



## **PUBLIC DISCLOSURE**

October 26, 2015

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

The National Bank of Indianapolis  
Charter Number 22652

107 North Pennsylvania Street, Suite 700  
Indianapolis, IN 46204

Office of the Comptroller of the Currency

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

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

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## Overall CRA Rating

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

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

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

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

The major factors that support this rating include:

- Good lending activity, given the bank’s deposit market share and level of loan competition.
- A substantial majority of loans made inside the assessment area, with no unexplained conspicuous lending gaps.
- An adequate geographic distribution of loans; the geographic distribution of home mortgage loans was adequate and geographic distribution of small loans to businesses was good.
- An adequate borrower distribution of loans; the borrower distribution of both home mortgage loans and small loans to businesses was adequate.
- The positive impact of using of flexible home mortgage loan products; these products benefitted low- and moderate-income borrowers.
- A significantly positive impact of Community Development (CD) Lending; the bank originated CD loans totaling 30.0 percent of tier 1 capital that demonstrated good responsiveness to identified needs in the Assessment Area (AA).
- A good level of CD investments that demonstrated excellent responsiveness to the identified credit needs in the AA for small business lending and affordable housing. The bank’s CD investments, including those in the broader statewide area with a purpose, mandate or function to serve the AA, totaled 4.2 percent of tier 1 capital.
- A branch distribution that was reasonably accessible to geographies and individuals of different income levels within the AA.
- A good level of CD services that demonstrated good responsiveness to identified needs.

## Definitions and Common Abbreviations

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

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

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

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

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

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

Activities that revitalize or stabilize-

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined

in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

## **Description of Institution**

The National Bank of Indianapolis (NBI) is a \$1.7 billion, intrastate institution headquartered in Indianapolis, Indiana. NBI is wholly owned by The National Bank of Indianapolis Corporation (NBIC), which is also headquartered in Indianapolis, Indiana. NBIC has no other subsidiaries.

NBI was founded in 1993, with a focus on providing specialized services to professionals, executives, small to mid-size businesses, and not-for-profit organizations located within the Indianapolis area. As such, NBI offers a variety of deposit and wealth management services through its banking locations. The bank also offers a variety of commercial, home mortgage, and consumer loan products. NBI does not actively market these products and services.

NBI serves its assessment area through its branch network as well as alternative delivery channels. NBI has 12 office locations within the assessment area, which it delineates as Marion County and a portion of three surrounding counties (Hamilton, Boone, and Johnson). There were no branch openings or closings during the evaluation period. In addition to the branch network, NBI's delivery channels include ATMs, internet banking, mobile banking, and remote deposit capture.

As of June 30, 2015, the loan portfolio totaled \$1.1 billion. The portfolio consisted of 64 percent commercial and commercial real estate, 33 percent residential real estate, and three percent consumer loans. Net loans represent 73 percent of total deposits and 65 percent of total assets. Tier 1 capital totaled \$133 million.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its assessment area. NBI received a satisfactory rating on its last CRA evaluation dated July 16, 2012.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We separately evaluated the home mortgage loans (home purchase and home refinance) that the bank reported under HMDA and small business loans that the bank reported under CRA. We selected these loans because they represent the bank's primary loan products. Primary loan products are those products for which the bank originated at least 20 loans within the AA during the evaluation period of January 1, 2012 through December 31, 2014.

Multi-family loans are not a primary loan product; therefore, we did not evaluate this product separately. However, we did consider multi-family loans meeting the CD definition as part of the evaluation of CD lending. The evaluation period for community development loans, the investment test and the service test is July 17, 2012 through October 26, 2015. This represents the period from the end of the previous CRA evaluation to the beginning of this CRA evaluation.

In February 2013, the Office of Management and Budget (OMB) published the 2010 revisions of MSAs, effective in 2014. These revisions included changes to the income designation for several census tracts within the bank's AA. Due to these changes, we completed an analysis of the combined data for 2012 and 2013 and a separate analysis of 2014 data. The data presented in the performance tables in Appendix C represents the combined data for 2012 and 2013. The 2014 data is discussed within the applicable narrative sections of this evaluation.

