



LARGE BANK

Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

**First Bank Richmond, NA
Charter Number: 23570**

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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

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

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

Performance Levels	First Bank Richmond N.A. 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:

Lending Test

- The distribution of FBR’s loans represents an adequate dispersion among businesses of different sizes and home mortgage borrowers of different income levels within the bank’s assessment area (AA).
- An adequate percentage of loans were made within the bank’s AA.
- FBR’s loan volume reflects good responsiveness in meeting the credit needs of the AA.
- The bank’s geographic distribution of loans within the AA is good.
- FBR has an adequate level of community development (CD) loans.

Investment Test

- The bank was found to have a significant level of qualified investments over the evaluation period.
- FBR has demonstrated good responsiveness to credit and community economic development needs within the AA.

Service Test

- FBR’s service delivery systems are accessible to essentially all portions of the bank’s AA.
- The bank provides a relatively high level of CD services in the AA. The bank has demonstrated a leadership role in several CD services.
- The bank’s services do not vary in a way that inconveniences certain portions of its AA, particularly low- and moderate-income geographies and individuals.

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.

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

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 C.F.R. 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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 household 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 or a block numbering area 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 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).

Home Mortgage Loans: Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

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 primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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 more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

Description of Institution

FBR is a full-service intrastate bank headquartered in Richmond, Indiana. As of December 31, 2003, the bank had total assets of \$594 million, deposits of \$397 million, and tier one capital of \$51 million. FBR has two AAs, both located in the state of Indiana. FBR services Wayne County and a portion of Shelby County. Shelby County is part of the Indianapolis Metropolitan Statistical Area (MSA). The AA for Shelby County is comprised of four tracts located in the City of Shelbyville.

FBR is wholly owned by Richmond Mutual Bancorporation, a bank holding company headquartered in Richmond, Indiana. The bank holding company is wholly owned by First Mutual of Richmond, Inc., which is also headquartered in Richmond, Indiana. As of December 31, 2003, First Mutual of Richmond, Inc. reported consolidated total assets of \$708 million.

FBR is a full service financial institution, offering a wide range of products. Loan products include: commercial loans, consumer loans, residential mortgages, and commercial leases. The bank reported net loans and leases of \$438 million at December 31, 2003, or 74 percent of total assets. The loan portfolio comprised of: 37.2 percent of residential first mortgages, 34.4 percent of commercial loans, 22.1 percent of commercial leases, and 6.3 percent of consumer and other loans.

Retail bank services offered by FBR include various savings and checking accounts, money market accounts, certificates of deposit, telephone banking, PC banking, automated bill payer service, and wire transfer service. In June 2003 the bank started to offer trust and investment services.

In total, the bank has eight offices and nine ATMs. The bank operates seven offices and eight ATMs in the Wayne County AA. Six of the seven branch locations have ATMs. Only the Centerville branch does not have an ATM. Two of the eight ATMs in Wayne County are stand-alone ATMs. FBR was ranked first in deposits with a 34.6 percent market share, based on a June 30, 2003 FDIC Deposit Market Share Report for Wayne County.

The bank has one branch office and ATM in the Shelby County AA. FBR opened the Shelbyville branch office in 1999. This branch along with the ATM is located in a grocery store. As of December 31, 2003, this branch office had total deposits of \$20.6 million, which represented only 5.3 percent of the bank's total deposits. FBR was ranked last in deposit market share with a 4.8 percent share for the City of Shelbyville.

FBR was rated "satisfactory" under the large bank performance standards at the last CRA evaluation of January 2, 2001. There are no financial, legal, or other factors at this evaluation that would impede the bank's ability to meet the communities' credit needs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending, Investment, and Service tests is from January 2, 2001 through February 23, 2004. The start of the evaluation period corresponds to the date that the prior evaluation was performed. We analyzed information reported for the Home Mortgage Disclosure Act (HMDA), small loans to businesses, and small farm loans from January 1, 2001 through December 31, 2002. This information was compared to the 1990 U.S. Bureau of the Census demographic data to assist in evaluating the bank's lending performance. We are using 1990 Census information because loan information reported by the bank during this evaluation period was based on 1990 Census information. The review of CD loans, qualified investments, and CD services was evaluated from January 2, 2001 through February 23, 2004.

Data Integrity

Prior to conducting this CRA evaluation, we tested the accuracy of the bank's data. The data tested for accuracy includes information made available to the public in accordance with HMDA and the CRA. Public data includes home mortgage lending, small loans to businesses, and small farm loans. The evaluation also reviewed the accuracy of non-public data for qualified investments, CD services, and CD loans. We found a few isolated errors with the HMDA data and more significant errors with the CRA reporting data. Management did correct these errors prior to this CRA evaluation. The public and non-public information used in this evaluation was deemed to be accurate.

