



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act

Performance Evaluation

The First National Bank of Portland
Charter Number: 7180

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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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Description of Institution

First National Bank of Portland (FNB) is a \$111 million intrastate financial institution. The bank operates three branches and three ATMs, all located in Portland, Indiana. The bank has designated all of Jay County as its assessment area. The assessment area meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income areas. For additional information on FNB's assessment area, see Market Profile – Demographic Information Tables in Appendix B.

On April 1, 1999, First Merchants Corporation (FMC) headquartered in Muncie, Indiana, purchased FNB. In addition to this bank, FMC owns nine other community banks as well as an insurance company, a title insurance company, and a trust company. As of December 31, 2002, the holding company had total assets of \$2.7 billion; however, FMC acquired CNBC Bancorp, Columbus, Ohio in second quarter of 2003, which increased total assets by approximately \$300 million. Since yearend 2002, FMC also consolidated the fiduciary activities of its various banks into Merchants Trust Company with total assets of \$1.1 billion as of January 31, 2003.

FNB Portland offers a full array of banking products and services including business, real estate and consumer purpose loans, and various deposit products. As of June 30, 2003, FNB's primary capital was \$9,645,000 (12% of total assets) and net loans accounted for 86% of total assets. The loan portfolio was comprised primarily of one-to-four family residential loans (38%) and commercial loans (27%). An additional 22% of the loan portfolio was farm loans, 10% was loans to individuals, 2% was construction, and 1% was home equity loans. For additional information on the products and services offered by FNB, please refer to the bank's CRA Public File.

There are no legal, financial, or other constraints that could impair the bank's ability to meet the credit needs of the community. The bank's last CRA examination was January 29, 1997 when the bank received an "Outstanding" rating under the small bank CRA standards.

Evaluation Period

The evaluation period for the Lending Test, excluding Community Development (CD) Loans, is January 1, 2000 through December 31, 2002. The evaluation period for the Investment Test, the Service Test, and CD loans is January 1, 2000 (the date the bank became a large bank for purposes of the CRA evaluation) through October 27, 2003 (the starting date of this examination).

Products included in FNB's Lending Test analysis are home mortgage loans, small loans to businesses, small loans to farms, and CD loans. Multi-family loans are not significant products of FNB, so an analysis of these products would not be meaningful.

Overall CRA Rating

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

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

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

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

Due to the fact one-to-four family residential mortgages have consistently represented the largest portion of FNB’s loan portfolio, we gave FNB’s mortgage lending the greatest weight. FNB is not a reporter under the Home Mortgage Disclosure Act (HMDA) and the bank did not have any reports to provide the total number and dollar of loans originated during the evaluation period. Since loan reports did not distinguish between purchase, improvement, or refinance, we sampled 20 home mortgage loans made in its assessment area (AA) in the past two years and based our conclusions on the results of this sample. Both small farm lending and small business lending also represent a significant portion of FNB’s operations and were given consideration in the evaluation. The bank did not make any multi-family loans during this evaluation period. An analysis of the geographic distribution of loans was not considered meaningful since FNB’s assessment area consists of all middle-income BNAs.

The major factors that support this overall rating and conclusions with respect to the performance tests are as follows:

LENDING TEST

Refer to Tables 1 through 11 in Appendix C for the facts and data used to evaluate the bank’s lending.

FNB’s performance under the lending test is rated High Satisfactory. The distribution of loans to low- and moderate-income borrowers is good. The level of lending to businesses and farms of different sizes is adequate. FNB’s flexible loan products provided a limited number of loans to low- and moderate-income individuals.

- FNB’s mortgage lending to low- and moderate-income individuals is good. Loans to moderate-income borrowers accounted for 25% of FNB’s mortgage loans while only 22% of

the AA's families are considered moderate-income. Loans to low-income borrowers accounted for an additional 15% of FNB's mortgage loans while 20% of the AA's families are considered low-income. However, over 10% of the families in the AA are living below poverty level. We considered this factor in analyzing the bank's performance in lending to low-income borrowers.