### Data Integrity

To assess data integrity, we conducted an independent test of the data NBI collected for home mortgage, small business, and small farm loan products. The bank's loan data was substantially accurate and it is used without exception in this evaluation.

### Selection of Areas for Full-Scope Review

NBI has only one AA and we performed a full-scope review of this AA. This full-scope review considers performance context, quantitative, and qualitative factors. Refer to the table in Appendix A for more information.

### Ratings

As NBI has only one AA, the performance in this area is the basis for the overall rating. The lending test receives more weight than the investment and service tests when arriving at the overall rating. For the lending test rating, we placed more weight on the bank's performance in 2012 through 2013 than its performance in 2014, as it represents the majority of the evaluation period. Additionally, we placed equal weight on the bank's distribution of home mortgages and distribution of small loans to businesses. Within the home mortgage category, we placed greater weight on home purchase loans than home refinance loans. The various weights for the lending test are a function of both the number of loans and identified community credit needs in the AA.

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

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 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.

## Conclusions with Respect to Performance Tests

### LENDING TEST

NBI is rated “High Satisfactory” under the lending test.

### Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the lending test is rated “High Satisfactory”. Based on our full-scope review, the bank’s performance in the Indianapolis MSA AA is good. The overall volume of lending is good. Both the geographic and borrower distribution of loans is adequate. The level and responsiveness in community development lending had a significantly positive impact on the assessment of the bank’s lending performance. The use of flexible loan products also had a positive impact.

### Lending Activity

The overall lending volume in the AA is good. Home mortgage lending is adequate and small business lending is excellent, given the bank’s deposit market share and level of competition for loans. The FDIC Deposit Market Share Report as of June 30, 2014, shows NBI had a deposit market share of 4.35 percent. NBI ranked seventh among the 38 financial institutions in the AA. The bank’s rank is in the top 18.4 percent of total depository banks.

Based on 2014 Peer Mortgage Data, NBI had a 0.7 percent market share of home purchase loans. This ranks the bank 35<sup>th</sup> among 368 reporting lenders, or among the top 9.5 percent of total lenders. For home refinance loans, NBI had a market share of 0.9 percent. The bank’s rank is 25<sup>th</sup> of 321 reporting lenders, or top 7.8 percent of total lenders. The bank’s market share for both home mortgage loan products is below its deposit market share. However, the bank’s ranking as a percentage of total lenders in the AA is above its ranking as a percentage of total depository banks in the AA. The top five lenders collectively had a 30.6 percent market share for home purchase loans and a 28.9 percent market share for home refinance loans. The bank’s home mortgage lending is adequate considering the competition.

NBI had a 2.1 percent market share of small loans to businesses. It ranked 11<sup>th</sup> among the 98 reporting lenders, representing the top 11.2 percent of total lenders. The top five lenders primarily consist of credit card lenders and collectively these lenders had a 56.8 percent of market share. Each of the top five lenders had a high number of loans compared to NBI, but reflected a smaller average loan amount. The average loan size among the top five lenders ranged for \$3,000 to \$89,000, while NBI’s average loan amount was \$230,000. The bank’s small business lending activity is excellent, given the level and nature of competition.

Refer to Table 1, Lending Volume, in Appendix C for the facts and data used to evaluate the bank’s lending activity.

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

The overall geographic distribution of loans is adequate. The geographic distribution of home mortgage loans (home purchase and home refinance) was adequate. The geographic distribution of small loans to businesses was good.

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

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

#### Home Purchase

The overall geographic distribution of home purchase loans is good. The bank's geographic distribution of home purchase loans originated during 2012 through 2013 was good. The percentage of loans in the low-income CTs exceeded the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income CTs was below the percentage of owner-occupied units in these geographies. The bank's market share in low-income CTs exceeded its overall market share for home purchase loans. The bank's market share in moderate-income CTs substantially met its overall market share for home purchase loans.

The bank's performance for 2014 was adequate, which is weaker than the good performance noted during 2012 through 2013. In 2014, the percentage of loans in both the low- and moderate-income CTs was weaker than the respective percentages for 2012 and 2013. The 2014 market share analysis carried minimal weight given the bank's overall market share being less than one percent.