Selection of Areas for Full-Scope Review

Our analysis included full-scope examination procedures for the Wayne County AA. We performed limited scope examination procedures for the Shelby County AA. The bank has one branch office in the Shelby County AA, which was opened in March 1999. This branch office is located in a grocery store. Deposit activity in the Shelby County AA has been minimal. Only 5.3 percent of the bank's total deposits are from this AA. The bank ranked last with only a 4.8 percent deposit market share for the City of Shelbyville. The bank originated only eight loans from within this AA during the two-year evaluation period. This represents less than one percent of the total loans originated by FBR.

Ratings

The bank's overall rating is based on the large bank performance tests and standards. This included the Lending, Investment, and Service tests. This rating is based primarily on those areas that received full-scope reviews. This evaluation only considered the Wayne County AA under the full-scope review. The Lending test is given the most weight in arriving at the overall CRA rating. The Service and Investment tests receive less weight, but are both weighted equally in arriving at the overall CRA rating.

When determining conclusions for the Lending test, loan products are generally weighted according to their relative volume. Under this evaluation, home mortgage and small loans to businesses were given the most weight because of the number and dollar amount of loans granted during the evaluation period. The number and dollar amount of home mortgage and small loans to businesses were similar, and therefore generally received equal weighting. During the evaluation period, the bank made only 33 small loans to farms. No meaningful analysis could be performed given the limited farm lending activity. Farm lending activity did not impact the bank's lending test rating. The bank also granted only four multi-family loans during the evaluation period. Multi-family lending activity received little weight given the limited lending activity. The Investment test considers the volume of qualified investments, responsiveness to credit and community needs, and innovativeness and complexity of these investments. The Service test considers the accessibility of delivery systems to geographies and individuals of different income levels in the AA. The Service test also considers the bank's record of opening and closing of branch offices and providing CD services.

Other

This evaluation took into consideration information derived from members of the local community. We contacted two organizations in the Wayne County AA. This included one organization that provides programs to assist start-up businesses and programs for low- and moderate-income homebuyers. In addition, a realtor in Wayne County was contacted. These interviews disclosed that the general credit needs are being met in Wayne County. One contact communicated that home-improvement loans are a major credit need given the supply of older homes in the Wayne County AA. It was also disclosed that credit counseling is a need in Wayne County AA.

Fair Lending Review

This evaluation found no evidence of illegal discrimination or other illegal credit practices.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Wayne County AA is adequate.

Lending Activity

The volume of FBR's lending activity during the evaluation period is considered good in meeting the community needs of the Wayne County AA. Refer to *Tables 1 Lending Volume* and *1 Other* in **Appendix C** for the facts and data used to evaluate the bank's lending activity.

During the evaluation period, the bank made a total of 1,247, or \$134.9 million, of home mortgage, small business, and small farm loans. This was comprised of 51 percent home mortgage loans, 47 percent small loans to businesses, and 2 percent small loans to farms, based on the number of loans. Among home mortgage loan originations and purchases, home mortgage refinance represented 49 percent, home purchase was 38 percent, home improvement was 12 percent, and multi-family housing was 1 percent.

The bank exhibited good loan volume in light of its market share, ranking among other lenders, and deposit market share. Based on the 2002 peer market share ranking, FBR is an active lender in the AA. FBR market share for refinance loans was 7.1 percent and ranked fourth among lenders, home purchase loans was 10.7 percent and ranked second, and home improvement loans was 27.5 percent and ranked first. FBR ranked first in small business lending with a 27.6 percent market share for 2002. FBR has the highest deposit market share, of 34.6 percent, in the Wayne County AA.

Distribution of Loans by Income Level of the Geography

FBR's distribution of loans by the income level of the geography showed that the bank's performance in the Wayne County AA is good. The geographic distribution of small business loans reflects excellent penetration in the AA and home mortgage loans represents good penetration.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans is good in the Wayne County AA. Home purchase and home refinance loans were weighted greater than home improvement loans based on the loan volume. No meaningful conclusion could be made for multi-family loans given the limited loan activity. 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.

