

FEDERAL RESERVE BANK
OF CHICAGO

December 23, 2008

Board of Directors
c/o Mr. William I. Miller
Chairman and Chief Executive Officer
Irwin Union Bank & Trust Company
500 Washington Street
P.O. Box 929
Columbus, IN 47202-0929

Members of the Board:

Enclosed is a copy of the Community Reinvestment Act (CRA) Performance Evaluation for Irwin Union Bank & Trust Company conducted as of **August 25, 2008**. Irwin Union Bank & Trust's performance under the Community Reinvestment Act is **Satisfactory**.

General Description of Rating

Lending levels reflect good responsiveness to assessment area credit needs; a high percentage of loans are made in the assessment area(s); the geographic distribution of loans reflects an adequate penetration throughout the assessment area(s). The institution exhibits an adequate record of serving the credit needs of the most economically-disadvantaged area(s) of its assessment area(s), low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

The discussion of Irwin Union Bank and Trust's CRA performance in this letter supplements the public performance evaluation. To obtain a better understanding of the bank's overall CRA performance, the CRA summary report must be read in conjunction with the public evaluation.

CRA Summary Report

The major factors supporting the bank's rating include the following:

- An adequate level of lending within the bank's assessment areas, particularly the assessment areas in the state of Indiana;

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- An adequate level of distribution of loans to borrowers in census tracts of different income levels overall, good distribution to borrowers in moderate-income census tracts and poor distribution to borrowers in low-income census tracts, with the exception of the Bloomington MSA assessment area in Indiana;
- Good community development lending, particularly in the assessment areas in the state of Indiana;
- An adequate use of innovative and flexible lending throughout the combined assessment areas, particularly the SBA loans programs that are consistent with the bank's focus on meeting the credit needs of small businesses;
- A good level of qualified and responsive investments that are occasionally innovative or complex;
- Generally accessible branch and ATM networks, particularly to low- and moderate-income (LMI) areas and individuals;
- Hours, products and services that are generally responsive and not inconvenient to LMI areas and individuals; and
- A good level of community development services that are responsive to assessment area needs for financial and credit counseling and financial education.

The bank's sale of Irwin Mortgage Company (IMC) negatively impacted the bank's performance in two assessment areas: the Indianapolis MSA and Salt Lake City MSA assessment areas. Discussions about findings for these two assessment areas are included within the Performance Evaluation that accompanies this letter.

Matters Requiring Attention (MRAs)¹

- The bank's record of lending in low-income census tracts overall is considered poor. In addition, while not the main focus of this review, the bank also had a poor record of lending to borrowers with low incomes. The lack of loans originated to borrowers with low incomes and/or businesses with revenues of \$1 million or less, particularly in the assessment areas outside of Indiana, is a concern. If left unaddressed and combined with continued poor lending in low-income census tracts, it could lead to a downgrade in the bank's lending test rating overall.

¹ MRAs are important matters that must be addressed over time to preclude significant issues. The institution's board or senior management must implement corrective measures within a specific period to ensure the long term operation of the organization in a safe and sound and compliant manner. The board of directors and/or senior management is required to provide a written response within 60 days of receipt of this report regarding corrective action plans.

The bank's strategy is to hire seasoned lenders with existing community ties. Bank management may choose to study this practice in light of the weak results in low-income census tracts to determine if additional steps are required to promote lending activity in low-income census tracts. It has been noted that the bank's community development lending and community development investments benefit the individuals within the low-income census tracts sporadically.

- Bank management should review the documentation it prepares to support community development loans. For example, a loan was represented as being within a Tax Increment Financing (TIF) district; however, the loan was disqualified after it was established that the property is located outside of the TIF district. In addition, there were four instances in which loans were reported as community development loans but they should have been reported under HMDA as single-family home loans. These instances represent a general weakness in the bank's data collection and validation process. Bank management is required to enhance existing processes to ensure that data will be accurately and validly presented in the future.

Please refer to Attachment A for the scope of the CRA evaluation and Attachment B for the Violations of Laws and Regulations that were cited during this review.

Under the guidelines for public disclosure of the CRA rating you are required to make the most current CRA performance evaluation available to the public within 30 business days of receipt. The evaluation should be placed in the CRA public file located at the main office and at each branch office. You are encouraged to include any response prepared by your bank in the public comment file along with your public evaluation. If you prepare a response, we request that you send a copy to this Reserve Bank. The format and content of the performance evaluation may not be altered or abridged in any manner. Any use of the CRA rating by the bank must not be misleading in nature. It must clearly represent the fact that the rating or evaluation reflects the institution's CRA performance and not its financial condition. Copies of the performance evaluation and the bank's response should be provided to the public upon request. If you charge a fee, charges should not exceed the cost of reproduction and mailing.

The board should advise us in writing of actions taken to address the Matters Requiring Attention noted in this letter within 60 days. Please describe any corrective action that has been implemented in response to the violations of law that are cited in this report.

Please have an authorized officer sign and return to this Reserve Bank the enclosed form acknowledging receipt of this supervisory letter. The CRA performance evaluation should be reviewed at your next Board of Directors meeting, and that review should be documented in the meeting minutes.

Board of Directors
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December 23, 2008

Questions may be directed to Senior Examiner Orlando Orellano at (312) 322-8490, or to my attention at (312) 322-5843.

Respectfully,



Paulette Myrie-Hodge
Assistant Vice President
Compliance and CRA Examinations
Federal Reserve Bank of Chicago

Enclosures: Appendix A – CRA Scope
Appendix B – Violations of Laws and Regulations

cc: Ms. Marie S. Ameis, Vice President and Senior Analyst, Irwin Financial Corporation
Ms. Rebecca Towne, Chief Risk Officer Irwin Financial Corporation
Mr. Raymond L. Gusky, Vice President Irwin Financial Corporation
Mr. Bradley J. Kime, President, Irwin Union Bank
Mr. Komi Ketedji, Federal Reserve Bank of Chicago
Ms. Janelle Tierney, Indiana Department of Financial Institutions
Board of Governors

APPENDIX A – COMMUNITY REINVESTMENT ACT SCOPE

The bank's CRA performance was evaluated in the context of information about the institution and assessment areas, such as asset size, financial condition, competition, and economic and demographic characteristics. Performance within the designated assessment areas was evaluated using large bank, full-scope examination procedures based on the following performance standards.

The bank designated eleven assessment areas in four states: Indiana (4); Michigan (4); Nevada (2); and Utah (1). Details about each assessment area are discussed in the individual assessment area evaluations included within the performance evaluation. Full-scope reviews were conducted for the following assessment areas: the Columbus, Bloomington and Indianapolis MSAs in Indiana; the Grand Rapids, Kalamazoo and Lansing MSAs in Michigan; the Las Vegas MSA in Nevada; and the Salt Lake City MSA in Utah. Limited-scope reviews were conducted for the following assessment areas: the non-MSA assessment area in Indiana; the non-MSA assessment area in Michigan; and the Carson City MSA in Nevada. The bank's assessment areas have not changed since the previous examination.