#### Home Refinance

The overall geographic distribution of home refinance loans is very poor. The bank's geographic distribution of home refinance loans during 2012 and 2013 was very poor. The percentage of loans in both low- and moderate-income CTs was significantly below the percentage of owner-occupied units in these geographies. The bank's market share in both the low- and moderate-income CTs was significantly below its overall market share for home refinance loans. However, market share analysis carried minimal weight given the bank's overall market share of less than one percent. The bank's performance for 2014 was not inconsistent with its performance for 2012 through 2013.

#### Multi-Family

The bank did not originate a sufficient number of multi-family loans during 2012 through 2014 to complete a meaningful analysis of the geographic distribution.

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

The overall distribution of small loans to businesses is good. The bank's geographic distribution of small loans to businesses in 2012 through 2013 was good. The percentage of loans made in low-income CTs was near to the percentage of businesses in these geographies. The percentage of loans made in

moderate- income CTs was below the percentage of businesses in these geographies. The bank's market share in the low-income CTs is below its overall market share for small loans to businesses. The bank's market share in the moderate-income CTs exceeds its overall market share for small loans to businesses. The bank's performance in 2014 was not inconsistent with its performance during 2012 through 2013.

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

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

We reviewed summary reports and maps regarding NBI's lending activity over the evaluation period to identify lending gaps in low- and moderate-income geographies. We did not identify any unexplained conspicuous gaps.

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

For the combined three-year period, NBI originated a substantial majority, or 86.1 percent of all loan products, within the bank's AA. By product type, the number of loans made within the AA was 85.1 percent of home mortgage loans and 87.1 percent of small loans to businesses. NBI's inside/outside ratio is a positive characteristic in the overall analysis of the geographic distribution of lending by income level of geography.

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

The overall distribution of loans by income level of the borrower is adequate. The borrower distribution of home mortgage (home purchase and home refinance) was adequate. The borrower distribution of small loans to businesses was adequate.

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

Refer to Tables 8, 9, and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

#### **Home Purchase**

The overall borrower distribution of home purchase loans is excellent. The bank's borrower distribution of home purchase loans during 2012 through 2013 was excellent. The percentage of loans to low-income borrowers was near to the percentage of low-income families. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to both low- and moderate-income borrowers exceeded its overall market share of home purchase loans.

The bank's performance in 2014 was good, which is weaker than its excellent performance during 2012 through 2013. In 2014, the percentage of loans made to low-income borrowers was weaker than the

respective percentage for 2012 and 2013. The 2014 market share analysis carried minimal weight given the bank's overall market share of less than one percent.

### Home Refinance

The overall borrower distribution of home refinance loans is very poor. The bank's borrower distribution of home refinance loans during 2012 through 2013 was very poor. The percentage of loans to low-income borrowers was significantly below the percentage of low-income families. The percentage of loans made to moderate-income borrowers was significantly below the percentage of moderate-income families. The bank's market share of loans to both low- and moderate-income borrowers was significantly below its overall market share. However, the market share analysis carried minimal weight given the bank's overall market share is less than one percent. The bank's performance in 2014 was not inconsistent with its performance for 2012 through 2013.

### *Small Loans to Businesses*

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is adequate. The bank's borrower distribution of small loans to businesses in 2012 through 2013 was adequate. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was significantly below the percentage of small businesses. The bank's percentage of small loans to small businesses is comparable to all reporting lenders in the AA. NBI's average loan to small businesses was larger than that of the top lenders in the AA, which primarily issue credit cards. The bank's market share of loans to small businesses substantially met its overall market share of loans to businesses. The bank's performance in 2014 was not inconsistent with its performance for 2012 through 2013.