The geographic distribution of home purchase loans is good. The percentage of home purchase loans made in moderate-income tracts (24.9 percent) is comparable to the percentage of owner-occupied units in the moderate-income (25.6 percent) tracts in this AA. FBR market share by geography for the moderate-income tract (10.2 percent) was comparable to its overall market share of (10.7 percent) for 2002. The bank's penetration for low-income geographies (0.4 percent) was below the percentage of owner-occupied units (1.1 percent). However, the penetration was found to be reasonable in light of the fact that a small percentage of owner-occupied homes are located in the one low-income tract in the AA.

The geographic distribution of home refinance loans is reasonable. The percentage of home refinance loans made in the one low-income tract was comparable to the percentage of owner-occupied units in the low-income tract. The bank's market share by geography for the low-income tract (15.8 percent) for 2002 compared favorably to FBR's overall market share of (7.1 percent) for home refinance loans. The percentage of home refinance loans (22.3 percent) made in moderate-income tracts was lower than the level of owner-occupied units (25.6 percent) in the AA, but reflects a reasonable performance. FBR market share by geography for moderate-income tracts (6.2 percent) was slightly below its overall market share of (7.1 percent) for home refinance loans.

The geographic distribution of home improvement loans is adequate. The percentage of home improvement loans made in moderate-income tracts (20.0 percent) is below the percentage of owner-occupied units in the moderate-income (25.6 percent) tracts in this AA. FBR market share by geography for the moderate-income tract (21.1 percent) was below its overall market share of (27.5 percent) for home improvement loans. The bank made no home improvement loans in the one low-income tract in the AA.

The bank granted a minimal number of multi-family loans during the evaluation period. The geographical analysis of multifamily loans is not meaningful based on the limited activity.

Small Loans to Businesses

The geographic distribution of small business loans represents an excellent level of lending performance in the AA. 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.

The percentage of small business loans made in low-income tracts (3.6 percent) exceeds the percentage of small businesses in these tracts (2.5 percent). The percentage of small business loans made in moderate-income geographies (45.9 percent) significantly exceeds the percentage of small businesses in moderate-income tracts (37.9 percent).

FBR ranked first among 32 lenders in the AA for lending to small businesses based on 2002 peer small business data. FBR lending performance for small businesses in low-income geographies (25.6 percent market share) and moderate-income geographies (23.4 percent) compared well with the bank's overall market share of 16.5 percent.

Lending Gap Analysis

We reviewed reports of FBR's home mortgage loans, small loans to businesses, and small loans to farms in the AA to identify gaps in the geographic distribution of these loans. We did not identify any unexplained conspicuous gaps in lending.

Inside/Outside Ratio

An adequate percentage of loans were made in the bank's AA. This is supported by a majority of FBR's loans were made in the AA. During the evaluation period, 82 percent of the bank's small business loans, 58 percent home mortgage loans, and 61 percent of small loans to farms were made within the bank's AA. FBR's inside/outside ratio for home mortgage loans is greatly impacted by the bank's brokered loan department. This department reported 635 loans in 2001 and 598 loans for 2002. The vast majority of loans originated by the brokered loan department are outside the bank's AA.

The inside/outside ratio was performed at the bank level and included both the Wayne County and Shelby County AAs.

Distribution of Loans by Income Level of the Borrower

The distribution of FBR's loans in the Wayne County AA represents an adequate dispersion among business customers of different sizes and home mortgage borrowers of different income levels.

Home Mortgage Loans

FBR's distribution of home mortgage loans to borrowers of different income levels is adequate. 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.

The bank's lending pattern to low-income borrowers is below the percentage of low-income families according to the demographic composition of the AA. The percentage of FBR's home purchase (6.9 percent), home improvement (5.3 percent), and home refinance (7.1 percent) loans to low-income borrowers was below the percentage of low-income families (21.3 percent) living throughout the AA. It was also noted from the 2002 peer mortgage data that FBR's market share for low-income borrowers in these lending categories was below the bank's overall market share. Because it can be difficult for a household with income below poverty level to afford home ownership, the bank could be below the demographic information, but still have a reasonable record of lending to low-income borrowers. Approximately 15 percent of the households were below the poverty level. Our review concluded the bank's lending pattern to low-income borrowers was adequate.

The percentage of FBR's home purchase (15.1 percent) and home refinance loans (17.0 percent) to moderate-income borrowers was below the percentage of moderate-income families (21.5 percent) living throughout the AA. Based on 2002 peer mortgage data, FBR's market share for moderate-income borrowers in these lending categories was below the

bank's overall market share. The percentage of FBR's home improvement loans (26.3 percent) to moderate-income borrowers was above the percentage of moderate-income families (21.5 percent) living throughout the AA. The 2002 peer mortgage data disclosed a good performance level for home improvement lending when comparing the bank's lending to moderate-income borrowers (30.5 percent) to the bank's overall market share (29.6 percent) for this lending category. Overall, this represented an adequate performance of lending to moderate-income borrowers. In considering FBR's home mortgage lending performance, we took into consideration the high level of competition from large banks and non-bank lenders in the AA.