- Loans to businesses and farms with revenues of less than \$1 million were below the level of businesses and farms with revenues of less than \$1 million in the AA. Loans to farms with revenue less than \$1 million represented 62% of the bank's reportable loans. Loans to businesses with revenues of less than \$1 million represented 54% of the bank's reportable loans. This performance was below the 99% of area farms and 83% of area businesses that had revenues of less than \$1 million. However, for over 36% of the bank's farm loans and 39% of the bank's business loans, revenue information was not available.
- FNB's lending activity is good. The bank's deposit market share in Jay County Indiana is 43%, which compares favorably with its Small Farm loan market share of 38%. The market share for small business loans of 20.52% is adequate. Market share for mortgage loans was not available. The bank is not a HMDA reporter since its AA is a non-MSA area.
- Seventy-nine percent of FNB's loans were made within the Jay County assessment area. This level of performance is adequate.
- Community development lending had a neutral effect on the bank's lending test rating. Although FNB did not make any community development loans, this is considered reasonable in light of the limited opportunity for community development activities in the assessment area and the bank's small size.

INVESTMENT TEST

In evaluating the bank's volume of investments, we considered community development opportunities in the assessment area, as well as the capacity for the local infrastructure to create qualified investments. Opportunities for qualified investments are very limited in Jay County due to the lack of any low- or moderate-income geographies, the existence of only a few community development organizations, and a limited number of financial institutions with access to any significant financial resources. In addition, FNB lacks the expertise to create these opportunities.

Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

The bank's performance under the investment test is rated Low Satisfactory.

- FNB's volume of qualified investments is adequate due to limited opportunities for CD activities in Jay County. The investments consist of several cash donations to various community development organizations amounting to \$21,750. The organizations provided economic development in the county and affordable housing to low- and moderate-income individuals.

SERVICE TEST

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.

The bank's performance under the Service Test is rated Low Satisfactory.

- FNB's offices and retail services are reasonably accessible to individuals of all income levels. FNB operates a main office and two branches in the City of Portland, Indiana. FNB has not opened or closed any branches during this evaluation period. Alternative delivery systems include three ATMs, all located within the City of Portland, and telephone and Internet banking. The bank did not maintain information on how low- and moderate-income individuals and geographies benefited from these alternative delivery services. Therefore, we could not place significant weight on these systems when drawing our CRA performance conclusions.
- FNB's community development services are adequate. Some of FNB's employees are involved with a limited number of community development services in the Jay County AA. One employee is on the finance committee of a local organization that provides affordable housing to low- and moderate-income individuals. Two other employees provide technical assistance to a local economic development organization.

Fair Lending Review

We found no evidence of illegal discrimination or other illegal credit practices.

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): 1/1/2000 to 12/31/2002 Investment and Service Tests and CD Loans: 1/1/2000 to 10/27/2003	
Financial Institution	Products Reviewed	
The First National Bank of Portland (FNB) Portland, Indiana	Home mortgage, small business and small farm loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Jay County Indiana	“Full-Scope”	

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Jay County Indiana	B-2
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Jay County Indiana

Demographic Information for Full-Scope Area: Jay County Indiana						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	7	0.00	0.00	100.00	0.00	0.00
Population by Geography	21,512	0.00	0.00	100.00	0.00	0.00
Owner-Occupied Housing by Geography	6,330	0.00	0.00	100.00	0.00	0.00
Businesses by Geography	1,075	0.00	0.00	100.00	0.00	0.00
Farms by Geography	235	0.00	0.00	100.00	0.00	0.00
Family Distribution by Income Level	6,079	20.18	21.96	27.83	30.02	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	2,562	0.00	0.00	100.00	0.00	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$30,800 = \$50,300 =10.12%	Median Housing Value Unemployment Rate				= \$32,638 =3.05%

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 1990 U.S. Census, and 2002 HUD updated MFI.

FNB operates 3 branches and 3 ATMs in its only AA, Jay County Indiana. There are six banks with eleven offices in this county with FNB having over 43% of the deposits. The major competitor is Union Bank and Trust Company of Indiana, which has four locations and over 28% of the market's deposits. Other competitors include Citizens First State Bank, Old National Bank, and First Bank of Berne, which each has one office in Jay County and approximately 10% of the market's deposits. Pacesetter Bank has a very small presence in this market with only one office and less than 3% of the deposits.

Jay County is a rural county that has a population of 21,786 (based on 1990 census data) with a manufacturing based economy that is considered stable. The main industries are glass, steel, forgings, auto parts, and automobile components. Major employers include Indiana Glass Company, JCI, Inc., and Jay School Corporation. This county is comprised of seven Block Numbering Areas (BNAs), all designated as middle-income.