## Community Development Lending

Community development lending had a significantly positive impact on lending performance in the AA. During the evaluation period, the bank originated 25 CD loans totaling \$39.9 million, or 30.0 percent of tier 1 capital. The loans were for a variety of CD purposes, including affordable housing, economic development, and community organizations serving low- or moderate-income (LMI) individuals. These loans demonstrated good responsiveness to identified needs in the AA, in particular affordable housing needs. CD loans include:

- \$27.2 million, or 20.5 percent of tier 1 capital, for affordable housing purposes. Affordable housing loans included multifamily units with below market rate rents for LMI individuals, housing that served formerly homeless individuals, and homes for individuals recovering from addictions or struggling with mental illness.
- \$8.6 million, or 6.5 percent of tier 1 capital, for CD organizations serving LMI individuals. Two charter schools, serving LMI students and located in low-income geographies, benefitted from these loans.
- \$4.1 million, or 3.1 percent of tier 1 capital, for economic development purposes. These loans were used to help create jobs through building new businesses in LMI geographies or were used to retain existing jobs in these areas.

The bank made three additional CD loans, totaling \$3.9 million, outside of its AA that targeted LMI individuals or geographies.

Refer to Table 1 Lending Volume in Appendix C 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 multi-family loans, including those that also qualify as CD loans. However, Table 5 does not separately list CD loans.

## Product Innovation and Flexibility

NBI uses flexible lending products to meet the credit needs of LMI individuals in the AA. The use of flexible and innovative products had a positive impact on the bank's lending test performance.

The bank partnered with the Federal Home Loan Bank of Indianapolis in both the Homeownership Opportunities Program (HOP) and the Neighborhood Impact Program (NIP). The HOP program offers a forgivable grant, up to \$10,000, for down payment assistance to borrowers at or below 80 percent of the area median income. The NIP program offers up to \$10,000, to borrowers at or below 80 percent of the area median income, for home rehabilitation. The bank also partnered with Pathfinder Services, in the NeighborhoodLIFT Program, to provide forgivable grants, up to \$15,000, in down payment assistance. The number and dollar amount of loans originated under these programs is included in the totals for home mortgage loans.

The bank offers two homeownership programs requiring low or no down payments for LMI borrowers. The First Step mortgage program offers 100 percent financing and My Community Mortgage program offers a low down payment and reduced or no mortgage insurance for qualified borrowers. The bank also offers a mortgage program for individuals completing their medical residency.

The bank works with borrowers facing foreclosure by modifying loans. The bank modified 27 home mortgage loans, totaling \$2.5 million, to borrowers struggling to stay in their homes. Additionally, the bank has entered into a service participation agreement with the Indiana Housing and Community Development Authority to waive late fees for borrowers assisted by the Hardest Hit Fund. NBI waived late fees for 16 borrowers; the waived late fees totaled \$3,512.

## **INVESTMENT TEST**

NBI is rated “High Satisfactory” under the investment test.

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

The bank’s performance under the investment test is rated “High Satisfactory”. Based on a full-scope review, the bank’s performance in the AA is good.

During the evaluation period, the bank made 291 grants, and donations, totaling \$663,000 in the AA. In addition, three prior period investments with a total book value of \$2.0 million remained outstanding at the end of the evaluation period. Total investments of \$2.7 million in the AA represent 2.0 percent of tier 1 capital.

The bank’s responsiveness to the CD needs in the AA is excellent. Community contacts identified affordable housing and small business lending as credit needs in the AA. Of the \$2.7 million in qualified investments, donations and grants, 57.5 percent went to affordable housing and 20.1 percent were directed toward small businesses. Donations also helped to revitalize/stabilize LMI geographies, supported economic development in Indianapolis, and provided services to LMI individuals.

### **Investments - IN Statewide**

In addition to the CD investments that benefit the bank’s AA, NBI made three qualifying CD investments that had a significant impact on the overall investment performance in the state. The bank made three investments, totaling \$2.9 million, in the broader statewide area that had a purpose, mandate, or function to serve the bank’s AA. When considering these investments, along with all the investments in the bank’s AA, the total dollar amount represented 4.2 percent of tier 1 capital.

Refer to Table 14 in Appendix C for the facts and data uses to evaluate the bank’s level of qualified investments.

## **SERVICE TEST**

NBI is rated “Low Satisfactory” under the service test.

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

The bank’s performance under the service test is rated “Low Satisfactory”. Based on a full-scope review, the bank’s performance is adequate. Retail services carry more weight than community development services in determining the service test rating.