Small Loans to Businesses

FBR's distribution of loans to businesses of different sizes is adequate. 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.

FBR made 68.2 percent of its small business loans to borrowers with revenue of \$1 million or less. Although this is below the demographic information (78.3 percent) of businesses in the AA with revenue of \$1 million or less, lending performance was reasonable. It should be noted that FBR was the top business lender in the AA based on 2002 peer market data. The bank's market share for lending to businesses with revenues of \$1 million or less was 27.6 percent for calendar year 2002. This compared favorably to the bank's overall market share of 16.5 percent. In addition, the bank made 67.7 percent of its business loans in the amount of \$100,000 or less, which reflects the bank's willingness to extend credit in smaller amounts.

Community Development Lending

FBR made an adequate level of CD loans during the evaluation period, which had a small, but positive impact on the overall lending test. 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. Table 5 does not separately list CD loans, however.

The bank granted four loans and four letters of credit that provided affordable housing for low- or moderate-income individuals, which meets the CD loan criteria. This included a \$700,000 loan secured by a low-income housing complex outside the bank's AA, a \$80,000 loan to an organization that assists small businesses and low- and moderate-income people obtain home ownership in the AA, and two loans for a total of \$289,376 that are secured by an apartment complex that provides affordable housing in the AA. The bank granted four letters of credit for \$2.75 million to help facilitate the construction of three low- and moderate-income housing complexes. All of these letters of credit were to housing projects outside the bank's AA. While the bank is given credit for CD loans outside its AA, these loans receive less weight than those loans that directly impact the bank's AA.

Product Innovation and Flexibility

Product innovation and flexibility had a neutral impact on the Lending Test conclusions for the Wayne County AA. While none of FBR's lending programs are considered innovative, the bank does offer some loan products with flexible underwriting criteria. The bank originates indirect mortgage loans through its brokered loan department, where the bank will finance up to 100 percent of the home's loan-to-value.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Shelby County AA is weaker than the bank's overall "low satisfactory" performance under the Lending Test. This was based on the limited loan activity in this AA. The bank originated five home mortgage loans and three small loans to businesses during the evaluation period. However, FBR's low lending levels in this AA had little impact on the overall Lending Test rating. Refer to Tables 1 through 13 in **Appendix C** 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 "High Satisfactory." Based on a full-scope review, the bank's performance in the Wayne County AA is good. Refer to Table 14 in **Appendix C** for the facts and data used to evaluate the bank's level of qualified investments.

FBR made a significant level of qualified investments over the evaluation period. Qualified investments totaled \$1.6 million, of which \$1.1 million was made in the bank's AA. This represents a good volume level in light of the bank's size, resources, and opportunities in the AA. During the evaluation period, FBR invested \$667,372 in qualified investments. This included \$468,453 of additional contributions toward tax credits for Section 42 housing projects, which provides affordable housing for low- and moderate-income individuals. This investment included two apartment complexes, one of which was located in the bank's AA. The bank made a contribution of \$100,000 for the construction of a new facility for the Boys & Girls Club of Wayne County. This organization primarily serves low- and moderate-income families. FBR also made a donation of \$75,000 to a local school scholarship fund. These funds are directed toward children from low- and moderate-income families. The bank made seven other donations totaling \$23,919, to organizations that help to meet the needs of low- and moderate-income individuals and families.

FBR has three prior period investments totaling \$895,782. These three investments involve tax credits for Section 42 housing, which assists low- and moderate-income individuals and families. The bank made additional investments in two of these housing projects during the evaluation period (see above). These tax credits provide equity for the housing projects, which in turn decrease the financing costs as well as the tenants' rent.

The bank also demonstrated innovativeness by participating in the creation of a Homeownership/Housing Counselor position for a local organization (See Service Test). The bank has committed to funding a portion of the salary for this position. The bank committed to funding \$5,000 per year starting in 2004 for three years.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the investment test in the Shelby County AA is weaker than the bank's overall "High Satisfactory" performance under the Investment Test. The bank made no qualifying investments in the Shelby County AA. However, FBR's lack of qualifying investments for this AA did not impact the overall Investment Test rating. FBR has a small presence in this AA with only one branch office that has minimal deposit activity. Refer to Table 14 in **Appendix C** for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Wayne County AA is good.