The analyses were conducted to evaluate the bank's level of compliance with the Community Reinvestment Act (CRA) --

Geographic and Borrower Distribution: The 2006 and 2007 CRA-reportable loans to small businesses and HMDA data were reviewed to determine the distribution of the bank's loans to its assessment areas, within geographies of different income levels within its assessment areas and to borrowers of different income and revenue levels. HMDA data originated by IMC prior to its sale, from January 1, 2006 to June 30, 2006, was also reviewed for distribution among geographies of different income levels within the assessment areas and to borrowers of different income and revenue levels. The bank also originated loans to small farms reported under the data reporting requirements of the Community Reinvestment Act; the loans were relatively few in number and were not reviewed for the purposes of this evaluation.

Community Development Lending: Qualified community development loans originated in 2006 and 2007 were reviewed to determine the amount, complexity and innovativeness of the bank's community development lending efforts in response to community development credit opportunities.

Investments: Qualified investments and grants were reviewed to determine the amount, complexity and innovativeness of the bank's investments, their responsiveness to credit and community development needs and the degree to which qualified investments are not routinely provided by private investors.

Services: The bank's office locations, hours, products and services offered as well as the locations of its automated teller machines were reviewed to determine the level of accessibility the bank has to the individuals and businesses within its assessment areas, particularly, the individuals and businesses from low- or moderate-income census tracts. The bank's record of opening and closing branch offices and ATMs was also reviewed. Community development services performed in 2006 and 2007 were reviewed for responsiveness to the community development needs of the individuals and businesses within the bank's assessment areas.

Information obtained from discussions with fourteen representatives of the bank's assessment areas were considered in the overall evaluation. Bank data was also compared to relevant market aggregates, demographic and economic data where available.

APPENDIX B – VIOLATIONS OF LAWS AND REGULATIONS

Regulation C – Home Mortgage Disclosure

203.4(a) Compilation of Loan Data 4 instances

A financial institution shall collect data regarding applications for, and originations and purchases of, home-purchase loans, home-improvement loans, and refinancings for each calendar year.

The bank included four loans in the aggregated community development loans. However, they should have been reported in the HMDA data as single-family home loan purchases instead of community development loans. The four loans were the following: #702190520, #702207270, #702074109, and #702304470.

Bank management acknowledged the reporting errors. Management is required to enhance HMDA and CRA data collection and reporting procedures to ensure it is accurately reported in the future.

PUBLIC DISCLOSURE

August 25, 2008

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Irwin Union Bank and Trust Company
RSSD# 130943

500 Washington
Columbus, Indiana

Federal Reserve Bank of Chicago

230 South LaSalle Street
Chicago, IL 60604-1413

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, nor should it 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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INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: "SATISFACTORY"

The following table indicates the performance level of Irwin Union Bank and Trust Company with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	NAME OF FINANCIAL INSTITUTION		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	
Low Satisfactory	X		X
Needs to Improve			
Substantial Noncompliance			

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

The bank performance under the Community Reinvestment Act is considered Satisfactory based primarily on an overall adequate level of lending within its assessment areas, a relatively high level of community development lending that reflects increases in both number of loans and dollars committed over the prior period review, a significant level of qualified and responsive investments that are occasionally innovative or complex, reasonably accessible branch and ATM networks, particularly among LMI areas and individuals and an adequate level of community development services that are responsive to assessment area needs for financial and credit counseling and financial education.

INSTITUTION

DESCRIPTION OF INSTITUTION

Headquartered in Columbus, Indiana, Irwin Union Bank and Trust (IUBT) is a commercial bank operating in four states. As of March 31, 2008, the bank had total assets of approximately \$5.3 billion. It is a subsidiary of Irwin Financial Corporation, also based in Columbus, Indiana, and which had assets of approximately \$6.0 billion as of March 31, 2008.

Irwin Union Bank and Trust Company has offices and operates within the following four states: Indiana (home state); Michigan; Nevada; and Utah. The following table identifies the institution's assessment areas, office and automated teller machine (ATMs) locations, and the percentages of CRA-relevant lending.

Irwin Union Bank and Trust Company Columbus, Indiana Assessment Areas					
Assessment Area	County(ies)	Branch Locations	Automated Teller Machines	Percentages of CRA Relevant Lending	
				HMDA*	CRA-SB
Indiana				91.3	60.6
Columbus MSA	Bartholomew	7	13/ 11 full service 2 cash only	49.1	13.3
Bloomington MSA	Monroe	1	1 full service	5.8	8.9
Indianapolis MSA	Boone, Brown, Hamilton, Hancock, Hendricks, Johnson, Marion, Morgan, Shelby	6 Johnson (2) Hamilton (1) Hendricks (1) Marion (1) Shelby (1)	7 full service	23.3	28.7
Non-MSA	Decatur, Jackson, Jennings	2 Decatur (1) Jackson (1)	2 full service	13.1	9.8
Michigan				7.0	29.3
Grand Rapids MSA	Kent Portions of Ottawa County (214.00, 215.00, 216.01, 216.03, 216.04,	1 (Kent)	0	2.1	7.3

Irwin Union Bank and Trust Company Columbus, Indiana Assessment Areas					
	217.00, 218.00, 219.00, 230.00)				
Kalamazoo MSA	Kalamazoo	1	1 full service	2.8	8.9
Lansing MSA	Clinton, Eaton, Ingham	1 (Ingham)	1 full service	1.0	8.4
Non-MSA	Benzie, Grand Traverse, Kalkaska, Leelenau	1 (Grand Traverse)	1 full service	1.1	4.7
Nevada				1.7	6.8
Carson City MSA	Carson City	1	1 full service	0.2	2.3
Las Vegas MSA	Clark	1	0	1.5	4.5
Utah				0.08	3.1
Salt Lake City MSA	Salt Lake	1	1 full service	0.08	3.1
Totals		23 offices	26 full service/2 cash only	100.0	100.0
Note: CRA-relevant lending is defined as loans collected and reported under the Home Mortgage Disclosure Act (HMDA) and loans to small businesses collected and reported under Regulation BB which implements the Community Reinvestment Act. * Excludes affiliate – originated loans described below.					

Based on the data in the preceding table, Indiana communities received the majority of home loans originated by the institution; specifically, the Columbus MSA represented 49.0 percent of the bank’s residential real estate lending. The bank’s lending to small businesses had a more even distribution among the four states in which it operates, although Indiana communities continued to represent the majority of the small business loans.