### **Retail Banking Services**

The bank’s branch distribution in the AA is adequate. Branches are reasonably accessible to geographies and individuals of different income levels. Although the bank does not have any branches located in LMI geographies, consideration was given to those branches located within one half mile of LMI geographies. Two branches are located within one half mile of moderate-income CT’s and one is located within one half mile of a low-income CT. No branches were open or closed during the evaluation period.

NBI’s hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly LMI individuals. Services offered and hours of operation are comparable among locations.

NBI maintains 12 full-service ATM’s, one located at each of the 12 branches. The bank complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, telephone banking, and remote deposit capture; these delivery methods provide increased access to banking services throughout all areas in the AA. 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 LMI individuals.

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank’s branch delivery system and branch openings and closings.

### **Community Development Services**

The bank’s performance in providing CD services in the AA is good. In the AA, 37 bank employees provided CD services to 31 different organizations. Twenty-two services involved board or committee membership. The majority of the activities focused on community services that benefit LMI individuals. Services included teaching financial literacy classes, financial counseling, serving on the board of non-profit agencies, and serving on boards and committees of organizations focused on economic development or revitalizing/stabilizing LMI geographies.

## 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): (01/01/12 to 12/31/14) Investment and Service Tests and CD Loans: (07/17/12 to 10/26/15)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
The National Bank of Indianapolis Indianapolis, Indiana	Home Purchase and Home Refinance Loans Small Loans to Businesses	
<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 – Counties that comprise the Assessment Area</b>
Indianapolis MSA AA	Full-scope	A portion of the Indianapolis-Carmel-Anderson MSA #26900 – Marion County and part of Boone County, Hamilton County, and Johnson County

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

### Indianapolis MSA AA

Demographic Information for Full-Scope Area: Indianapolis MSA AA - 2014						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	263	17.49	31.18	27.38	23.95	0.00
Population by Geography	1,169,334	11.65	28.99	27.39	31.97	0.00
Owner-Occupied Housing by Geography	284,182	7.66	22.79	30.39	39.16	0.00
Businesses by Geography	87,887	7.08	22.06	32.91	37.95	0.00
Farms by Geography	1,635	5.44	20.31	29.54	44.71	0.00
Family Distribution by Income Level	281,036	23.87	16.90	18.88	40.36	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	114,574	21.33	40.37	24.23	14.07	0.00
Median Family Income FFIEC Updated Median Family Income for 2014 Households Below the Poverty Level	= \$64,633 = \$67,900 = 13%					
				Median Housing Value Unemployment Rate (December 2014)	= \$148,182 = 5.40%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Sources: 2010 U.S. Census, FFIEC Updated MFI, and Bureau of Labor Statistics.

Demographic Information for Full-Scope Area: Indianapolis MSA AA - 2013						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	263	18.25	31.18	27.76	22.81	0.00
Population by Geography	1,169,334	12.27	28.91	28.37	30.45	0.00
Owner-Occupied Housing by Geography	284,182	8.17	22.97	31.76	37.09	0.00
Businesses by Geography	101,864	7.86	22.13	33.73	36.28	0.00
Farms by Geography	1,827	6.08	20.63	31.80	41.49	0.00
Family Distribution by Income Level	281,036	24.65	17.19	18.99	39.17	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	117,589	21.84	39.95	25.03	13.19	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below the Poverty Level	= \$66,347 = \$65,100 = 13%					
				Median Housing Value Unemployment Rate (December 2013)	= \$148,182 = 6.00%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 U.S. Census, 2013 HUD updated MFI, and Bureau of Labor Statistics

NBI's AA consists of a portion of the Indianapolis-Carmel-Anderson MSA. The MSA consists of 11 counties, while the AA only includes all of Marion County, 26 census tracts in Hamilton County, 10 census tracts in Johnson County, and three census tracts in Boone County. Management believes that due to the size, location of offices, and other area banks, it would not be able to reasonably serve all 11 counties in the MSA. Management also feels that with the size and location of branch facilities, it would be difficult to fully serve all of Hamilton County (39 census tracts), Boone County (10 census tracts), and Johnson County (22 census tracts). Adjusting down from the MSA and county levels is reasonable, given the majority of the branches are located in Marion County. Furthermore, the branches outside Marion County are close to the border.