Retail Banking Services

FBR's service delivery systems are accessible to geographies and individuals of different income levels in the Wayne County AA. 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.

Overall, the bank's branch and ATM network provides accessibility throughout the Wayne County AA. FBR operates six full-service branch facilities and seven ATMs in the Wayne County AA. The bank also operates one motor branch, which is a support facility. The motor bank is a drive-up facility located in a moderate-income census tract. Although customers can only conduct deposit transactions at the motor bank, the main office is only four blocks from the motor branch. The main office is also located in a moderate-income tract.

The distribution of the bank's branch network is comparable to the distribution of the population of the AA. Although the bank has no branches and no ATMs in low-income tracts, only 1.4 percent of the AA's population lives in low-income tracts. It should be noted that the AA has only one low-income tract, and that the bank has two branches and one ATM in upper-income tracts that are directly adjacent to this tract. FBR has 28.6 percent of its branches and 25.0 percent of its ATMs in moderate-income tracts. The branches in moderate-income tracts include the main office and the limited purpose motor branch. This is comparable to the percentage of the population living in moderate-income geographies of 32.2 percent.

Branch hours offer reasonable access and convenience and do not vary in a way that inconveniences any portion of its AA, particularly low- and moderate-income geographies and low- and moderate-income individuals. Lobby hours vary at each location based on the market. Branch offices are open Monday through Saturday between 8:30am to 11:00am with

the exception of the motor branch office, which is open at 7:00am. Branch offices close between 4:00pm and 7:00pm Monday through Saturday. In addition, two branch offices are open on Sunday and the hours are from 1:00pm to 5:00pm. The review found that the bank offers expanded hours equally in the moderate-income tracts compared to the hours in the middle- and upper-income tracts.

The changes regarding opening and closing of branch offices during the evaluation period has not adversely affected the accessibility of FBR's delivery systems, particularly in low- and moderate-income geographies. The bank closed one branch office with an ATM during the evaluation period. This branch office was located in a grocery store in a middle-income tract. The reason for the branch closure was due to the grocery chain decision to close the store. The bank opened a branch office with an ATM during the evaluation period on the North-side of Richmond, which is located in a middle-income tract.

FBR offers a number of alternative delivery systems, which include 24-hour telephone banking to its customers that allows them to check balances, transfer funds, and make loan payments from all income geographies. FBR also offers on-line banking, a computer-based banking service that can be accessed by computer terminals through individuals' homes and businesses in all income areas. Wire transfer services are available. There was no data available to assess these alternative delivery systems in reaching low- and moderate-income geographies and individuals. Therefore, these alternative systems received little weight under the service test.

Community Development Services

FBR provides a relatively high level of CD services in the Wayne County AA. This is supported by the bank's efforts of providing financial expertise to local organizations and assisting local programs directed at low- and moderate-income individuals and families. During the evaluation period, the bank did demonstrate a leadership role in several local organizations and activities. Examples of the bank's participation in CD services Include:

Habitat for Humanity – This organization provides affordable housing for low- and moderate-income individuals and families. Bank employees provide classes for Habitat for Humanity on topics such as budgeting, finance, and credit counseling for first time homebuyers. The bank is also servicing 22 loans for this organization at no cost.

Main Street – This nonprofit organization works to provide economic development and homeownership programs for the people of Richmond and Wayne County. This organization helps to revitalize and stabilize low- and moderate-income areas. This organization oversees three entities, which includes: (1) Urban Enterprise Association, (2) Uptown Innovation Center, and (3) the Homeownership Counselor Program. Bank employees have been very active with Main Street. A Senior Vice President is a Board member and Chairman of the Strategic Planning Committee. A Vice President of the bank also serves as a Board member. The Urban Enterprise Association has a separate board, with a bank employee serving as a Board member. Bank personnel were active in the creation of the Homeownership/Housing Counselor position created by Main Street. This position was created to better assist people in obtaining homeownership. The bank made a commitment to fund a portion of the salary for this position (See Investment Test).

Uptown Innovation Center – This organization was opened in late 2003 and assist new businesses by providing expertise, office space, and equipment at reduced cost. This organization meets the CD service definition by providing services that promote economic development by assisting businesses or farms in financing activities. A Senior Vice-President of the bank played a significant role in the formation of this organization. This Senior Vice President served as Chairman of the Strategic Planning Committee of Main Street, which created this organization. The Uptown Innovation Center is managed by Main Street. In addition, a Vice President of the bank serves in an advisory role in the area of marketing for this organization.