Irwin Union Bank & Trust Company is structured as a full-service financial institution with a primary business focus on commercial banking. Formerly, the bank operated two subsidiaries, Irwin Mortgage Corporation (IMC) and Irwin Home Equity (IHE), through which it served consumer home lending needs. However, during the third quarter of 2006, the bank sold its remaining interest in IMC which was based in Fishers, Indiana. It continues to operate IHE which is based in San Ramon, California. For the purposes of this review, the bank elected to have the loans originated by IMC during the first six months of 2006 evaluated. It has chosen not to have the loans originated by IHE considered.

Currently, IUBT is primarily engaged in commercial banking operations with IHE responsible for refinancings and junior liens. Other types of credit, as well as investment, trust and insurance services are also available to consumer and corporate customers. The bank maintains an interactive website that allows customers, and potential customers, to apply for both deposit and credit products on-line, access their accounts, pay bills and transfer funds between accounts.

IUBT holds a major share of the market within the Columbus MSA (Bartholomew County) where it is based. Its competition within this market comes from branch offices of several large banking organizations including National City Bank, HomeFederal Bank (now known as Indiana Bank and Trust Company) and Fifth Third Bank. Within the larger metropolitan areas of Michigan, the bank's primary competitors include the offices of larger, nationally-known banking operations such as Bank One, Charter One, and Fifth Third Bank. Bank of America and Wells Fargo provide most of the competition within Nevada while First Utah Bank and Bank of America are the main competitors in Utah.

The bank has the ability to meet the credit needs of the businesses and residents of its assessment areas consistent with its financial condition and size, product offerings and locations and with the economic conditions of the assessment areas it serves.

SCOPE OF EXAMINATION

The bank designated 11 assessment areas in four states: Indiana (4); Michigan (4); Nevada (2); and Utah (1). Details about each assessment area are discussed in the individual assessment area evaluations included within this document. Full-scope reviews were conducted for the following assessment areas: the Columbus, Bloomington and Indianapolis MSAs in Indiana; the Grand Rapids, Kalamazoo and Lansing MSAs in Michigan; the Las Vegas-Paradise MSA in Nevada; and the Salt Lake City MSA in Utah. Limited-scope reviews were conducted for the following assessment areas: the non-MSA assessment area in Indiana; the non-MSA assessment area in Michigan; and the Carson City MSA assessment area in Nevada. The bank's assessment areas have not changed since the previous examination. Unless otherwise stated the review period for this examination was January 1, 2006 to December 31, 2007.

Commercial real estate and commercial non real estate loans originated and reported under the CRA were reviewed to determine the bank's level of lending within its assessment area, the dispersion of loans throughout its assessment areas, including low- and moderate-income geographies and for distribution among borrowers with varying income and revenue levels. Loans for home purchase, improvement and refinance originated and reported under the HMDA were also reviewed for level of lending within the assessment areas, and geographic and borrower distribution. Home purchase, refinance and improvement loans originated by Irwin Mortgage Corporation between January 1, 2006 and June 30, 2006 were also reviewed for geographic dispersion within the assessment area, and borrower distributions. Community development loans were reviewed for number, amount, complexity and innovativeness.

Qualified investments and grants were reviewed to determine the amount, complexity and innovativeness of the bank's investments, their responsiveness to credit and community development needs and the degree to which the qualified investments are not routinely provided by private investors.

The bank's office locations, hours, products and services offered as well as the locations of its automated teller machines (ATMs) were reviewed to determine the level of accessibility the bank has to the individuals and businesses within its assessment areas, particularly, the individuals and businesses from low- or moderate-income census tracts. The bank's record of opening and closing branch offices and ATMs was also reviewed. Community development services performed by the bank were reviewed for responsiveness to the community development needs of the individuals and businesses within the bank's assessment areas.

Information obtained from discussions with 14 representatives of the bank's assessment areas were considered in the overall evaluation. Bank data was also compared to relevant market aggregates and demographic and economic data where available.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's rating on the lending test is "low satisfactory" which is a reduction from the

prior examination when the bank's rating was "high satisfactory." This rating is based primarily on adequate loan distribution by income level of the census tracts for all full-scope review assessment areas and a relatively high level of community development loans. The assessment areas within the state of Indiana received the greatest weight for this review period; the lending test rating for the state of Indiana is "high satisfactory." However, concerns about lending levels in low-income census tracts in all assessment areas outweighed the overall positive performance in Indiana. The bank's lending in moderate-income census tracts is good, overall and excellent in some assessment areas. The bank's community development lending is considered good overall. The bank makes limited use of innovative and flexible loan programs to serve LMI areas and borrowers, and small businesses.

Lending Activity

The bank's level of lending since the previous examination declined from 4,511 loans to 4,398 loans; however, the decline is attributed to the change in the bank's focus from residential real estate lending to commercial lending. Loans to small businesses rose between examinations from 2,554 to 2,896. The bank's level of lending is considered good.

The bank's residential real estate lending decreased significantly from the period covered by the previous review (2004 and 2005) to this period. The decrease is primarily attributed to the sale of IMC, discussed previously, and the institution's focus on commercial real estate lending. For the period under review, 2006 and 2007, two-thirds of the loans originated directly by the bank were loans to small businesses. Not included in this data are the bank's community development loans.

The bank chose to use loan data generated by IMC from the first six months of 2006. IMC was sold during the third quarter of 2006 and the data reviewed for this examination represents loans originated over 25.0 percent of the period covered by this evaluation. There is no expectation that Irwin Union Bank and Trust will engage in home lending on the scale demonstrated by the number and volume of loans originated during the first six months of 2006 through IMC. Given this circumstance, the loans originated by IMC generally received less weight than the loans originated by the bank directly; however, loans originated in the Indianapolis assessment area in Indiana and

the Salt Lake City assessment area in Utah were considered mitigating because of the significant volume of lending IMC did in both of these assessment areas. The bank's rating under the lending test is primarily based on its performance in originating loans to small businesses in accordance with the requirements of Regulation BB and its community development lending. The only exception was the Columbus MSA assessment area in Indiana where the bank engages in residential real estate lending directly and originated more home loans than loans to small businesses over the period under review. For this assessment area, the bank's residential real estate lending carried more weight.

Summary of Total Lending Activity				
Loan Type	#	%	\$	%
HMDA home purchase	708	--	107,5999	--
HMDA refinancings	555	--	92,239	--
HMDA home improvement	130	--	6,339	--
HMDA multifamily	17	--	44,498	--
Total HMDA-related	1,410	32	250,675	27
Total Small Business	2,896	66	666,684	72
Total Small Farm	92	2	11,960	1
TOTAL LOANS	4,398	100.0	929,319	100.0

Note: Affiliate loans include only loans originated or purchased within the bank's assessment areas.

The following table presents total lending by review category for each of the assessment areas that received a full-scope review. The results of the full-scope reviews were used as the basis for the ratings assigned to the bank by state and overall.