The AA meets the requirements of regulation and does not arbitrarily exclude LMI geographies. None of the census tracts immediately adjacent to the AA are low- or moderate-income tracts. Only five of the additional 33 census tracts in Hamilton, Boone, and Johnson counties are moderate-income tracts and none are low-income tracts.

The 2014 FFIEC updated Median Family Income (MFI) within the AA was \$67,900. This was a \$1,900 (2.88 percent) increase when comparing this amount to the 2011 HUD updated median family income of \$66,000. Nearly 41 percent of families within the AA have low- or moderate-incomes. Based on the 2010 census, 11 percent of families and 13 percent of households were living below the poverty level.

Competition is significant for financial services within the Indianapolis MSA AA. Per the June 30, 2014, FDIC Deposit Market Share Report, NBI ranks seventh out of 38 depository financial institutions in the AA, with a 4.35 percent market share. Large national and regional institutions present the most competition, as they control a majority of the market share within the AA. This includes JP Morgan Chase, NA (27.70 percent), PNC Bank, NA (19.84 percent), and Fifth Third Bank (10.38 percent), The Huntington National Bank (8.01 percent), and BMO Harris Bank, NA (5.72 percent). All competitors maintain 405 offices in the AA, while NBI operates 12 full-service branches.

### Employment and Economic Factors

Economic conditions within the AA have improved during the performance evaluation period. According to the Bureau of Labor Statistics, the unemployment rate of the Indianapolis MSA decreased from 8.3 percent, as of July 2012, to 4.5 percent, as of June 2015. This is consistent with national and statewide trends. The unemployment rate in Marion County, which represents the significant majority of the census tracts and population within the AA, remains above the Indianapolis MSA unemployment rate at 4.9 percent, as of June 2015. Boone, Hamilton, and Johnson Counties all have unemployment rates lower than the Indianapolis MSA.

Indianapolis is the state capital and the largest city within the state. Indianapolis serves as a primary industrial, commercial, and transportation center for the Midwest. Tourism and conventions are major economic factors for the city. Indianapolis contains a number of government employees, while other leading industries are education, health, professional and business, and social services. The largest employers within the AA include St. Vincent Hospitals, Indiana University Health, Eli Lilly and Co., and Community Health Network.

As part of this evaluation, we considered information from two community contacts for insight on the credit needs and opportunities in the AA. Both contacts were from organizations involved in economic development. Their comments indicate an ongoing need to address various community development issues such as gun violence, job and economic opportunities, education, health and wellness, vacant residential properties, homelessness, and family stability. There is a perceived funding concentration for single-family homeownership, while other community needs are left wanting. One contact felt there were opportunities to help non-profit developers by providing pre-development loans or lines-of-credit. This contact also mentioned opportunities to offer credit-building products or services to the unbanked or underbanked with poor or no credit. The other contact mentioned a fairly decent supply of low-income housing for 50-80 percent of average median income (AMI), but substantial gaps for 30-50 percent AMI. This contact further noted an opportunity to provide banking services to an underserved Hispanic population.

## Appendix C: Tables of Performance Data

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### Content of Standardized 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. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- 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 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 over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies

compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As for guidance on when a bank may receive positive CRA consideration for such investments.

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

**Table 1: Lending Volume**

LENDING VOLUME		Geography: INDIANAPOLIS MSA AA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014				
Assessment Area:	% 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>												
Indianapolis MSA AA	100.00	1,316	323,714	1,440	345,338	1	200	25	39,896	2,757	669,252	100.00

\* Loan Data as of December 31, 2014. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from July 17, 2012 to October 26, 2015.

\*\*\* Deposit Data as of June 30, 2014. 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: INDIANAPOLIS MSA AA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013								
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Owner Occupied Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occupied Units <sup>***</sup>	% BANK Loans	% Owner Occupied Units <sup>***</sup>	% BANK Loans	% Owner Occupied Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Indianapolis MSA AA	564	100.00	8.17	10.82	22.97	16.13	31.76	28.01	37.09	45.04	1.31	7.46	1.20	0.95	1.28

<sup>\*</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> 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 2010 Census information.