Urban Enterprise Association (UEA) – The UEA oversees State-designated zones in need of investment and redevelopment. The UEA Board manages funds from Inventory Tax Abatements used to revitalize depressed areas. This organization directly assists in the revitalization and stabilization of low- or moderate-income geographies. A Senior Vice President serves as an UEA Board member.

Federal Home Loan Bank (FHLB) Indianapolis – The FHLB designs and implements affordable housing programs for member institutions. The Vice Chairman of the bank is on the FHLB of Indianapolis Affordable Housing Advisory Council and Board of Directors. The Vice Chairman is also on the FHLB finance committee and was a member of the FHLB audit committee during the evaluation period.

Green Acres Agency – This organization works with developmentally and disabled individuals in the community. Green Acres helps to find affordable accessible housing, employment opportunities, and assisting with other quality of life issues. This organization meets the CD service definition by providing community services and affordable housing for low- and moderate-income individuals. The President of the bank was involved in sponsoring a grant request from the FHLB of Indianapolis's affordable housing program for the local Green Acres Agency. This agency was awarded a \$100,088 FHLB grant to build a home to house three developmentally disabled individuals.

Boys and Girls Club of Wayne County – This organization provides various activities to children of Wayne County. This organization provides community services targeted to low- and moderate-income individuals. A majority of the members are from low- and moderate-income families. The President of the bank has provided financial expertise to this organization by assisting in financial planning and fund raising. The bank made a substantial donation to this organization for the construction of a new facility (See Investment Test).

Wayne County Revolving Loan Fund – The Board of Directors of the Wayne County Revolving Loan Fund analyzes and administers funds for business start-up and expansion in Wayne County that create jobs in the area. This organization provides activities that promote economic development by financing businesses or farms. The President of the bank serves as a Board member.

Richmond Redevelopment Commission – This commission funds projects in the city’s Tax Increment Financing (TIF) district. Funds are used to develop areas in low- and moderate-income districts and the Urban Enterprise Zone. This organization meets the CD service definition by helping to revitalize or stabilize low- or moderate-income geographies. A Senior Vice President was a Board member during the evaluation period until January 2004.

Economic Growth Group – This organization is involved in employee training and the rehabilitation of older buildings. This organization helps to revitalize or stabilize low- and moderate-income geographies. The Vice Chairman of the bank is active with this organization.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank’s performance under the Service Test in the Shelby County AA is weaker than the bank’s overall “High Satisfactory” performance under the service test. FBR has only one branch in a middle-income census tract and has had minimal deposit activity in this AA. The bank provided no community development services in the Shelby County AA during the evaluation period. However, FBR’s branch distribution in this AA and CD services did not impact the overall Service Test rating. Refer to Table 15 in **Appendix C** 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 non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/01 to 12/31/02 Investment and Service Tests and CD Loans: 01/02/01 to 02/23/04	
Financial Institution	Products Reviewed	
First Bank Richmond, NA (FBR) Richmond, Indiana	HMDA, Small Business, Small Farm, and Community Development	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Wayne County	Full-Scope	
Shelby County (Indianapolis MSA #3480)	Limited-Scope	

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Wayne County.....	B-2
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Wayne County AA Market Profile

Demographic Information for Full Scope Area: Wayne County Indiana						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	19	5.26	31.58	57.89	5.26	0.00
Population by Geography	71,951	1.43	32.21	58.83	7.53	0.00
Owner-Occupied Housing by Geography	18,650	1.12	25.55	64.91	8.42	0.00
Business by Geography	3,451	2.46	37.87	47.23	12.43	0.00
Farms by Geography	304	0.33	7.24	90.13	2.30	0.00
Family Distribution by Income Level	19,785	21.31	21.50	23.15	34.04	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	8,469	2.50	40.81	51.17	5.51	0.00
Median Family Income		30,800	Median Housing Value	42,136		
HUD Adjusted Median Family Income for 2002		50,300	Unemployment Rate (1990 US Census)	3.55%		
Households Below Poverty Level		14.96%				

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 US Census and 2002 HUD updated MFI

The Wayne County AA, which includes all of Wayne County, consist of nineteen tracts, of which one (five percent) is low income, six (32 percent) are moderate-income, eleven (58 percent) are middle-income, and one (five percent) is upper-income.

