in the bank's AAs. The bank's good performance in originating home mortgage loans and small business loans when compared to its local competitors supports this conclusion.

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

FFB's lending activity in the OH Non-MSA AA is good. Based upon FDIC Deposit Market Share data as of June 30, 2011, FFB achieved a 14.8 percent market share of deposits, ranking first among 31 financial institutions in the AA. Based upon 2011 Peer Data, FFB achieved a 2.7 percent market share for the number of home purchase loans originated ranking 13th among 111 reporting institutions. The bank achieved a 2.5 percent market share for the number of home refinance loans, ranking 14th among 136 reporting lenders. FFB's market share for home purchase loans is adequate and for home refinance loans is good, considering that, large regional financial institutions and two local credit unions originate a large majority of the home mortgage loans in the AA.

FFB achieved a 3.9 percent market share of small loans to businesses, ranking 10<sup>th</sup> among 44 reporting lenders in the OH non-MSA AA, indicating good performance. FFB achieved a 4.3 percent market share of small loans to farms, ranking eighth among 20 reporting lenders.

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

Overall, the geographic distribution of the bank's lending is good. In performing our analysis, we placed approximately equal weight on the bank's home mortgage lending and loans to businesses and less weight on loans to farms, since home mortgage lending and loans to businesses equally represented the vast majority of the bank's CRA reportable lending activity

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

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

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

The overall geographic distribution of home purchase loans is excellent. The portion of loans made in moderate-income geographies was significantly above the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income census tracts was above its overall market share for home purchase loans.

The overall geographic distribution of home refinance loans is good. The portion of loans made in moderate-income census tracts was near the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income census tracts was below its overall market share for home refinance loans.

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

Overall, the geographic distribution of small loans to businesses is excellent.

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

The geographic distribution of small loans to businesses is excellent. The portion of loans made in moderate-income geographies substantially exceeds the distribution of businesses in those geographies. The bank's market share in moderate-income geographies was above its overall market share for small loans to businesses.

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

Overall, the geographic distribution of small loans to farms is adequate.

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

The overall geographic distribution of small loans to farms is adequate. The bank did not achieve a market share in moderate-income tracts. The bank had limited lending opportunities to lend in moderate-income tracts, since only 0.2 percent of farms were located in moderate-income geographies.

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

We reviewed summary reports and maps, and analyzed FFB's home mortgage, small business, and small farm lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained, conspicuous gaps. The bank's AAs consist of whole geographies, meet the requirements of the CRA regulation, and do not arbitrarily exclude any low- or moderate-income areas.

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

The overall borrower distribution of the bank's lending is good. As noted previously, we placed approximately equal weight on the bank's home mortgage lending and loans to businesses and less weight on loans to farms, since home mortgage lending and loans to businesses equally represented the vast majority of the bank's CRA reportable lending activity.

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

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

The overall borrower distribution of home mortgage loans is excellent. In evaluating the borrower distribution of home loans in the OH non-MSA AA, it is important to note that approximately 7.0 percent of the families are below the poverty level, making it more difficult to originate home mortgage loans to low- and moderate-income individuals.

The overall borrower distribution of home purchase loans is excellent. The percentage of loans to low-income borrowers was well above the percentage of low-income families. The percentage of loans made to moderate-income borrowers also exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers was above its overall market share of home purchase loans. The bank's market share of loans to moderate-income borrowers was slightly below its overall market share of home purchase loans.

The overall borrower distribution of home refinance loans is excellent. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers was near the percentage of moderate-income families. The bank's market share of loans to low-income borrowers exceeded its overall market share of refinance loans. The bank's market share of loans to moderate-income borrowers substantially exceeded its overall market share of refinance loans.

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

The overall borrower distribution of small loans to businesses is poor.

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

The overall borrower distribution of small loans to businesses is poor. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was below the percentage

of small businesses. The bank's market share of loans to small businesses was near its overall market share of loans to small businesses.

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

The overall borrower distribution of small loans to farms is adequate.

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

The overall borrower distribution of small loans to farms was adequate. The bank's borrower distribution of small loans to small farms (farms with gross annual revenue of \$1 million or less) was slightly below the percentage of small farms. The bank's market share of loans to small farms was below its overall market share of loans to small farms.

### **Community Development Lending**

FFB's level of CD lending had a neutral impact on its overall lending performance in the state. During the evaluation period, FFB originated \$10.6 million in six CD loans.

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

FFB's level of CD lending had a neutral impact on the overall evaluation of its lending performance in the Columbus, IN MSA. During the evaluation period, FFB originated two qualified CD loans, totaling \$5.8 million.

### **Product Innovation and Flexibility**

FFB offers a standard product mix of loans including FHA, VA, and SBA loans. FFB did not offer any other innovative or flexible loan products in the Ohio non-MSA AA.

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

Based on limited scope reviews, the bank's performance under the lending test in the Dayton MSA and Lima MSA AAs is consistent with the bank's overall "High Satisfactory" performance under the lending test in Ohio. Refer to tables 1 through 12 in the state of Ohio section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Ohio is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the OH non-MSA AA is poor.

Refer to table 14 in the Ohio non-MSA section of appendix D for the facts and data used to evaluate the bank's levels of qualified investments.

During the evaluation period, FFB made two investments in the OH non-MSA AA totaling \$819 thousand. This represents approximately 1.4 percent of allocated Tier 1 Capital for the AA. The bank's responsiveness to the community development needs in the AA is adequate. In terms of total dollar amount, the bank made 99.0 percent of its investments and donations to organizations focused on affordable housing. The bank purchased an \$818 thousand pool of mortgage-backed securities, which consist of mortgages to LMI individuals. The remaining investments and donations included a \$1,000 donation to Western Ohio Educational Foundation to provide scholarships to LMI for community services purposes.

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

Based on limited-scope reviews, the bank's performance under the investment test in the Dayton MSA and the Lima MSA AAs was stronger than the overall "High Satisfactory" performance in the state and was excellent. The combined performance in the limited scope AAs was significant enough to affect the overall conclusions in the state. Refer to table 14 in appendix D for the facts and data that support these conclusions.

### **Broader Regional Area**

In addition to investments in the Dayton MSA, Lima MSA, and the OH Non-MSA AA, the bank made an investment in the state of Ohio broader regional area. FFB invested \$3 million dollar in North Creek Small Business Investment Company, which provides funding to small businesses through mezzanine and senior debt investments in lower and middle-market companies. Performance in the state of Ohio broader regional area was significant enough to affect the overall conclusions in the state.

## **SERVICE TEST**

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

The bank's performance under the service test in Ohio is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Ohio Non-MSA is good.

### **Retail Banking Services**

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

FFB's overall branch distribution in the Ohio Non-MSA is good. There are no branches located in low-income or moderate-income CTs; however, there are no low CTs and only one moderate CT in the AA. Only 0.8 percent of the population resides in the moderate-income tract. Access to branches in moderate-income geographies significantly improved after considering near branches. FFB had one branch located near the moderate-income tract. Near-to branches are those located in middle- or upper-income CTs that are within one half mile from a low- or moderate-income CT.

Branch openings and closings have not adversely affected the overall accessibility of the bank's delivery systems to low- and moderate-income geographies. During the evaluation period, the bank closed two

branches in a middle-income geography and consolidated them into other branches in the AA. Branch services and hours did not vary in a way that would inconvenience portions of the AA, particularly LMI individuals. Services offered and hours are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, such as: online banking, which includes bill pay and mobile banking; automated teller machines; phone banking; and a bank by mail program. However, we place no significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping to meet the credit needs of low- and moderate-income geographies or LMI individuals.