Irwin Union Bank & Trust Company Assessment Areas Subject to Full-Scope Reviews								
Full Scope Reviews	2006-07 Residential Real Estate Lending		2006-07 CRA-Reportable Loans to Small Businesses		2006-07 Community Development Lending Combined		Total Lending Combined	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)
IN Bloomington	76	14,671	228	51,556	8	6,756	308	72,983
IN Columbus	643	81,113	342	84,378	9	2,548	994	168,039
IN Indianapolis MSA	305	41,928	738	194,034	19	17,420	1,062	153,382
MI Portions of the Grand Rapids MSA	28	3,970	187	43,796	0	0.00	215	47,766
MI Kalamazoo	36	5,136	229	39,247	3	2,397	268	46,780
MI Lansing	13	9,438	217	38,311	5	6,167	235	53,916
NV Las Vegas	20	6,214	117	34,762	2	9,721	139	50,697
UT Salt Lake City	1	98	84	27,754	1	5,476	86	33,329
Totals	1,122	162,568	2,142	513,838	47	50,486	3,309	626,892
Note: The residential real estate totals do not include IMC data for the first six months of 2006.								

Based on loans originated by the bank in the full review assessment areas, loans in Indiana accounted for 91.0 percent of the HMDA-reportable residential real estate loans. The Columbus MSA assessment area represented the single largest share of HMDA-reportable residential real estate loans; the bank's headquarters are located in Columbus. The bank originated 61.0 percent of its CRA-reportable loans to small businesses in its assessment areas within Indiana; the Indianapolis assessment area received the largest share of the loans to small businesses within the Indiana assessment areas and of the full-scope review assessment areas overall. Small business lending dominated the bank's efforts in every assessment area except the Columbus MSA assessment area in Indiana. Therefore, significant weight has been placed on the bank's small business lending, in general, and within the Indianapolis assessment area, specifically.

The bank also participated in loan programs offered through the U.S. Small Business Administration (SBA) during the period under review. In 2006, the bank originated 54 loans totaling \$15,068,500. The loans were primarily originated within the bank's assessment areas. In 2007, the bank originated 71 SBA loans totaling \$27,674,550. This is part of the bank's efforts to serve the small business communities within each of its assessment areas.

Assessment Area Concentration

The bank's origination of loans within its assessment areas is considered excellent. The bank originated the substantial majority of its loans by number and dollar within its assessment areas for the period under review as shown in the following table. By product, the lone exception was the bank's multi-family lending. The majority of the loans for multi-family housing were originated within the combined assessment areas; however, the majority of the dollars were originated outside the combined assessment areas. The bank does not originate a significant level of this type of loan and the dollar amounts involved were relatively low. Please see Core Table 1: Lending Volume, for additional information about assessment area lending.

LENDING INSIDE AND OUTSIDE THE ASSESSMENT AREA								
	Inside				Outside			
	#	%	\$ (000s)	%	#	%	\$ (000s)	%
HMDA home purchase	672	94.9	94,559	87.9	36	5.1	13,040	12.1
HMDA home improvement	124	96.9	5,599	97.0	4	3.1	175	3.0
HMDA multifamily	18	66.7	10,621	18.8	9	33.3	45,737	81.2
HMDA refinancings	505	92.3	71,463	88.3	42	7.7	9,481	11.7
Total HMDA-related	1,319	93.5	182,242	72.7	91	6.5	68,433	27.3
Total small business	2,573	88.3	586,201	87.9	323	11.2	80,483	12.1
Total small business-related	2,573	88.8	586,201	87.9	323	11.2	80,483	12.1
Total Small Farm-related	87	94.6	11,700	97.8	5	5.4	260	2.2
TOTAL LOANS	3,979	90.5	780,143	83.9	419	9.5	149,176	16.1

Note: Affiliate loans not included.

The following table presents the bank's loan originations by reportable category – residential real estate and small business – compared to households and small business populations – and by the bank's assessment areas. This data allows the reader to see the

degree of variance in the presence of both households living below the poverty level and small businesses within the assessment areas served by the bank.

The rate of households living below poverty level is a useful tool within the assessment areas that have no low- or moderate-income areas. The Columbus MSA assessment area where the bank is based has no low-income census tracts; however, a substantial portion of its families have low and moderate incomes, 17.6 percent and 19.7 percent, respectively. Families who live below the poverty level total 1,200, and represent 5.9 percent of the families in this assessment area. For this assessment area, it also makes the borrower distribution more relevant.

Similarly, borrower distribution received greater weight in the Non-metro assessment areas in Indiana and Michigan, the Carson City MSA and Nevada assessment area. These three assessment areas all received a limited review for this evaluation.

Irwin Union Bank & Trust Columbus, Indiana Loans Originated 2006-07* By Assessment Area												
Assessment Area/Scope	HMDA Originations				CRA-Reportable Loans to Small Businesses				# of Hholds	#/% of Hholds Below Poverty Level		# of Small Bus.
	2006		2007		2006		2007					
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)				
IN Non-MSA/Limited	91	8,604	80	7,612	133	18,958	118	17,976	35,701	3,178	8.9%	3,278
IN Bloomington MSA/Full	40	6,684	36	7,987	113	26,600	115	24,956	46,939	2,213	7.9%	4,451
IN Columbus MSA/Full	301	33,660	342	47,453	169	40,128	173	44,250	27,958	8,857	18.9%	2,471
IN Indianapolis MSA/Full	143	20,267	162	21,661	366	99,761	372	94,273	582,949	48,344	8.3%	55,298
State of Indiana	575	69,215	620	84,713	781	185,447	778	181,455	693,547	62,592	9.0%	65,498
MI Grand Rapids MSA/Full	18	2,687	10	1,283	98	24,113	89	19,683	237,843	18,960	8.0%	25,680

Irwin Union Bank & Trust Columbus, Indiana Loans Originated 2006-07* By Assessment Area												
MI Kalamazoo/Full	24	3,727	12	1,409	133	24,089	96	15,158	93,495	10,799	11.6%	9,115
MI Lansing MSA/Full	6	1,876	7	7,562	110	18,082	107	20,229	172,525	19,157	11.1%	17,224
MI Non-MSA/Limited	6	1,839	8	1,069	59	11,585	62	10,513	51,839	3,511	6.8%	8,259
State of Michigan	54	10,129	37	11,323	400	77,869	354	65,583	555,702	52,427	9.4%	60,278
NV Carson City/Limited	1	417	1	133	34	7,255	25	6,076	20,237	1,856	9.2%	3,189
NV Las Vegas/Full	7	2,122	13	4,092	51	14,713	66	20,049	512,714	48,851	9.5%	54,568
State of Nevada	8	2,539	14	4,225	85	21,968	91	26,125	532,951	50,707	9.5%	57,757
UT Salt Lake City/Full	1	98	0	00	45	14,879	39	12,875	295,290	22,754	7.7%	38,617
All Combined	63 8	81,981	671	100,26 1	1,3 11	300,163	1,2 62	286,038	2,077,4 90	188,48 0	9.1%	222,15 0
Sources of Demographic Data: 2000 Census and Dun & Bradstreet * Does not include IMC loans.												