The population of this AA is 71,951 people based on the 1990 Census. We are using 1990 Census information because loan information reported by the bank during this evaluation period was based on 1990 Census information. One-percent of the population resides in the low-income tract, 32 percent live in moderate-income tracts, 59 percent live in middle-income tracts, and eight percent reside in upper-income tracts in the AA, based upon the 2002 HUD adjusted Nonmetropolitan Median Family Income of \$50,300. A low-income family has a maximum income of only \$25,149. The percentage breakdown of families in the AA by income level is 21 percent low-income, 22 percent moderate-income, 23 percent middle-income, and 34 percent upper-income. Approximately 15 percent of the households in the AA are living below the poverty level. These factors may make it difficult for low-income individuals to qualify for a home purchase loan.

Of the 29,586 housing units in the AA, 18,650, or 63 percent of the homes are owner-occupied. Approximately one percent of the owner-occupied units are located in the AA's low-income tract. Twenty-six percent of the owner-occupied units are located in moderate-income tracts, 65 percent are located in middle-income tracts, and the remaining eight percent are in upper-income tracts. Thirty percent or 8,937, of housing units are rental-occupied while the remaining 1,999 units (seven percent) are vacant.

Based on business demographic data for the year of 2002 there were 304 farms and 3,451 non-farm businesses in Wayne County. Approximately 97 percent of the farms and 78 percent of non-farm businesses had revenues of \$1 million or less. There are 85 non-farm businesses or 2.5 percent in low-income geographies, 1,307 or 37.9 percent in moderate-income geographies, 1,630 or 47.2 percent in middle-income geographies, and 429 or 12.4 percent in upper-income geographies.

The primary industry in Wayne County is manufacturing. Major employers in the Wayne County AA include: Belden Wire, Cinram, Mosey Manufacturing, Dana Corporation, Masterbrand Cabinets, and Reid Hospital. As of December 2003, Wayne County's unemployment rate was 7.4 percent, compared to 5.0 percent for the state of Indiana, and 5.4 percent nationally.

There is a high level of competition in the Wayne County market area. Based on a June 30, 2003 FDIC Deposit Market Share Report, there are eight commercial banks and two savings and loan institutions with a total of 36 branch offices. This includes four regional financial institutions and six community financial institutions. In addition, the AA is also serviced by a number of credit unions.

We performed two contacts in the Wayne County AA during the examination. These contacts included a realtor and a local based organization that provides various programs to promote local businesses and homeownership. These contacts disclosed that the housing prices in Wayne County are affordable compared to other real estate markets. Major needs of the AA include providing home improvement loans and programs to assist low- and moderate-income individuals and families to achieve homeownership.

Appendix C: Tables of Performance Data

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: 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. 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. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- 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 __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

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.

FIRST BANK RICHMOND

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF INDIANA												
Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002												
MA/Assessment Area (2002):	% 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)	
Full Review:												
Wayne County	99.36	635	56,276	582	77,193	33	1,785	3	369	1,250	135,254	94.79
Limited Review:												
Part of Shelby County	0.64	5	295	3	388	0	0	0	0	8	683	5.21
Regional/Statewide Loans								5	3,451			

* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is From January 01, 2001 to February 23, 2004.

*** Deposit Data as of June 30, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

FIRST BANK RICHMOND

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF INDIANA				Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography *				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Wayne County Indiana	241	100.00	1.12	0.41	25.55	24.90	64.91	53.94	8.42	20.75	10.74	0.00	10.15	9.74	18.70
Limited Review:															
Part of Shelby County Indiana	0	0.00	0.00	0.00	43.57	0.00	56.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2002 Peer Mortgage Data: Central Region.

** 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

FIRST BANK RICHMOND

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: STATE OF INDIANA					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002									
MA/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 Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Wayne County Indiana	80	98.77	1.12	0.00	25.55	20.00	64.91	66.25	8.42	13.75	27.49	0.00	21.05	27.17	50.00	
Limited Review:																
Part of Shelby County Indiana	1	1.23	0.00	0.00	43.57	0.00	56.43	100.00	0.00	0.00	1.20	0.00	0.00	1.92	0.00	

* Based on 2002 Peer Mortgage Data: Central Region.

** 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 housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

FIRST BANK RICHMOND

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: STATE OF INDIANA					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002				
MA/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 Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Wayne County Indiana	310	98.73	1.12	0.97	25.55	22.26	64.91	64.52	8.42	12.26	7.10	15.79	6.20	6.55	13.07									
Limited Review:																								
Part of Shelby County Indiana	4	1.27	0.00	0.00	43.57	25.00	56.43	75.00	0.00	0.00	0.36	0.00	0.30	0.40	0.00									

^{*} Based on 2002 Peer Mortgage Data: Central Region.