### **Community Development Services**

FFB's performance in providing community development services in the Ohio Non-MSA AA was good. In the Ohio Non-MSA AA, three employees provided their expertise to eight different community development organizations. Sixteen of 29 services provided involved board or committee member service. In addition, one employee provided four training sessions that affected 24 total people by providing the YWCA with information on finances to woman involved in transitional housing. Several of the services included promoting small business and providing loans to small businesses. In addition, one employee provided services to an LMI healthcare provider.

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

Based on limited-scope reviews, the bank's performance under the service test in the Dayton MSA is weaker than the "High-Satisfactory" performance under the service test in Ohio and is adequate. The bank's performance under the service test in the Lima MSA is weaker than the bank's overall performance in the state, and is very poor. Performance differences in the Lima MSA and the Dayton MSA were based on branch distribution. The combined performance in the limited-scope AAs was not significant enough to have a negative impact on the bank's overall rating. Refer to table 15 in the Ohio section of appendix D for the facts and data that support these conclusions.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): (01/01/10 to 12/31/11) Investment and Service Tests and CD Loans: (06/01/10 to 12/31/11)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
FFB Hamilton, OH	Home Purchase and Home Refinance loans; Small Business and Small Farm Loans; Community Development loans, investments, and services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		No Affiliate Products Reviewed
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Cincinnati-Middleton OH-KY-IN MSA #17140 (Partial)	Full Scope	Butler, Hamilton, and Warren counties in Ohio; Boone, Campbell, and Kenton counties in Kentucky; and Dearborn, Franklin, and Ohio counties in Indiana
<u>Indiana</u> Columbus MSA Bloomington MSA Indianapolis, Indiana MSA Gary, Indiana MD #23844 (Partial) Lafayette, Indiana MSA Indiana non-MSA	Full Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope	Bartholomew county Monroe county  Lake County  Blackford, Clinton, Decatur, Fayette, Fulton, Jackson, Jay, Jennings, Randolph, Rush, and Wabash counties
<u>Ohio</u> Ohio non-MSA  Lima MSA Dayton MSA	Full Scope  Limited Scope Limited Scope	Auglaize, Mercer, Paulding, Sandusky, Van Wert, and Williams counties The entire MSA The entire MSA

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

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RATINGS FOR FIRST FINANCIAL BANK, NA				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
First Financial Bank	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Cincinnati MMSA	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of Indiana	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Ohio	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: Market Profiles for Full-Scope Areas

### Cincinnati-Middletown OH-KY-IN MMSA

Demographic Information for Full-Scope Area: FFB OH - Cincinnati-Middletown OH-KY-IN MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	434	11.52	22.35	44.24	20.97	0.92
Population by Geography	1,736	7.21	18.40	46.84	27.45	0.11
Owner-Occupied Housing by Geography	447,563	2.52	14.76	50.98	31.74	0.00
Businesses by Geography	167,908	4.86	15.79	46.73	31.92	0.70
Farms by Geography	4,146	1.25	9.65	61.12	27.88	0.10
Family Distribution by Income Level	452,525	18.96	18.28	23.03	39.72	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	168,540	12.18	26.93	46.81	14.09	0.00
Median Family Income	\$54,771	Median Housing Value				\$118,243
HUD Adjusted Median Family Income for 2011	\$70,400	Adjusted Ohio Unemployment Rate				2.19 %
Households Below the Poverty Level	10%					

\* The NA category consists of geographies without an assigned income classification. Source: 2000 U.S. Census and 2011 HUD updated MFI.

The bank's Cincinnati AA consists of a portion of the Cincinnati-Middletown, OH-KY-IN MMSA and includes the following: Butler, Hamilton, and Warren counties in Ohio; Boone, Campbell, and Kenton counties in Kentucky; and Dearborn, Franklin, and Ohio counties in Indiana. These counties are contiguous, and represent an increase in counties in the AA since the previous exam due to increased branching by the bank in 2010. The bank's AA does not arbitrarily exclude any areas, particularly low- or moderate-income areas. The AA includes the city of Cincinnati, the third largest city in the state of Ohio, with a population of 296,943 based on 2010 census data. Therefore, the city of Cincinnati accounted for 17.1 percent of the population in the bank's multistate AA.

FFB provides a full range of loan and deposit products to the AA. The bank has 42 total branches in the multistate AA. In the Ohio portion of the AA, FFB has 36 branches. In the Kentucky portion of the AA, the bank has three branches in Boone County and one in Kenton County. For the Indiana portion of the AA, the bank has two branches in Dearborn County. The bank has no stand-alone deposit-taking ATMs located in the multistate AA.

Competition for financial services within the MSA is intense and includes several branches of multi-national and regional banks, local community banks, credit unions and other nonbank financial service providers. As of June 30, 2011, the bank's deposits in the multistate AA totaled \$2.2 billion, and FFB ranked fourth of 64 banks with a 3.7 percent market share.

#### Employment and Economic Factors

According to the Bureau of Labor Statistics, as of October 2011, the unemployment rate for the AA ranged from 7.1 percent in Warren County, OH to 8.7 percent in Campbell County, KY, with the Cincinnati – Middletown OH-KY-IN Multistate Metropolitan Statistical area at 8.1 percent. This compares to October, 2010 unemployment rates of 8.0, 10.0, and, and 9.0 percent, respectively. The unemployment rate decreased in every county within the bank's multistate AA, though the unemployment rate in all counties in the AA exceeded the national average of 8.6 percent in 2010. However, by 2011, only one county exceeded the national average of 8.5 percent in 2011, namely Campbell County, KY at 8.7 percent. Therefore, recovery from depressed economic conditions in Campbell County, KY have lagged behind the United States as a whole, though the rest of the bank's multistate AA has recovered more quickly than the nation average.

The major employers in the AA include wholesale trade, retail trade, manufacturing, and health care and social assistance. Cincinnati is home to the following Fortune 500 companies: Kroger, Procter and Gamble, Macy's, and Fifth Third Bancorp. The three largest employers in Cincinnati are Kroger (17,000 jobs), the University of Cincinnati (15,000 jobs), and Procter and Gamble (14,000 jobs), which combine provide approximately 48,000 jobs to the Cincinnati—Middletown OH-KY-IN MMSA. The City of Cincinnati is positioned for growth. According to the GO Cincinnati Growth and Opportunities study (2007) indicators forecast this growth to occur predominantly in service-providing industries including trade, transportation, utilities, information, financial activities, professional and business services, education, health, leisure and hospitality, and government. While costs increase elsewhere, Cincinnati remains a financially suitable home with its cost of living residing well below the national average.

### Housing

Based on 2000 census data and 2011 HUD information, of all owner-occupied units in the AA, 17.28 percent were located in LMI census tracts. The median housing value in the multistate AA was \$118,243, yet 10.0 percent of families were below the poverty level, rendering the price of housing unreachable for many families in LMI census tracts. According to data from real estate information firm CoreLogic, foreclosure rates in the multistate MSA decreased from 1.9 percent in April 2010 to 0.1 percent in March 2012.

### Community Contact

Contact by the OCC with eight local based non-profit organizations serving the Cincinnati area identified community development, affordable housing for low- and moderate-income families and economic development as the greatest needs in the assessment area. The bank's assessment of needs in the area concurred with the needs identified by the community contacts. Most community contacts cited a community need is lending to LMI borrowers because of tightened credit standards in the fallout from the recent recession.