The following table illustrates the effect of the IMC loans from the first half of 2006 on the lending performance of the bank overall. As can be seen from this data, the most significant lending took place within the Indianapolis MSA and the Salt Lake City MSA assessment areas. Both of these assessment areas were subject to full-scope reviews for this evaluation. Excluding the Indianapolis MSA, the markets in Indiana received very little benefit from the activities of IMC; the bank originated the majority of its residential real estate loans directly. Accordingly, the sale of IMC had minimal impact on those markets. Within the Michigan markets, the bank's level of residential real estate lending was depressed with the addition of the IMC loans and remained depressed following the sale of IMC. The assessment areas in Nevada received some benefit from the lending of IMC while the Salt Lake City assessment area in Utah received considerable benefit.

Irwin Union Bank & Trust Columbus, Indiana HMDA-Reportable Originations 2006-07										
Assessment Area/Scope	Bank Loans 2006		IMC Loans 2006		Total 2006 Loans Combined		Bank Loans 2007		Total HMDA-Reportable Originations 2006-07*	
	#	\$	#	\$	#	\$	#	\$	#	\$
IN Non-MSA/Limited Review	91	8,604	28	2,355	119	10,959	80	7,612	199	18,571
IN Bloomington MSA/Full Review	40	6,684	12	1,155	52	7,839	36	7,987	88	15,826
IN Columbus MSA/Full Review	301	33,660	41	4,704	342	38,364	342	47,453	684	85,817
IN Indianapolis MSA/Full Review	143	20,267	933	104,859	1,076	125,126	162	21,661	1,238	146,787
State of Indiana	575	69,215	1,014	113,073	1,589	182,288	620	84,713	2,209	267,001
MI Grand Rapids MSA/Full Review	18	2,687	10	1,203	28	3,890	10	1,283	38	5,173
MI Kalamazoo MSA/Full Review	24	3,727	45	6,421	69	10,148	12	1,409	81	11,557
MI Lansing MSA/Full Review	6	1,876	16	2,592	22	4,468	7	7,562	29	12,030
MI Non-MSA/Limited Review	6	1,839	14	432	20	2,271	8	1,069	28	3,340
State of Michigan	54	10,129	85	10,648	139	20,777	37	11,323	176	32,100
NV Carson City/Limited Review	1	417	1	177	2	594	1	133	3	727
NV Las Vegas										

Irwin Union Bank & Trust Columbus, Indiana HMDA-Reportable Originations 2006-07										
MSA/Full Review	7	2,122	106	22,651	113	24,773	13	4,092	126	28,865
State of Nevada	8	2,539	107	22,828	115	25,367	14	4,225	129	29,592
UT Salt Lake City MSA/Full Review	1	98	360	58,949	361	59,047	0	0.00	361	59,047
All Combined	638	81,981	1,566	205,498	2,204	287,479	671	100,261	2,875	387,740
* Includes 2006 IMC loans.										

Geographic and Borrower Distribution

The bank's performance under this criterion is considered adequate based on the distribution of small business loans within census tracts of different income levels, including moderate-income census tracts in the assessment areas subject to full-scope review, and residential real estate loans in the Columbus MSA assessment area. The bank's record of lending to businesses in low-income census tracts of the Indy-Carmel MSA and the Grand Rapids MSA assessment areas is considered poor. The bank's overall poor loan distribution within the low-income census tracts of the assessment areas subject to a full-scope review contributed to the reduction of the bank's overall lending test rating from "high satisfactory" to "low satisfactory." The specifics of the bank's lending in each assessment area, and relevant demographic and mitigating factors, if applicable, are discussed under the individual assessment area sections of the report.

The bank's level of originations in the low-income census tracts of the Indianapolis MSA assessment area is considered poor, in part, because the bank's office is proximate to the largest cluster of low-income census tracts in the MSA, which is located in the heart of the city of Indianapolis. In addition the cluster of 12 low-income census tracts that surround the bank's office are home to over 900 businesses, making it likely that lending opportunities existed during the period under review. The bank's record of lending within the identified census tracts was slightly mitigated by the residential real estate lending conducted by IMC which benefited borrowers in the low- and moderate-

income census tracts of the Indianapolis MSA assessment area in the first half of 2006; IMC activity did not carry more weight because the bank did not replace the IMC activity through its direct lending operations and has no plans to do so.

The bank's record in the Grand Rapids MSA assessment area is considered poor based on the lack of lending to businesses in low-income census tracts and community development loans that impacted the census tracts; the bank's record is not mitigated by economic factors within the low-income census tracts during the period under review. The bank's record in the Las Vegas-Paradise MSA assessment area is considered adequate overall, although concerns regarding the lack of lending in low-income census tracts exist. The concerns are mitigated by the bank's community development lending which directly impacted efforts to revitalize and stabilize LMI areas within the assessment area.

Within the Bloomington MSA assessment area, there are three low-income census tracts and the bank originated a total of 48 loans to small businesses within the tracts. The bank provided the loans to businesses within a designated Enterprise Zone. The zone was established to revitalize the city center of Bloomington. Within the bank's Columbus MSA assessment area, the bank's record of originating residential real estate and business loans in census tracts of different income levels was considered excellent; there are no low-income census tracts within this assessment area. The bank's performance in these two assessment areas also contributed to its overall rating.

The bank's record of originating residential real estate loans within low- and moderate-income census tracts is considered adequate based on the level of lending within the moderate-income census tracts. Lending to borrowers from low-income census tracts is considered poor. Within the low-income census tracts of the combined assessment areas, 59 percent of the housing units are rental. This bears directly on the opportunities to purchase a home in these areas, reducing the opportunities overall. With the exception of the bank's lending record in the Columbus assessment area, the bank's residential real estate lending did not receive significant weight in assigning an overall CRA rating.

Borrower Distribution

The bank's level of lending to businesses by the revenue level of the business was considered adequate overall and good in some markets. The details for each assessment area have been provided in the individual assessment area sections. The bank's distribution by borrower revenue level did not receive significant weight in assigning an overall rating.

Based on data from 2006 and 2007, the bank's record of meeting the housing credit needs of LMI individuals/borrowers within its assessment areas in Indiana was excellent during the period under review and considered good overall. The bank's record outside of Indiana, where residential real estate lending is an ancillary line of business, is adequate. The bank's complete record of lending to borrowers by income level of the borrower has been included within the Core Tables found in the appendices to this document. While the bank's record of lending to borrowers by income level of the borrower has been taken into consideration, greater weight has been placed on the bank's distribution of loans among geographies of different income levels.