<sup>\*\*\*\*</sup> 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: INDIANAPOLIS MSA AA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013						
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	Upp
<b>Full Review:</b>															
Indianapolis MSA AA	1	100.00	8.17	0.00	22.97	0.00	31.76	0.00	37.09	100.00	0.08	0.00	0.00	0.00	0.17

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* 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 2010 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: INDIANAPOLIS MSA AA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Owner Occupied Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occupied Units <sup>***</sup>	% BANK Loans	% Owner Occupied Units <sup>***</sup>	% BANK Loans	% Owner Occupied Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Indianapolis MSA AA	485	100.00	8.17	1.03	22.97	4.95	31.76	15.46	37.09	78.56	0.50	0.11	0.26	0.21	0.79

<sup>\*</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> 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 2010 Census information.

<sup>\*\*\*\*</sup> 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: INDIANAPOLIS MSA AA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013							
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</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	Upp
<b>Full Review:</b>															
Indianapolis MSA AA	7	100.00	14.72	28.57	44.40	28.57	26.80	14.29	14.07	28.57	4.08	12.50	2.78	2.78	5.56

<sup>\*</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> 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 2010 Census information.

<sup>\*\*\*\*</sup> 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 DECEMBER 31, 2013			Geography: INDIANAPOLIS MSA AA								Evaluation Period: JANUARY 1, 2012 TO				
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	Upp
<b>Full Review:</b>															
Indianapolis MSA AA	1,002	100.00	7.86	6.89	22.13	17.17	33.73	35.53	36.28	40.42	2.66	2.10	2.67	2.77	2.70

\* Based on 2013 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 (2013).

**Table 7: Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: INDIANAPOLIS MSA AA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013								
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	Upp
<b>Full Review:</b>															
Indianapolis MSA AA	1	100.00	6.08	0.00	20.63	0.00	31.80	100.00	41.49	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2013 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 (2013).

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

Borrower Distribution: HOME PURCHASE		Geography: INDIANAPOLIS MSA AA								Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					
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 <sup>1</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Indianapolis MSA AA	564	100.00	24.65	19.61	17.19	40.46	18.99	6.24	39.17	33.69	1.53	2.78	2.13	0.55	1.39

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

<sup>1</sup> 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: INDIANAPOLIS MSA AA								Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>2</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Indianapolis MSA AA	1	100.00	24.65	0.00	17.19	0.00	18.99	0.00	39.17	100.00	0.08	0.00	0.00	0.00	0.17

<sup>\*</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

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

<sup>2</sup> 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 DECEMBER 31, 2013		Geography: INDIANAPOLIS MSA AA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013							
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 <sup>3</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Indianapolis MSA AA	485	100.00	24.65	2.69	17.19	5.58	18.99	10.54	39.17	81.20	0.61	0.25	0.19	0.29	0.98

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* 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 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.2% of loans originated and purchased by bank.

<sup>3</sup> 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: INDIANAPOLIS MSA AA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
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>									
Indianapolis MSA AA	1,002	100.00	69.72	36.13	43.11	23.15	33.73	2.66	2.58

\* Based on 2013 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 - 2013).

\*\*\*\* 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 15.57% 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: INDIANAPOLIS MSA AA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
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>									
Indianapolis MSA AA	1	100.00	96.44	0.00	0.00	100.00	0.00	0.00	0.00

\* Based on 2013 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 - 2013).

\*\*\*\* 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 100.0% of small loans to farms originated and purchased by the bank.

**Table 14: Qualified Investments**

QUALIFIED INVESTMENTS		Geography: INDIANAPOLIS MSA AA				Evaluation Period: JULY 17, 2012 TO OCTOBER 26, 2015			
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>									
Indianapolis MSA AA	3	2,000	291	663	294	2,663	48.14	0	0
IN Statewide with P/M/F to serve the AA	1	381	2	2,489	3	2,869	51.86	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 & BRANCH OPENINGS/CLOSINGS Geography: INDIANAPOLIS MSA AA Evaluation Period: JULY 17, 2012 TO OCTOBER 26, 2015																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Indianapolis MSA AA	100.00	12	100.00	0.00	0.00	41.67	58.33	0	0	0	0	0	0	11.65	28.99	27.39	31.97