# State of Indiana

## Columbus, IN MSA

Demographic Information for Full-Scope Area: Columbus IN MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	15	0.00	20.00	60.00	20.00	0.00
Population by Geography	71,435	0.00	16.97	66.59	16.43	0.00
Owner-Occupied Housing by Geography	20,738	0.00	11.17	70.83	18.00	0.00
Businesses by Geography	6,485	0.00	24.44	58.40	17.16	0.00
Farms by Geography	334	0.00	4.79	84.13	11.08	0.00
Family Distribution by Income Level	20,191	17.59	19.75	24.22	38.44	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	7,539	0.00	26.41	65.11	8.48	0.00
Median Family Income	\$52,072	Median Housing Value				\$104,538
HUD Adjusted Median Family Income for 2011 Households Below the Poverty Level	\$67,300 8%	Adjusted Ohio Unemployment Rate				1.91%

\* The NA category consists of geographies without an assigned income classification. Source: 2000 U.S. Census and 2011 HUD updated MFI.

The Columbus, IN MSA consists of the geographies within Bartholomew County. The bank's AA does not arbitrarily exclude any areas, particularly moderate-income areas and there are no low-income census tracts in the assessment area. The AA includes 15 census tracts. There are zero low-income CTs, three moderate-income CTs, nine middle-income CTs, and three upper-income CTs. Total population in Bartholomew County was 71,435 as of the 2000 Census. Over 50% of the population in the county is located in the city of Columbus.

FFB has five full service branches in the AA and six deposit-taking ATMs. There is a remote off-site deposit-taking ATM in Taylorsville, IN with no attached branch. FFB deposits in the AA represented 27.45% of the total market share in Indiana and totaled \$535,777. The majority of deposits, about 80%, came from moderate-income areas, while 14% came from middle-income areas and 6% came from upper-income areas.

Competition for financial services in the AA is somewhat high. FFB staff cautions that due to the high volume of financial institutions in the Columbus Market, competition for small business financing is especially fierce. However, supporting small businesses in Bartholomew County with available credit is the need voiced most often for the Columbus MSA. FFB has the highest share of deposits in the Bartholomew market when compared to competition. As of June 30, 2011, FFB had 47% of all deposits (\$567,903) in the market area. The next highest competitors in the market were Indiana Bank and Trust Company with a 27% share and Salin Bank and Trust Company with a 9% share.

### Employment and Economic Factors:

According to the Bureau of Labor Statistics, as of December 2011, the unemployment rate for the Columbus, IN AA was 6.7%. Unemployment has improved over the previous few years and the rate at December 2011 compares favorably with December 2010, when the unemployment rate was 8.0%. Unemployment also improved from 2009 to 2010 in the assessment area. As of December 2009, the unemployment rate for the Columbus, IN MSA was 9.6%. From a monthly perspective, the unemployment rate has consistently trended downward since January 2010.

Manufacturing is by far the largest industry sector in the AA. Columbus is home to a few major manufacturing companies. Cummins Inc., a fortune 500 company, is the largest corporation headquartered in the AA with total assets of \$12.5 billion as of 2012. There is a network of smaller businesses in the area, which operate as suppliers for Cummins. The company employed about 46,000 employees as of 2012 and about 5,500 were in Columbus. The next highest employer in the AA is the Bartholomew School District with 1,800 employees. The North American headquarters of Toyota Industries is also located in the AA.

### Housing

Based on 2000 census data, there were 15,985 households in the Columbus MSA and over 17,000 housing units. The majority of homes were owner-occupied at 64.89% and the median value of owner-occupied homes was \$111,900. Of the 71,435 persons in Bartholomew County, 0% live in low-income areas, 16.97% live in moderate-income areas, 66.59% live in middle-income areas, and 16.43% live in upper-income areas. Owner-occupied housing includes 11.17% in moderate-income geographies, 70.83% in middle-income geographies, and 18.00% in upper-income geographies.

According to data from the Indiana Foreclosure Prevention Network 2011 Annual Report, Bartholomew County had 392 foreclosures in 2010. The state of Indiana had 41,274 foreclosures in 2010 with a foreclosure rate of 4.75% as of 4Q2010, which ranked 9th nationally. The median income for a household in the AA was \$44,184, as of the 2000 census data. The median income for a family at this time was \$52,097 and per capita income was \$21,536. As of the 2000 census, about 5.9% of families and 7.3% of the population were below the poverty line.

### Community Contact

Contact by the bank with a local based non-profit organization serving the Columbus, IN area identified needs in the community. According to the bank's correspondence with community leaders, supporting small businesses in Bartholomew County with available credit is a need voiced most often for the Columbus MSA. Columbus is home to Cummins Engine and there is a network of smaller businesses in the area that are suppliers for Cummins. FFB Staff does caution that due to numerous financial institutions in the Columbus Market, competition is fierce for small business financing.

# State of Ohio

## Ohio non-MSA areas

Demographic Information for Full-Scope Area: Ohio non-MSAs						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	57	0.00	1.75	82.46	15.79	0.00
Population by Geography	238,467	0.00	0.76	83.42	15.82	0.00
Owner-Occupied Housing by Geography	70,800	0.00	0.59	83.09	16.31	0.00
Businesses by Geography	18,087	0.00	0.81	84.17	15.03	0.00
Farms by Geography	2,459	0.00	0.16	77.43	22.41	0.00
Family Distribution by Income Level	65,755	12.47	17.75	25.82	43.96	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	19,875	0.00	1.13	86.93	11.93	0.00
Median Family Income	\$43,801	Median Housing Value				\$87,311
HUD Adjusted Median Family Income for 2011	\$52,900	Unemployment Rate				8.5%
Households Below the Poverty Level	7%					

\* The NA category consists of geographies that have not been assigned an income classification. Source: 2000 U.S. Census and 2011 HUD updated MFI.

The bank's Ohio non-MSA AA consists of Williams, Sandusky, Paulding, Van Wert, Mercer, and Auglaize counties. All of these counties are in northern Ohio. The counties of Sandusky, Paulding, Van Wert, Mercer, and Auglaize counties are contiguous. The counties of Williams and Sandusky are non-contiguous, but have similar market and economic conditions to the other four counties in the AA. The assessment area meets the requirements of the CRA regulation and does not arbitrarily exclude any areas, particularly low-or moderate-income areas.

FFB provides a full range of loan and deposit products to the AA. FFB has 11 branches in the AA, distributed among the six counties. In addition to branches, the Bank has 11 deposit-taking ATMs located in the assessment area.

Competition for the financial services within the AA is intense and includes several branches of multi-national and regional banks, as well as several community banks and credit unions. As of June 30, 2011, the bank's deposits totaled \$565 million and FFB ranked first, out of 31 banks, with a 14.8 percent market share in the AA.

### Employment and Economic Factors

According to the Bureau of Labor Statistics, as of December 2011, the unemployment rate for the AA ranged from 8.6 percent in Williams County, OH to 4.8 percent in Mercer County, OH, with the state of Ohio unemployment at 7.6 percent. This compares to December, 2010 unemployment rates of 10.8 percent, 6.2 percent, and 9.1 percent respectively. Over the same period, the unemployment rate in all six counties in the AA, as well as the state of Ohio, decreased. For all counties in the AA, the unemployment rate met or exceeded the improvement achieved in the United States unemployment rate, which improved from 9.3 percent to 8.5 percent.