Community Development Lending

The bank originated 60 community development loans throughout 10 of its 11 assessment areas, totaling \$56,708,047 for the period under review. The loans financed affordable housing, revitalization and stabilization activities, community services and economic development throughout the bank's communities. The level of community development lending overall is considered good. However, the bank did not originate any community development loans within its Grand Rapids MSA assessment area. Details and concerns about the bank's performance within specific areas have been included in the individual assessment area sections.

The bank's community development lending during the period under review increased both in number and dollar over the amount approved during the previous review period (2004-05). For the 2004-05 review period, the bank originated 51 loans totaling \$37.8 million. For the 2006-07 review period, the bank originated 60 loans totaling \$56.7 million, representing an increase by number of 17.6 percent and an increase by dollar of 50.0 percent. In light of the challenging economic conditions in several of the bank's assessment areas, this is considered a very good level of community development lending.

INVESTMENT TEST

The investment test rating for Irwin Union Bank and Trust is “high satisfactory.” The bank made a significant level of qualified investments during this evaluation period. The bank’s qualified investments totaled \$22,692,537, an increase of \$3,188,322 or 16.4 percent from the previous evaluation period. In addition, the bank had unfunded commitments totaling \$1,771,299. Of the investments, \$5,154,427 represented new investments, \$16,630,525 represented ongoing investments from prior periods, and \$907,585 represented donations and grants.

Qualified investments included significant use of innovative and complex investment programs. The majority of the qualified investments were for affordable housing projects using low-income housing tax credits (LIHTC). These investments helped subsidize the creation or maintenance of over 1,500 affordable housing units. The majority of the bank’s donations and grants went to organizations that provide services to LMI individuals and families.

The bank’s level of qualified investments represents good responsiveness to the community development needs of its assessment areas. Several community representatives throughout the bank’s assessment areas listed affordable housing as a significant need.

SERVICE TEST

The bank’s performance under the service test is rated “high satisfactory.” Specific details of the service performance are discussed under each assessment area.

Retail Services

Products, services, alternative delivery systems, hours and accessibility considered in the evaluation of the bank’s services are similar in each assessment area; therefore, only a limited description will be provided with the discussion of each assessment area. The bank’s retail delivery systems are reasonably accessible to all portions of the assessment

areas.

The record of opening and closing banking offices has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals. During the period under review, the bank relocated one of its Columbus bank branch offices located in a moderate-income census tract to a location within a few blocks of the former location. The new branch office location remains within the same moderate-income census tract. Also, since the previous examination, the bank no longer maintains an ATM ("Ready Machines") at the Knauf Corporation which was located at a plant facility that was for employee use only in Shelby, which is in the Indianapolis MSA.

Branch office, lobby and drive-up hours are consistent within the IUBT network regardless of whether it is located in a low-, moderate-, middle- or upper-income census tract. Generally, lobby hours on Monday through Friday are 8:30 am to 4:30 pm, varying by 30-60 minutes. Drive-up hours are typically 9:00 am to 4:30 pm; however some locations maintain extended hours. Additionally, within the state of Indiana, 11 of 15 branch offices are open on Saturdays from 9:00 am to 12:00 pm; two of the 15 branch offices are located in moderate-income census tracts.

As of December 31, 2007, there were 23 offices, 18 full-service ATMs ("Ready Machines") and seven cash-dispensing ATMs located within the combined assessment areas. The bank operated one branch office (4.35 percent) and one full-service ATM (5.6 percent) in low-income geographies; low-income geographies comprise 4.6 percent of the total census tracts in all assessment areas and 2.2 percent of families reside within the census tracts. The bank operated four branch offices (17.4 percent), four full-service ATMs (22.2 percent) and two cash-dispensing ATMs (22.2 percent) in moderate-income geographies; moderate-income geographies comprise 22.0 percent of the total census tracts in all assessment areas and 19.3 percent of families reside within these census tracts.

The bank offers a variety of conventional and government-sponsored loan products, various deposit accounts, and several options for cash management, investment, and insurance services, all designed to meet the needs of its customer base. The bank rebates up to \$50 per month of nonproprietary ATM fees for all deposit customers,

including low- and moderate-income customers that use a branch outside of the Columbus MSA. The ATM rebate is not offered in the Columbus MSA because the bank maintains 13 ATMs, including two cash-only machines, within this assessment area. This assessment area is comprised of one county and it has more ATM locations than any of the other assessment areas.

The bank does not generally offer products/programs specifically targeted to low- and moderate-income individuals, on an enterprise-wide basis. It does, however, make available a few products/programs within specific markets. These products/programs will be discussed under the relevant assessment area.

The bank also has the following alternative delivery systems:

- Ready Access Line is a toll-free automated phone line that allows IUBT customers to access information on their deposit and loan accounts. This 24-hour service also allows customers to transfer funds between accounts.
- Irwin Union Customer Contact Center is the bank's centralized support hub which is set up to accept telephone calls from customers from all IUBT markets. The contact center staff personally answers questions for customers regarding their account balances, recent deposits, loan payments and can also transfer funds for depositors over the phone.
- ReadyNet Internet Banking allows bank customers to access their accounts via the internet (www.Irwinunion.com). Customers can transfer funds, make loan payments, bank online, check account balances, view images of cleared checks, initiate wire transfers, etc. The website also permits individuals to apply for mortgage loans.
- Micro Bank (Corporate Capture) was rolled out in the spring of 2006 and allows a small business (with check volumes of less than 100 items per day) to scan items on site for immediate electronic transmittal and deposit by the bank.
- Master Money Card is an ATM card that allows customers access to funds in their accounts, to deposit, verify, and transfer funds, and access to use services wherever MasterCard is accepted.
- Bank by Mail is a system that allows customers to conduct certain transactions (deposits, loans, check orders) by mailing them to local branch offices.
- Courier Services are made available to all business customers in all assessment areas with door-to-door pick up and assistance with financial transactions.

Community Development Services

The bank provides an adequate level of community development services to various organizations within its combined assessment areas. The majority of community development services are performed by the leadership of the bank, particularly within the state of Indiana. During the period under review, there were a total of 124 instances where the bank participated in community development service activities for a total of 6,166 hours. Although the number of instances and hours dedicated to these activities increased overall since the previous examination, the bank's performance in some assessment areas was considered poor. The community development services demonstrated the bank's leadership in reaching out to LMI members of the community. Two significant examples of qualified community development services are listed in the following:

- Homeownership Opportunities Program Reserve (HOP) – The HOP, which is administered through the Federal Home Loan Bank of Indianapolis (FHLBI), assists low- and moderate-income homebuyers by providing up to \$5,000 in down payment assistance. In 2007, the bank was awarded \$54,000 in HOP Reserve Funds which assisted homebuyers in the Nevada and Indiana markets.
- FHLBI Affordable Housing Program – The FHLBI program awards funding subsidies to help finance the acquisition, construction, or rehabilitation of properties for use as affordable housing. IUBT sponsored four nonprofit organizations who received \$1.7 million in grants for multi-family rental projects located within the state of Indiana.