The HUD Adjusted Nonmetropolitan Statistical Area (MSA) median family income for 2002 for Jay County Indiana is \$50,300. Based on this income, approximately 20% of the families in the assessment area are low-income, 22% are moderate-income, 28% are middle-income, and 30% are upper-income.

One community contact with a representative of an affordable housing organization was performed during this examination. Community credit needs are centered in low-income housing. The contact also indicated there are a limited number of community development opportunities in the area due to its rural nature and lack of low- or moderate-income areas.

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.

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Table 1. Lending Volume

LENDING VOLUME													Geography: JAY COUNTY INDIANA		Evaluation Period: JANUARY 1, 2000 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:																
Jay County Indiana	100.00	20	1,626	302	14,240	318	18,764	0	0	640	34,630	100.00				

Table2 - 4. Geographic Distribution of Home Mortgage Loans

Geographic Distribution: HOME MORTGAGE																Geography: JAY COUNTY INDIANA				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002										
MA/Assessment Area:	Total Home Mortgage 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:																														
Jay County Indiana	20	100.00	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	N/A	N/A	N/A	N/A	N/A															

* 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, 2000 to October 27, 2003.

*** Deposit Data as of June 30, 2002. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

**** Home mortgage loans in our sample originated and purchased in the MA/AA as a percentage of the 20 home mortgage loans sampled.

***** 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.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: JAY COUNTY INDIANA					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Jay County Indiana	0	100.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	N/A	N/A	N/A	N/A	N/A	

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: JAY COUNTY INDIANA					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses****	% BANK Loans	% of Businesses****	% BANK Loans	% of Businesses****	% BANK Loans	% of Businesses****	% BANK Loans						
Full Review:																
Jay County Indiana	302	100.00	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	20.52	0.00	0.00	21.20	0.00	

* Based on 2001 Peer Mortgage Data or Small Business Data, as applicable: US & PR.

** Multifamily loans or small loans to businesses (as applicable) originated and purchased in the MA/AA as a percentage of all multifamily loans or small loans to businesses (as applicable) 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.

**** Source Data - Dun and Bradstreet (2002).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: JAY COUNTY INDIANA				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans					
Full Review:															
Jay County Indiana	318	100.00	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	37.65	0.00	0.00	37.80	0.00

Table 8 - 10. Borrower Distribution of Home Mortgage Loans

Borrower Distribution: HOME MORTGAGE		Geography: JAY COUNTY INDIANA				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share [*]				
MA/Assessment Area:	Total Home Mortgage 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:															
Jay County Indiana	20	100.00	20.18	15.00	21.96	25.00	27.83	35.00	30.02	20.00	N/A	N/A	N/A	N/A	N/A

* Based on 2001 Peer Small Business Data or Mortgage Data (as applicable): US&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 (2002).

**** As a percentage of loans with borrower income information available. No information was available for 5.0% of loans originated and purchased by BANK.

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

***** From our sample, home mortgage loans originated and purchased in the MA/AA as a percentage of the 20 home mortgage loans sampled in the rated area.

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Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: JAY COUNTY INDIANA			Evaluation Period: JANUARY 1, 2000 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:									
Jay County Indiana	302	100.00	82.88	54.30	90.73	4.97	4.30	20.52	36.08

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: JAY COUNTY INDIANA			Evaluation Period: JANUARY 1, 2000 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:									
Jay County Indiana	318	100.00	98.72	61.95	85.85	10.38	3.77	37.65	38.87

* Based on 2001 Peer Small Business Data: US&PR.

** Small loans to businesses or farms (as applicable) originated and purchased in the MA/AA as a percentage of all small loans to businesses or farms (as applicable) originated and purchased in the rated area.

*** Businesses or Farms (as applicable) with revenues of \$1 million or less as a percentage of all businesses or farms, as applicable (Source D&B - 2002).

**** Small loans to businesses or farms (as applicable) with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses or farms (as applicable). No information was available for 39.07% of small loans to businesses and 36.16% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: JAY COUNTY INDIANA									
Evaluation Period: JANUARY 1, 2000 TO OCTOBER 27, 2003									
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:									
Jay County Indiana	01	0	9	22	9	22	100.00	0	0

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: JAY COUNTY INDIANA																	
Evaluation Period: JANUARY 1, 2000 TO OCTOBER 27, 2003																	
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:																	
Jay County Indiana	100.00	3	100	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00

* '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.