The major employers in the AA include trade, education and health services, manufacturing, and government. Some of the major employers include Whirlpool Corp. in Sandusky County, and Crown Equipment Corp. in Auglaize County. A major employment industry in the area is farming and other production of the vast agricultural lands in the AA. There is no reliance on any one particular employer in the area.

### Housing

Based on 2000 census data and 2011 HUD information, of all owner-occupied units and all occupied rental units in the AA, 0.76 percent were located in low- and moderate-income census tracts. This correlates to the low level of low- and moderate-income tracts within the AA. Within the Ohio non-MSA AA, of 57 census tracts, there are no low-income tracts and only one moderate-income tract.

Demographic information indicates that housing affordability in the AA for low- and moderate-income families is reasonable. The median housing value in the AA was 87,311 with only 7.0 percent of the households being below the poverty level. However, 12.5 percent of families in the AA were low income and 17.8 percent were moderate income.

According to Policymatters.org, Ohio foreclosure rates declined 16 percent from 2010 to 2011. Over that period, the amount of foreclosures declined from 85,483 new filings to 71,556 new filings. This improvement lagged behind the overall United States improvement. Foreclosure filings for the entire U.S. improved 34.0 percent from 2,698,967 filings to 1,887,777 filings.

### Community Contact

Contact by the bank with a local community services organization serving the Ohio non-MSA areas identified affordable housing as the primary need in the community.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30 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 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

**Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This two-page table lists specific categories.

**Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

**Table 3. Geographic Distribution of Home Improvement Loans** - See table 2.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See table 2.

**Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

**Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

**Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

**Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

**Table 9. Borrower Distribution of Home Improvement Loans** - See table 8.

**Table 10. Borrower Distribution of Refinance Loans** - See table 8.

**Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is based on the most recent aggregate market data available.

**Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is based on the most recent aggregate market data available.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are at their book value as of the end of the evaluation period. Current period investments are at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding, tracked, and recorded by the bank's financial reporting system.

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

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

## Cincinnati MMSA

Table 1. Lending Volume

LENDING VOLUME		Geography: CINCINNATI MULTISTATE MSA						Evaluation Period: June 1, 2010 to December 31, 2011				
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Cincinnati-Middletown OH-KY-IN MSA	100.00	1,221	171,443	1,276	231,144	9	793	12	14,742	2,518	418,122	100.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from June 07, 2010 to November 04, 2013.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE      Geography: CINCINNATI MULTISTATE MSA      Evaluation Period: June 1, 2010 to December 31, 2011															
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occupied Units***	% Bank Loans****	% Owner Occupied Units***	% Bank Loans	% Owner Occupied Units***	% Bank Loans	% Owner Occupied Units***	% Bank Loans	Overall	Low	Mod	Mid	Up
<b>Full Review:</b>															
Cincinnati-Middletown OH-KY-IN MSA	476	100.00	2.52	3.57	14.76	16.18	50.98	48.74	31.74	31.51	1.38	4.02	2.09	1.30	1.18

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: CINNCINNATI MULTISTATE MSA															Evaluation Period: January 1, 2010 to December 31, 2011														
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*																																	
	#	% of Total**	% Owner Occupied Units***	% Bank Loans****	% Owner Occupied Units***	% Bank Loans****	% Owner Occupied Units***	% Bank Loans****	% Owner Occupied Units***	% Bank Loans****	% Owner Occupied Units***	% Bank Loans****	Overall	Low	Mod	Mid	Up																											
<b>Full Review:</b>																																												
FFB OH - Cincinnati-Middletown OH-KY-IN MSA AA	20	58.82	2.52	0.00	14.76	30.00	50.98	60.00	31.74	10.00	0.50	0.00	1.68	0.57	0.00																													

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE    Geography: CINCINNATI MULTISTATE MSA <b>Evaluation Period:</b> January 1, 2010 to December 31, 2011															
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occupied Units***	% Bank Loans****	% Owner Occupied Units***	% Bank Loans	% Owner Occupied Units***	% Bank Loans	% Owner Occupied Units***	% Bank Loans	Overall	Low	Mod	Mid	Up
<b>Full Review:</b>															
Cincinnati-Middletown OH-KY-IN MSA AA	709	39.88	2.52	0.28	14.76	9.73	50.98	47.53	31.74	42.45	0.84	0.56	1.41	0.85	0.76

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: CINCINNATI MULTISTATE MSA						Evaluation Period: January 1, 2010 to December 31, 2011							
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>4*</sup>				
	#	% of Total <sup>**</sup>	% of MF Units <sup>***</sup>	% Bank Loans <sup>****</sup>	% MF Units <sup>***</sup>	% Bank Loans	% MF Units <sup>***</sup>	% Bank Loans	% MF Units <sup>***</sup>	% Bank Loans	Overall	Low	Mod	Mid	Up
<b>Full Review:</b>															
Cincinnati-Middletown OH-KY-IN MSA AA	16	53.33	18.74	6.25	23.34	18.75	41.62	62.50	16.30	12.50	9.09	0.00	5.66	16.67	4.17

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES    Geography: CINCINNATI MULTISTATE MSA    Evaluation Period: January 1, 2010 to December 31, 2011															
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% Bank Loans	% of Businesses***	% Bank Loans	% of Businesses***	% Bank Loans	% of Businesses***	% Bank Loans	Overall	Low	Mod	Mid	Up
<b>Full Review:</b>															
Cincinnati-Middletown OH-KY-IN MSA AA	1,244	43.48	4.86	3.62	15.79	19.13	46.73	46.46	31.92	30.79	2.63	1.61	3.36	2.73	2.26

\* Based on 2011 Peer Small Business Data -- US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: CINCINNATI MULTISTATE MSA						Evaluation Period: January 1, 2010 to December 31, 2011							
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% Bank Loans	% of Farms***	% Bank Loans	% of Farms***	% Bank Loans	% of Farms***	% Bank Loans	Overall	Low	Mod	Mid	Up
<b>Full Review:</b>															
Cincinnati-Middletown OH-KY-IN MSA AA	9	6.12	1.25	0.00	9.65	0.00	61.12	88.89	27.88	11.11	5.93	0.00	0.00	6.67	4.35

\* Based on 2011 Peer Small Business Data -- US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CINCINNATI MULTISTATE MSA						Evaluation Period: June 1, 2010 to December 31, 2011							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% Bank Loans***	% Families****	% Bank Loans****	% Families****	% Bank Loans****	% Families****	% Bank Loans****	Overall	Low	Mod	Mid	Up
<b>Full Review:</b>															
Cincinnati-Middletown OH-KY-IN MSA	476	100.00	18.96	30.85	18.28	25.82	23.03	19.26	39.72	24.07	1.55	2.78	1.45	1.57	1.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.0% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT      Geography: CINCINNATI MULTISTATE MSA      Evaluation Period: June 1, 2010 to December 31, 2011															
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% Bank Loans**	% Families*****	% Bank Loans****	% Families***	% Bank Loans****	% Families***	% Bank Loans****	Over all	Low	Mod	Mid	Up
<b>Full Review:</b>															
Cincinnati-Middletown OH-KY-IN MSA	20	100.00	18.96	27.78	18.28	16.67	23.03	27.78	39.72	27.78	0.45	1.03	0.32	0.00	0.60

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 10.0% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: CINCINNATI MULTISTATE MSA Evaluation Period: June 1, 2010 to December 31, 2011															
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% Bank Loans**	% Families****	% Bank Loans****	% Families***	% Bank Loans****	% Families***	% Bank Loans****	Overall	Low	Mod	Mid	Up
<b>Full Review:</b>															
Cincinnati-Middletown OH-KY-IN MSA	709	100.00	18.96	10.18	18.28	18.36	23.03	26.38	39.72	45.08	0.71	1.00	0.88	0.81	0.57