A complete list of community development services has not been included due to its size. A list of examples of qualified community development services is included in the discussion of the bank's performance within each assessment area that received a full-scope review; in some assessment areas, the level of provision of community development services was too limited to include examples.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank's policies, procedures and articulated lending standards were reviewed for compliance with federal fair lending laws and regulations, including the Equal Credit Opportunity Act (ECOA) and the Fair Housing Act (FHC). No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

STATE – INDIANA

CRA RATING FOR THE STATE OF INDIANA¹:

The Lending Test is rated: High Satisfactory.

The Investment Test is rated: High Satisfactory.

The Service Test is rated: High Satisfactory

The bank's rating for the state of Indiana is "Satisfactory" based on its record of originating commercial real estate and non real estate loans to small businesses throughout its MSA-based assessment areas, including the moderate-income census tracts: However, weaknesses were noted in the bank's lending to businesses and residents in low-income census tracts of the Indianapolis MSA. The bank's level of community development lending, measured by both number and dollars, is good. The bank's qualified investments were occasionally innovative and complex and they were responsive to the community development needs of the assessment areas. The bank's branch and ATM networks are reasonably accessible to all portion of the assessment area, including low- and moderate-income areas. Community development services in number and quality, were responsive to the needs of LMI households within the bank's assessment areas.

SCOPE OF EXAMINATION

Full-scope reviews were conducted for the Columbus MSA, Bloomington MSA and Indianapolis MSA assessment areas within the state of Indiana. A limited-scope review was conducted for the activities within the Non-Metro counties within Indiana. The data reviewed included the bank's 2006 and 2007 residential real estate loans and loans to small businesses collected under the Home Mortgage Disclosure Act and the Community Reinvestment Act, respectively. Residential real estate loans originated by

¹For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

IMC during the first half of 2006 and reported under the HMDA were also reviewed. Community development loans originated during 2006 and 2007 were reviewed for responsiveness to community development credit needs. Qualified investments made in 2006 and 2007 were reviewed for number, amount, innovativeness and complexity. The bank's branch office and ATM networks were reviewed for accessibility to the assessment areas, including low- and moderate-income areas; products and services offered were reviewed for applicability to LMI areas and households/individuals; and hours and community development services were reviewed for responsiveness to LMI households/individuals.

Although loan data from 2006 was reviewed, the evaluation presents 2007 data only. This data accurately reflects the pattern of the bank's lending within its assessment areas.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN INDIANA

The majority of Irwin Union Bank & Trust's (IUBT's) operations are in the state of Indiana. The bank operates 16 branch offices including the main branch office in Columbus, 14 full-service ATMs, and nine cash-only ATMs. According to the June 30, 2007 FDIC Market share report, IUBT ranks eighth of 209 institutions with a 2.2 percent market share of the state's FDIC-insured institutions. As of the June 30, 2007 FDIC market share report, \$2.0 billion or 71.4 percent of the bank's deposits are located in Indiana.

The population for the state of Indiana based on the US Census Bureau 2007 estimates are 6,345,289 which represent a slight increase from the previous year's estimate of 0.7 percent.

Unemployment for the state decreased slightly from 4.9 percent in 2006 to 4.5 percent in 2007; this was slightly higher than the national rate of 4.6 percent in 2006 but slightly lower than the 2007 rate of 4.6 percent.

The areas served by the bank in the state of Indiana encompass 308 census tracts, based upon 2000 census data. Of these census tracts, 26 or 8.4 percent are designated as low-income, 85 or 27.6 percent as moderate- income, 137 or 44.5 percent as middle-income

and 59 or 19.2 percent as upper-income; one census tract was excluded from any further analysis because of its limited number of households.

The assessment area includes counties that are primarily in the central portion of the state. During the review period, the bank operated in three metropolitan areas: Columbus; Indianapolis; and Bloomington. The assessment areas also include three non-metropolitan counties: Jackson; Jennings; and Decatur. Exhibit 1 provides additional demographic information for the bank's combined assessment areas in the state of Indiana.

Exhibit# 1								
Assessment Area Demographics Combined Indiana Assessment Areas								
Income Categories	Tract Distribution		Families by Tract Income		Families Below Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	29	7.8	16,858	3.6	4,822	28.6	85,931	18.6
Moderate-income	92	24.7	89,335	19.3	11,552	12.9	85,333	18.4
Middle-income	178	47.8	239,770	51.8	10,273	4.3	107,486	23.2
Upper-income	72	19.4	116,899	25.3	2,285	2.0	184,112	39.8
Unknown	1	0.3	0	0.0	0	0.0	0	0.0
TOTALS	372	100.0	462,862	100.0	28,932	6.3	462,862	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	40,077	11,573	2.5	28.9	20,936	52.2	7,568	18.9
Moderate-income	167,300	75,517	16.2	45.1	74,418	44.5	17,365	10.4
Middle-income	377,231	249,272	53.6	66.1	103,398	27.4	24,561	6.5
Upper-income	166,057	129,065	27.7	77.7	28,730	17.3	8,262	5.0
TOTALS	750,665	465,427	100.0	62.0	227,482	30.3	57,756	7.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Under \$1 million		Over \$1 million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2,286	3.9	1,916	3.9	268	4.0	102	4.5
Moderate-income	9,483	16.2	7,916	16.0	1,220	18.2	347	15.3
Middle-income	30,497	52.0	25,794	52.0	3,437	51.3	1,266	55.8
Upper-income	16,289	27.8	13,979	28.2	1,764	26.3	546	24.1
Unknown-income	41	0.1	21	0.0	13	0.2	7	0.3
TOTALS	58,596	100.0	49,626	100.0	6,702	100.0	2,268	100.0
Percentage of Total Businesses:				84.7		11.4		3.9

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

The bank's performance in the state of Indiana is considered good overall. The conclusions drawn about the bank's performance were based on its lending, investment

and service activities during the two-year period under review (2006-07), pertinent demographic characteristics and relevant economic conditions. Also considered were the bank's strategic goals within its Indiana assessment areas, branch/ATM locations and competitive factors.

LENDING TEST

The bank's performance under the lending test for the state of Indiana is considered good on the strength of the bank's lending to households and businesses within moderate-income census tracts, its use of SBA loan programs to accommodate smaller businesses, and its community development lending which was tailored to meet the specific needs of each of the assessment areas reviewed. The bank's business lending in low-income census tracts, particularly within the Indianapolis MSA assessment area, is considered poor. Significant weight was given to this concern in determining the bank's rating for the overall lending test.