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

^{***} Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

FIRST BANK RICHMOND

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															Geography: STATE OF INDIANA					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002				
MA/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	Upp									
Full Review:																								
Wayne County Indiana	4	100.00	0.31	0.00	47.12	75.00	29.98	25.00	22.59	0.00	50.00	0.00	50.00	100.00	0.00									
Limited Review:																								
Part of Shelby County Indiana	0	0.00	0.00	0.00	51.18	0.00	48.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00										

^{*} Based on 2002 Peer Mortgage Data: Central Region.

^{**} Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

^{***} Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

FIRST BANK RICHMOND

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF INDIANA				Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002									
MA/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
Full Review:															
Wayne County Indiana	582	99.49	2.46	3.61	37.87	45.88	47.23	36.43	12.43	14.09	16.50	25.58	23.39	14.60	13.31
Limited Review:															
Part of Shelby County Indiana	3	0.51	0.00	0.00	47.97	33.33	52.03	66.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2002 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 (2003).

FIRST BANK RICHMOND

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: STATE OF INDIANA					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002									
MA/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	
Full Review:																
Wayne County Indiana	33	100.00	0.33	15.15	7.24	0.00	90.13	84.85	2.30	0.00	8.60	100.00	0.00	8.14	0.00	
Limited Review:																
Part of Shelby County Indiana	0	0.00	0.00	0.00	8.82	0.00	91.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2002 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 (2003).

FIRST BANK RICHMOND

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF INDIANA					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Wayne County Indiana	241	100.00	21.31	6.90	21.50	15.09	23.15	25.43	34.04	52.59	12.46	4.52	5.70	14.55	22.45	
Limited Review:																
Part of Shelby County Indiana	0	0.00	21.86	0.00	25.88	0.00	26.48	0.00	25.78	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2002 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 3.73% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

**** 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.

FIRST BANK RICHMOND

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF INDIANA					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002									
MA/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	Upp	
Full Review:																
Wayne County Indiana	80	98.77	21.31	5.26	21.50	26.32	23.15	28.95	34.04	39.47	29.57	17.24	30.51	31.25	32.05	
Limited Review:																
Part of Shelby County Indiana	1	1.23	21.86	100.00	25.88	0.00	26.48	0.00	25.78	0.00	1.22	4.00	0.00	0.00	0.00	

^{*} Based on 2002 Peer Mortgage Data: Central Region.

^{**} As a percentage of loans with borrower income information available. No information was available for 4.94% of loans originated and purchased by BANK.

^{***} Percentage of Families is based on the 1990 Census information.

^{****} 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.

FIRST BANK RICHMOND

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF INDIANA					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Wayne County Indiana	310	98.73	21.31	7.14	21.50	17.01	23.15	30.95	34.04	44.90	7.70	6.48	4.55	8.67	9.66	
Limited Review:																
Part of Shelby County Indiana	4	1.27	21.86	0.00	25.88	50.00	26.48	25.00	25.78	25.00	0.45	0.00	0.97	0.47	0.00	

* Based on 2002 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 5.10% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

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

FIRST BANK RICHMOND

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF INDIANA			Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002				
MA/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
Full Review:									
Wayne County Indiana	582	99.49	78.27	68.21	67.70	15.12	17.18	16.50	27.61
Limited Review:									
Part of Shelby County Indiana	3	0.51	78.51	33.33	33.33	66.67	0.00	0.00	0.00

^{*} Based on 2002 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 - 2003).

^{****} 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 13.50% of small loans to businesses originated and purchased by the bank.

FIRST BANK RICHMOND

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STATE OF INDIANA			Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002				
MA/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 \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Wayne County Indiana	33	100.00	96.71	87.88	90.91	9.09	0.00	8.60	8.57
Limited Review:									
Part of Shelby County Indiana	0	0.00	97.06	0.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2002 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 - 2003).

^{****} 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 12.12% of small loans to farms originated and purchased by the bank.

FIRST BANK RICHMOND

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
		Geography: STATE OF INDIANA				Evaluation Period: January 2, 2001 TO February 23, 2004			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Wayne County Indiana	1	475	10	578	11	1,053	100.00	1	15
Limited Review:									
Part of Shelby County Indiana	0	0	0	0	0	0	00.00	0	0
Regional/Statewide Loans	2	421	1	89	3	510			

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

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

FIRST BANK RICHMOND

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF INDIANA																	
Evaluation Period: JANUARY 2, 2001 TO February 23, 2004																	
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	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Wayne County Indiana	94.79	7	86	0.00	28.57	42.86	28.57	1	1	0	0	0	0	1.43	32.21	58.83	7.53
Limited Review:																	
Part of Shelby County Indiana	5.21	1	14	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	50.50	49.50	0.00