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 15.5% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES      Geography: CINCINNATI MULTISTATE MSA      Evaluation Period: June 1, 2010 to December 31, 2011									
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% Bank Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Cincinnati-Middletown OH-KY-IN MSA	1,276	100.00	65.69	43.03	54.86	21.39	23.75	2.63	2.12

\* Based on 2011 Peer Small Business Data -- US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 17.71% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: CINCINNATI MULTISTATE MSA			Evaluation Period: June 1, 2010 to December 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share *	
	#	% of Total **	% of Farms ***	% Bank Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Cincinnati-Middletown OH-KY-IN MSA	9	100.00	97.78	88.89	77.78	22.22	0.00	5.93	6.33

\* Based on 2011 Peer Small Business Data -- US and PR

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CINCINNATI MULTISTATE MSA				Evaluation Period: June 1, 2010 to December 31, 2011			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Cincinnati-Middletown OH-KY-IN MSA	4	3,599	25	0	29	4,650	100.00	1	800

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: CINCINNATI MULTISTATE MSA Evaluation Period: January 1, 2010 to December 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Up			Low	Mod	Mid	Up	Low	Mod	Mid	Up
<b>Full Review:</b>																	
Cincinnati-Middletown OH-KY-IN MSA AA	100.00	42	100.00	2.38	26.19	38.10	30.95	1	6	0	+1	-5	-1	7.21	18.40	46.84	27.45

## Indiana

Table 1. Lending Volume

LENDING VOLUME												
Geography: INDIANA						Evaluation Period: June 1, 2010 to December 31, 2011						
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Columbus IN MSA Bartholomew County	25.68	273	42,437	287	52,249	18	2,582	4	465	582	97,733	27.5
<b>Limited Review:</b>												
Bloomington IN MSA Monroe County	4.98	31	5,648	81	15,641	0	0	0	0	112	21,289	6.9
Gary IN MD	28.43	398	57,815	242	44,679	0	0	2	2,315	642	104,809	26.6
Indianapolis-Carmel IN MSA	16.66	144	22,210	231	46,202	0	0	1	2,400	376	68,412	12.6
Lafayette IN MSA	6.66	51	5,779	75	8,449	24	3,189	0	0	150	17,417	5.7
Non-MSA AA IN	17.59	139	15,315	208	27,281	49	5,397	4	410	400	48,403	20.8

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from June 01, 2010 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: INDIANA				Evaluation Period: June 1, 2010 to December 31, 2011									
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occupied Units***	% Bank Loans****	% Owner Occupied Units***	% Bank Loans	% Owner Occupied Units***	% Bank Loans	% Owner Occupied Units***	% Bank Loans	Overall	Low	Mod	Mid	Up
<b>Full Review:</b>															
Columbus IN MSA Bartholomew County	88	26.91	0.00	0.00	11.17	10.23	70.83	67.05	18.00	22.73	2.79	0.00	1.05	3.19	2.27
<b>Limited Review:</b>															
Bloomington IN MSA Monroe County	10	3.06	0.77	10.00	8.38	20.00	54.51	40.00	36.34	30.00	0.44	4.76	1.22	0.24	0.35
Gary IN MD	142	43.43	2.71	0.00	24.95	2.82	45.60	40.85	26.74	56.34	1.46	0.00	0.42	1.22	2.03
Indianapolis-Carmel IN MSA	44	13.46	2.83	0.00	18.37	9.09	50.42	61.36	28.39	29.55	0.09	0.00	0.09	0.12	0.07
Lafayette IN MSA	13	3.98	0.21	0.00	7.90	0.00	62.11	69.23	29.79	30.77	0.19	0.00	0.00	0.31	0.08
Non-MSA AA IN	30	9.17	0.00	0.00	3.90	3.33	90.41	86.67	5.70	10.00	0.64	0.00	0.00	0.68	0.45

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: INDIANA								Evaluation Period: June 1, 2010 to December 31, 2011				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occupied Units***	% Bank Loans****	% Owner Occupied Units***	% Bank Loans	% Owner Occupied Units***	% Bank Loans	% Owner Occupied Units***	% Bank Loans	Over all	Low	Mod	Mid	Up
<b>Full Review:</b>															
Columbus IN MSA Bartholomew County	0	0.00	0.00	0.00	11.17	0.00	70.83	0.00	18.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Bloomington IN MSA Monroe County	0	0.00	0.77	0.00	8.38	0.00	54.51	0.00	36.34	0.00	0.00	0.00	0.00	0.00	0.00
Gary IN MD	3	60.00	2.71	0.00	24.95	33.33	45.60	66.67	26.74	0.00	0.62	0.00	1.12	0.85	0.00
Indianapolis-Carmel IN MSA	1	20.00	2.83	0.00	18.37	0.00	50.42	0.00	28.39	100.00	0.07	0.00	0.00	0.00	0.19
Lafayette IN MSA	0	0.00	0.21	0.00	7.90	0.00	62.11	0.00	29.79	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA AA IN	1	20.00	0.00	0.00	3.90	0.00	90.41	100.00	5.70	0.00	0.23	0.00	0.00	0.26	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: INDIANA				Evaluation Period: June 1, 2010 to December 31, 2011			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*								
	#	% of Total**	% Owner Occupied Units***	% Bank Loans****	% Owner Occupied Units***	% Bank Loans	% Owner Occupied Units***	% Bank Loans	% Owner Occupied Units***	% Bank Loans	Over all	Low	Mod	Mid	Up				
<b>Full Review:</b>																			
Columbus IN MSA Bartholomew County	183	26.37	0.00	0.00	11.17	3.83	70.83	60.66	18.00	35.52	3.84	0.00	5.81	3.56	4.08				
<b>Limited Review:</b>																			
Bloomington IN MSA Monroe County	21	3.03	0.77	9.52	8.38	0.00	54.51	23.81	36.34	66.67	0.39	6.67	0.00	0.18	0.55				
Gary IN MD	250	36.02	2.71	0.00	24.95	1.60	45.60	37.20	26.74	61.20	1.32	0.00	0.67	1.09	1.60				
Indianapolis-Carmel IN MSA	96	13.83	2.83	1.04	18.37	11.46	50.42	64.58	28.39	22.92	0.09	0.41	0.23	0.13	0.04				
Lafayette IN MSA	37	5.33	0.21	0.00	7.90	2.70	62.11	86.49	29.79	10.81	0.45	0.00	0.74	0.65	0.19				
Non-MSA AA IN	107	15.42	0.00	0.00	3.90	0.93	90.41	89.72	5.70	9.35	1.51	0.00	0.00	1.53	1.80				

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: INDIANA				Evaluation Period: June 1, 2010 to December 31, 2011					Market Share (%) by Geography *				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *					
	#	% of Total**	% of MF Units***	% Bank Loans****	% MF Units***	% Bank Loans	% MF Units***	% Bank Loans	% MF Units***	% Bank Loans	Overall	Low	Mod	Mid	Up	
<b>Full Review:</b>																
Columbus IN MSA Bartholomew County	2	20.00	0.00	0.00	35.23	50.00	47.85	50.00	16.91	0.00	33.33	0.00	100.00	33.33	0.00	
<b>Limited Review:</b>																
Bloomington IN MSA Monroe County	0	0.00	25.20	0.00	18.67	0.00	33.44	0.00	22.69	0.00	0.00	0.00	0.00	0.00	0.00	
Gary IN MD	3	30.00	13.32	0.00	30.35	66.67	41.88	0.00	14.45	33.33	2.33	0.00	7.14	0.00	0.00	
Indianapolis-Carmel IN MSA	3	30.00	6.74	0.00	31.76	0.00	47.66	100.00	13.84	0.00	1.72	0.00	0.00	2.56	0.00	
Lafayette IN MSA	1	10.00	27.82	0.00	23.72	0.00	20.98	100.00	27.49	0.00	2.13	0.00	0.00	9.09	0.00	
Non-MSA AA IN	1	10.00	0.00	0.00	7.91	0.00	87.07	100.00	5.02	0.00	8.33	0.00	0.00	9.09	0.00	

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: INDIANA				Evaluation Period: June 1, 2010 to December 31, 2011				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *									
	#	% of Total**	% of Businesses***	% Bank Loans	% of Businesses***	% Bank Loans	% of Businesses***	% Bank Loans	% of Businesses***	% Bank Loans	Overall	Low	Mod	Mid	Up					
<b>Full Review:</b>																				
Columbus IN MSA Bartholomew County	287	25.53	0.00	0.00	24.44	37.28	58.40	49.13	17.16	13.59	15.21	0.00	20.89	15.26	10.30					
<b>Limited Review:</b>																				
Bloomington IN MSA Monroe County	81	7.21	11.69	25.93	13.49	14.81	44.73	33.33	30.09	25.93	2.89	6.42	3.21	2.23	2.54					
Gary IN MD	242	21.53	4.23	3.31	18.01	12.81	43.23	40.91	34.52	42.98	2.41	0.72	2.82	2.51	2.40					
Indianapolis-Carmel IN MSA	231	20.55	2.29	2.16	14.39	15.58	49.57	61.90	33.69	20.35	0.49	0.84	0.73	0.67	0.21					
Lafayette IN MSA	75	6.67	3.87	0.00	21.69	26.67	46.75	66.67	27.51	6.67	1.84	0.00	3.02	2.60	0.19					
Non-MSA AA IN	208	18.51	0.00	0.00	5.08	2.40	88.84	93.27	6.08	4.33	3.65	0.00	1.30	4.12	2.04					

\* Based on 2011 Peer Small Business Data -- US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: INDIANA				Evaluation Period: June 1, 2010 TO December 31, 2011				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% of Farms***	% Bank Loans	% of Farms***	% Bank Loans	% of Farms***	% Bank Loans	% of Farms***	% Bank Loans	Overall	Low	Mod	Mid	Up					
<b>Full Review:</b>																				
Columbus IN MSA Bartholomew County	18	19.78	0.00	0.00	4.79	0.00	84.13	77.78	11.08	22.22	21.62	0.00	0.00	17.14	100.00					
<b>Limited Review:</b>																				
Bloomington IN MSA Monroe County	0	0.00	1.81	0.00	3.92	0.00	65.66	0.00	28.61	0.00	0.00	0.00	0.00	0.00	0.00					
Gary IN MD	0	0.00	1.40	0.00	9.66	0.00	53.27	0.00	35.67	0.00	0.00	0.00	0.00	0.00	0.00					
Indianapolis-Carmel IN MSA	0	0.00	0.93	0.00	9.63	0.00	65.06	0.00	24.39	0.00	0.00	0.00	0.00	0.00	0.00					
Lafayette IN MSA	24	26.37	0.10	0.00	3.50	0.00	72.53	83.33	23.87	16.67	5.31	0.00	0.00	5.83	0.00					
Non-MSA AA IN	49	53.85	0.00	0.00	1.19	0.00	91.87	93.88	6.94	6.12	4.23	0.00	0.00	4.30	6.45					

\* Based on 2011 Peer Small Business Data -- US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: INDIANA								Evaluation Period: June 1, 2010 to December 31, 2011				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total*	% Families**	% Bank Loans***	% Families****	% Bank Loans****	% Families**	% Bank Loans***	% Families**	% Bank Loans***	Overall	Low	Mod	Mid	Up
<b>Full Review:</b>															
Columbus IN MSA Bartholomew County	88	26.91	17.59	22.99	19.75	21.84	24.22	27.59	38.44	27.59	3.21	5.29	2.62	3.34	2.50
<b>Limited Review:</b>															
Bloomington IN MSA Monroe County	10	3.06	17.40	0.00	16.89	30.00	21.13	10.00	44.58	60.00	0.54	0.00	0.68	0.32	0.69
Gary IN MD	142	43.43	22.62	7.35	18.53	36.03	22.51	25.00	36.34	31.62	1.65	0.75	1.99	1.20	2.14
Indianapolis-Carmel IN MSA	44	13.46	19.27	25.58	18.64	18.60	23.18	11.63	38.90	44.19	0.11	0.17	0.09	0.05	0.14
Lafayette IN MSA	13	3.98	18.19	0.00	18.87	8.33	24.66	25.00	38.29	66.67	0.23	0.00	0.19	0.18	0.43
Non-MSA AA IN	30	9.17	16.54	20.69	20.81	44.83	26.55	13.79	36.10	20.69	0.73	0.56	1.15	0.40	0.60

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.1% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT				Geography: INDIANA				Evaluation Period: June 1, 2010 to December 31, 2011								
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% Bank Loans****	% Families*****	% Bank Loans****	% Families***	% Bank Loans****	% Families***	% Bank Loans****	Overall	Low	Mod	Mid	Up	
<b>Full Review:</b>																
Columbus IN MSA Bartholomew County	0	0.00	17.59	0.00	19.75	0.00	24.22	0.00	38.44	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Bloomington IN MSA Monroe County	0	0.00	17.40	0.00	16.89	0.00	21.13	0.00	44.58	0.00	0.00	0.00	0.00	0.00	0.00	
Gary IN MD	3	60.00	22.62	0.00	18.53	66.67	22.51	33.33	36.34	0.00	0.68	0.00	1.85	0.84	0.00	
Indianapolis-Carmel IN MSA	1	20.00	19.27	0.00	18.64	0.00	23.18	0.00	38.90	100.00	0.07	0.00	0.00	0.00	0.18	
Lafayette IN MSA	0	0.00	18.19	0.00	18.87	0.00	24.66	0.00	38.29	0.00	0.00	0.00	0.00	0.00	0.00	
Non-MSA AA IN	1	20.00	16.54	0.00	20.81	0.00	26.55	0.00	36.10	100.00	0.24	0.00	0.00	0.00	0.68	

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: INDIANA				Evaluation Period: June 1, 2010 to December 31, 2011								
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families ***	% Bank Loans****	% Families*****	% Bank Loans****	% Families***	% Bank Loans****	% Families***	% Bank Loans****	Overall	Low	Mod	Mid	Up
<b>Full Review:</b>															
Columbus IN MSA Bartholomew County	183	26.37	17.59	5.00	19.75	17.78	24.22	17.78	38.44	59.44	4.44	5.60	5.56	1.96	5.01
<b>Limited Review:</b>															
Bloomington IN MSA Monroe County	21	3.03	17.40	5.26	16.89	15.79	21.13	26.32	44.58	52.63	0.43	0.78	0.25	0.67	0.34
Gary IN MD	250	36.02	22.62	4.07	18.53	15.85	22.51	24.80	36.34	55.28	1.61	1.13	1.37	1.35	1.95
Indianapolis-Carmel IN MSA	96	13.83	19.27	10.71	18.64	20.24	23.18	16.67	38.90	52.38	0.09	0.20	0.10	0.04	0.09
Lafayette IN MSA	37	5.33	18.19	2.78	18.87	22.22	24.66	30.56	38.29	44.44	0.54	0.00	0.81	0.27	0.69
Non-MSA AA IN	107	15.42	16.54	7.69	20.81	23.08	26.55	25.96	36.10	43.27	1.67	2.09	1.81	1.48	1.64

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: INDIANA			Evaluation Period: June 1, 2010 to December 31, 2011	
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% Bank Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Columbus IN MSA Bartholomew County	287	25.53	65.40	39.72	54.70	24.74	20.56	15.21	13.93
<b>Limited Review:</b>									
Bloomington IN MSA Monroe County	81	7.21	65.43	58.02	55.56	18.52	25.93	2.89	3.85
Gary IN MD	242	21.53	67.47	46.28	58.26	17.36	24.38	2.41	2.75
Indianapolis-Carmel IN MSA	231	20.55	66.06	51.52	49.35	24.24	26.41	0.49	0.60
Lafayette IN MSA	75	6.67	65.53	54.67	72.00	14.67	13.33	1.84	2.26
Non-MSA AA IN	208	18.51	69.91	48.08	67.31	14.42	18.27	3.65	2.73

\* Based on 2011 Peer Small Business Data -- US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 19.84% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS 2011		Geography: INDIANA			Evaluation Period: June 1, 2010 to December 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share *	
	#	% of Total **	% of Farms ***	% Bank Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Columbus IN MSA Bartholomew County	18	19.78	98.50	83.33	33.33	61.11	5.56	21.62	21.43
<b>Limited Review:</b>									
Bloomington IN MSA Monroe County	0	0.00	97.89	0.00	0.00	0.00	0.00	0.00	0.00
Gary IN MD	0	0.00	96.88	0.00	0.00	0.00	0.00	0.00	0.00
Indianapolis-Carmel IN MSA	0	0.00	98.07	0.00	0.00	0.00	0.00	0.00	0.00
Lafayette IN MSA	24	26.37	97.53	91.67	58.33	29.17	12.50	5.31	6.90
Non-MSA AA IN	49	53.85	98.64	85.71	71.43	16.33	12.24	4.23	2.99

\* Based on 2011 Peer Small Business Data -- US and PR

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 4.40% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: INDIANA				Evaluation Period: June 1, 2010 to December 31, 2011			
Assessment Area:	Prior Period Investments *		Current Period Investments		Total Investments			Unfunded Commitments **	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Columbus IN MSA Bartholomew County	2	3,360	6	107	8	3,467	27.70	0	0
<b>Limited Review:</b>									
Bloomington IN MSA Monroe County	1	500	2	2	3	502	4.01	0	0
Gary IN MD	2	1,337	19	584	21	1,921	15.35	0	0
Indianapolis-Carmel IN MSA	3	2,097	9	590	12	2,687	21.47	0	0
Lafayette IN MSA	1	116	8	663	9	779	6.22	0	0
Non-MSA AA IN	2	1,500	6	661	8	2,161	17.26	1	942
Indiana Statewide	1	1,000	0	0	1	1,000	7.99	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: INDIANA Evaluation Period: January 1, 2010 to December 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Up			Low	Mod	Mid	Up	Low	Mod	Mid	Up
<b>Full Review:</b>																	
Columbus IN MSA Bartholomew County	27.45	5	15.62	0.00	40.00	40.00	20.00	0	1	0	0	-1	0	0.00	16.97	66.59	16.43
<b>Limited Review:</b>																	
Bloomington IN MSA Monroe County	6.91	1	3.13	100.0	0.00	0.00	0.00	0	0	0	0	0	0	14.07	15.72	43.21	27.00
Gary IN MD	26.56	8	25.00	0.00	0.00	50.00	50.00	0	0	0	0	0	0	5.69	30.17	41.69	22.45
Indianapolis-Carmel IN MSA	12.58	6	18.75	0.00	16.67	83.33	0.00	1	1	0	0	0	0	4.63	22.84	47.96	24.57
Lafayette IN MSA	5.70	3	9.38	0.00	0.00	66.67	33.33	0	0	0	0	0	0	10.27	11.80	48.69	25.20
Non-MSA AA IN	20.79	9	28.13	0.00	11.11	88.89	0.00	0	5	0	-2	-3	0	0.00	4.56	90.08	5.35

# Ohio

Table 1. Lending Volume

LENDING VOLUME		Geography: OHIO						Evaluation Period: June 1, 2010 to December 31, 2011				
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Non-MSA AA OH	46.23	242	23,872	211	22,059	43	5,381	2	5,840	498	57,152	78.6
<b>Limited Review:</b>												
Dayton OH MSA	47.62	238	26,051	271	69,068	2	310	4	4,835	515	100,264	14.6
Lima OH MSA	6.15	53	2,771	11	4,270	2	366	0	0	66	7,407	6.8

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from June 01, 2010 to December 31, 2011.

\*\*\* Deposit Data as of June 01, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: OHIO				Evaluation Period: June 1, 2010 to December 31, 2011									
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occupied Units***	% Bank Loans****	% Owner Occupied Units***	% Bank Loans	% Owner Occupied Units***	% Bank Loans	% Owner Occupied Units***	% Bank Loans	Overall	Low	Mod	Mid	Up
<b>Full Review:</b>															
Non-MSA AA OH	65	44.83	0.00	0.00	0.59	3.08	83.09	87.69	16.31	9.23	2.66	0.00	15.38	2.63	2.21
<b>Limited Review:</b>															
Dayton OH MSA	65	44.83	2.70	3.08	18.36	20.00	51.79	41.54	27.15	35.38	0.93	5.13	2.53	0.63	0.87
Lima OH MSA	15	10.34	1.24	0.00	19.97	26.67	56.56	73.33	22.23	0.00	1.66	0.00	4.21	2.10	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: June 1, 2010 to December 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occupied Units***	% Bank Loans****	% Owner Occupied Units***	% Bank Loans	% Owner Occupied Units***	% Bank Loans	% Owner Occupied Units***	% Bank Loans	Overall	Low	Mod	Mid	Up	
<b>Full Review:</b>																
Non-MSA AA OH	8	88.89	0.00	0.00	0.59	0.00	83.09	100.00	16.31	0.00	2.81	0.00	0.00	3.47	0.00	
<b>Limited Review:</b>																
Dayton OH MSA	0	0.00	2.70	0.00	18.36	0.00	51.79	0.00	27.15	0.00	0.00	0.00	0.00	0.00	0.00	
Lima OH MSA	1	11.11	1.24	0.00	19.97	0.00	56.56	100.00	22.23	0.00	2.56	0.00	0.00	3.57	0.00	

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO						Evaluation Period: June 1, 2010 to December 31, 2011						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occupied Units***	% Bank Loans****	% Owner Occupied Units***	% Bank Loans	% Owner Occupied Units***	% Bank Loans	% Owner Occupied Units***	% Bank Loans	Overall	Low	Mod	Mid	Up
<b>Full Review:</b>															
Non-MSA AA OH	168	44.80	0.00	0.00	0.59	0.60	83.09	86.31	16.31	13.10	2.45	0.00	0.00	2.82	0.75
<b>Limited Review:</b>															
Dayton OH MSA	170	45.33	2.70	0.59	18.36	7.65	51.79	51.76	27.15	40.00	1.31	2.27	1.88	1.55	0.99
Lima OH MSA	37	9.87	1.24	0.00	19.97	21.62	56.56	62.16	22.23	16.22	2.27	0.00	6.45	2.48	1.05

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: OHIO				Evaluation Period: June 1, 2010 to December 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Up
	#	% of Total**	% of MF Units***	% Bank Loans****	% MF Units***	% Bank Loans	% MF Units***	% Bank Loans	% MF Units***	% Bank Loans					
<b>Full Review:</b>															
Non-MSA AA OH	1	25.00	0.00	0.00	3.59	0.00	93.11	100.00	3.30	0.00	12.50	0.00	0.00	14.29	0.00
<b>Limited Review:</b>															
Dayton OH MSA	3	75.00	10.67	0.00	22.17	33.33	47.57	33.33	19.60	33.33	11.11	0.00	25.00	11.11	0.00
Lima OH MSA	0	0.00	10.31	0.00	43.37	0.00	37.90	0.00	8.43	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: OHIO				Evaluation Period: June 1, 2010 to December 31, 2011			
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*								
	#	% of Total**	% of Businesses***	% Bank Loans	% of Businesses***	% Bank Loans	% of Businesses***	% Bank Loans	% of Businesses***	% Bank Loans	Overall	Low	Mod	Mid	Up				
<b>Full Review:</b>																			
Non-MSA AA OH	211	42.80	0.00	0.00	0.81	1.42	84.17	89.10	15.03	9.48	3.94	0.00	6.25	4.27	2.86				
<b>Limited Review:</b>																			
Dayton OH MSA	271	54.97	7.14	9.59	18.17	24.72	44.46	37.27	30.23	28.41	2.16	3.79	2.78	2.00	1.82				
Lima OH MSA	11	2.23	7.23	0.00	18.45	0.00	52.23	100.00	22.09	0.00	0.52	0.00	0.00	1.09	0.00				

\* Based on 2011 Peer Small Business Data -- US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: OHIO				Evaluation Period: June 1, 2010 to December 31, 2011								
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% Bank Loans	% of Farms***	% Bank Loans	% of Farms***	% Bank Loans	% of Farms***	% Bank Loans	Overall	Low	Mod	Mid	Up
<b>Full Review:</b>															
Non-MSA AA OH	43	91.49	0.00	0.00	0.16	0.00	77.43	86.05	22.41	13.95	4.30	0.00	0.00	4.06	5.88
<b>Limited Review:</b>															
Dayton OH MSA	2	4.26	0.88	0.00	8.53	0.00	74.36	100.00	16.24	0.00	1.47	0.00	0.00	1.56	0.00
Lima OH MSA	2	4.26	0.17	0.00	2.51	0.00	77.22	100.00	20.10	0.00	1.41	0.00	0.00	1.60	0.00

\* Based on 2011 Peer Small Business Data -- US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: OHIO						Evaluation Period: June 1, 2010 to December 31, 2011						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% Bank Loans****	% Families*****	% Bank Loans*****	% Families***	% Bank Loans****	% Families***	% Bank Loans****	Overall	Low	Mod	Mid	Up
<b>Full Review:</b>															
Non-MSA AA OH	65	44.83	12.47	25.00	17.75	21.88	25.82	28.13	43.96	25.00	3.03	5.45	2.55	3.38	2.03
<b>Limited Review:</b>															
Dayton OH MSA	65	44.83	20.58	21.43	19.36	25.00	22.61	17.86	37.45	35.71	0.36	0.26	0.46	0.26	0.39
Lima OH MSA	15	10.34	19.16	0.00	18.83	75.00	22.82	0.00	39.19	25.00	0.29	0.00	0.97	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 33.8% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: June 1, 2010 to December 31, 2011									
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% Bank Loans****	% Families*****	% Bank Loans****	% Families***	% Bank Loans****	% Families***	% Bank Loans****	Overall	Low	Mod	Mid	Up	
<b>Full Review:</b>																
Non-MSA AA OH	8	88.89	12.47	12.50	17.75	25.00	25.82	25.00	43.96	37.50	2.99	4.76	6.67	2.86	1.23	
<b>Limited Review:</b>																
Dayton OH MSA	0	0.00	20.58	0.00	19.36	0.00	22.61	0.00	37.45	0.00	0.00	0.00	0.00	0.00	0.00	
Lima OH MSA	1	11.11	19.16	0.00	18.83	0.00	22.82	100.00	39.19	0.00	2.78	0.00	0.00	9.09	0.00	

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: June 1, 2010 to December 31, 2011									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% Bank Loans****	% Families*****	% Bank Loans****	% Families***	% Bank Loans****	% Families***	% Bank Loans****	Overall	Low	Mod	Mid	Up	
<b>Full Review:</b>																
Non-MSA AA OH	168	44.80	12.47	5.70	17.75	16.46	25.82	28.48	43.96	49.37	2.45	2.66	2.73	2.91	2.01	
<b>Limited Review:</b>																
Dayton OH MSA	170	45.33	20.58	8.20	19.36	13.11	22.61	22.95	37.45	55.74	0.31	0.56	0.13	0.37	0.30	
Lima OH MSA	37	9.87	19.16	20.00	18.83	20.00	22.82	0.00	39.19	60.00	0.34	0.89	0.32	0.00	0.49	

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 40.3% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: OHIO			Evaluation Period: June 1, 2010 to December 31, 2011	
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% Bank Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Non-MSA AA OH	211	42.80	68.70	44.55	74.88	13.27	11.85	3.94	3.52
<b>Limited Review:</b>									
Dayton OH MSA	271	54.97	67.96	25.09	38.01	25.46	36.53	2.16	1.31
FFB OH - Lima OH MSA	11	2.23	65.08	18.18	54.55	0.00	45.45	0.52	0.00

\* Based on 2011 Peer Small Business Data -- US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 24.95% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: OHIO		Evaluation Period: June 1, 2010 to December 31, 2011			
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share *	
	#	% of Total**	% of Farms***	% Bank Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Non-MSA AA OH	43	91.49	98.82	83.72	55.81	30.23	13.95	4.30	3.48
<b>Limited Review:</b>									
Dayton OH MSA	2	4.26	98.17	100.00	50.00	50.00	0.00	1.47	1.92
Lima OH MSA	2	4.26	98.49	50.00	50.00	0.00	50.00	1.41	0.00

\* Based on 2011 Peer Small Business Data -- US and PR

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 6.38% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: OHIO				Evaluation Period: June 1, 2010 to December 31, 2011			
Assessment Area:	Prior Period Investments *		Current Period Investments		Total Investments			Unfunded Commitments **	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Non-MSA AA OH	1	818	1	1	2	819	17.85	0	0
<b>Limited Review:</b>									
Dayton OH MSA	0	0	6	614	6	614	13.38	0	0
Lima OH MSA	0	0	1	1,430	1	1,430	31.16	1	420
Ohio Statewide	0	0	1	1,726	1	1,726	37.61	1	1,274

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: OHIO				Evaluation Period: January 1, 2010 to December 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Up			Low	Mod	Mid	Up	Low	Mod	Mid	Up
<b>Full Review:</b>																	
Non-MSA AA OH	78.63	11	68.75	0.00	0.00	90.91	9.09	0	2	0	0	-2	0	0.00	0.76	83.42	15.82
<b>Limited Review:</b>																	
Dayton OH MSA	14.60	4	25.00	0.00	25.00	25.00	50.00	0	0	0	0	0	0	4.68	23.77	48.05	23.51
Lima OH MSA	6.77	1	6.25	0.00	0.00	100.0	0.00	0	0	0	0	0	0	2.94	24.02	53.54	19.50