Lending Activity

The bank's level of lending was considered adequate for its assessment areas in the state of Indiana. The bank originated 1,195 residential real estate loans totaling \$153.9 million and 1,559 loans to small businesses totaling \$366.9 million within the state of Indiana for the period under review. When residential mortgage loans originated by IMC are included, the bank had a total of 2,209 HMDA-reportable loans totaling \$267 million in its assessment areas within Indiana.

The bank's lending within Indiana represented 91.3 percent of total HMDA-reportable loans and 84.5 percent of the total dollars originated for residential real estate loans; with IMC loans included, the proportion of the combined HMDA-reportable loans originated within Indiana represented 76.8 percent of the loans and 68.9 percent of the dollars originated. The bank's loans to small businesses in Indiana represented 60.6 percent of its small business lending and 62.6 percent of the dollars lent to small businesses. During the period covered by the prior examination, the bank had 6,021 HMDA-reportable loans, including loans from IMC, totaling \$745.2 million and 1,616 CRA-reportable loans to businesses totaling \$357 million.

The change between the prior review period and the current review period's residential real estate lending is based on three factors: the sale of IMC; the bank's decision to focus on its commercial lending rather than residential real estate lending; and the downturn in the home lending market that affected lending levels across institutions and assessment areas. The decrease of 57 loans to small businesses between evaluation periods is not considered significant.

The bank is an active lender under the programs offered through the U.S. Small Business Administration; in 2006 it originated 16 loans totaling \$2,870,100 in its assessment areas within the state of Indiana. The bank also originated one loan totaling \$501,600 within Indiana but outside of its assessment areas within the state. In 2007, the bank originated 33 loans totaling approximately \$11.0 million within the bank's assessment areas. The bank also originated two SBA loans outside its assessment areas, but within Indiana, for a total of \$607,500.

Geographic and Borrower Distribution

The distribution of the bank's loans by income level of the geography in which the loan was originated and the income or revenue level of the borrowers is considered adequate and excellent, respectively, based on the pattern of distribution in the assessment areas subject to full-scope reviews. The following tables summarize the bank's lending within low- and moderate-income census tracts and to low- and moderate-income borrowers and small businesses based the data reported to the federal financial supervisory agencies under the Home Mortgage Disclosure Act (HMDA) and the Community Reinvestment Act (CRA). Within the sections of this report for each individual assessment area, the bank's complete record of loan distribution by tract and borrower income or revenue level is presented and discussed in more detail. The bank's lending distribution is also presented in the Core Tables included in the appendices to this evaluation.

Irwin Union Bank & Trust Company Columbus, Indiana Residential Real Estate Loans Reported Under HMDA By Tract Income Level (Dollars are in Thousands)												
Assessment Area	2006				2007				Combined Total			
	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$
State of Indiana Combined	5	1,526	52	3,472	4	1,888	53	4,391	9	3,414	105	6,886
Bloomington MSA	5	1,526	3	224	3	1,767	5	394	8	3,293	8	618
Columbus MSA	0	0	32	1,533	0	0	28	2,619	0	0	60	4,152
Indianapolis MSA	0	0	17	1,715	1	121	20	1,378	1	121	37	3,093
Note: The Non-MSA Indiana assessment area which is comprised of Decatur, Jackson and Jennings counties does not have any low or moderate income census tracts.												

Irwin Union Bank & Trust Company Columbus, Indiana Loans to Small Businesses Reported Under the CRA By Tract Income Level (Dollars are in Thousands)												
Assessment Area	2006				2007				Combined Total			
	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$
State of Indiana Combined	26	9,014	118	27,099	30	7,358	100	25,489	56	16,372	218	52,588
Bloomington MSA	27	6,739	12	1,692	20	7,244	21	3,599	47	13,983	33	5,291
Columbus MSA	N/A	N/A	49	13,020	N/A	N/A	28	2,619	N/A	N/A	77	15,639
Indianapolis MSA	3	619	39	10,777	6	1,770	40	10,055	9	2,389	79	20,832
Note: The Non-MSA Indiana assessment area which is comprised of Decatur, Jackson and Jennings counties does not have any low or moderate income census tracts. Also, the Columbus MSA assessment area does not have any low-income census tracts.												

Irwin Union Bank & Trust Company Columbus, Indiana Residential Real Estate Loans Reported Under HMDA By Borrower Income Level (Dollars are in Thousands)												
Assessment Area	2006				2007				Combined Total			
	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$
Indiana Combined	75	4,929	113	8,480	67	4,856	116	10,470	142	9,785	229	18,950
Bloomington MSA	0	0	4	284	1	66	5	338	1	66	9	622
Columbus MSA	54	3,595	46	3,745	38	2,880	65	6,247	92	6,475	111	9,992
Indianapolis MSA	15	1,024	35	2,552	20	1,546	33	2,728	35	2,570	68	5,280
Non-MSA Indiana	6	310	28	1,899	8	364	13	1,157	14	674	41	3,056

Irwin Union Bank and Trust Company Columbus, Indiana Loans to Small Businesses Reported under the CRA By Borrower Revenue Level (Dollars are in Thousands)												
Assessment Area	2006				2007				Combined			
	Loans to Businesses		Loans to Businesses w/Rev of \$1mm or less		Loans to Businesses		Loans to Businesses w/Rev of \$1mm or less		Loans to Businesses		Loans to Businesses w/Rev of \$1mm or less	
	#	\$	#	\$	#	\$	#	\$	#	\$	#	\$
Indiana Combined	781	185,447	443	87,766	778	181,455	435	85,581	1,559	366,902	878	173,347
Columbus MSA	169	40,128	79	11,642	173	44,250	79	14,657	342	84,378	158	26,299
Bloomington MSA	113	26,600	57	13,091	115	24,956	64	13,627	228	51,556	121	26,718
Indianapolis MSA	366	99,761	215	53,716	372	94,273	222	50,624	738	194,034	437	104,340
Non-MSA Indiana	133	18,958	92	9,317	118	17,976	70	6,673	251	36,934	162	15,990

With the exception of the Columbus MSA assessment area, the bank's lending to small businesses received the greatest weight when drawing conclusions about the bank's performance within each assessment area. The Columbus MSA assessment area had a higher level of residential real estate lending, resulting in greater weight being given to the residential real estate lending for this assessment area. This was the only assessment area where residential real estate lending received greater weight than the bank's lending to small businesses.

The bank's performance in the state of Indiana carried significant weight in assigning the overall rating for the lending test. The Indianapolis MSA assessment area carried a significant amount of weight in the Indiana rating and the overall rating based on the level of the bank's small business and community development lending within this assessment area and the level of credit and community development needs within the MSA as measured by the presence of LMI areas and populations. The Columbus MSA assessment area also received a significant amount of weight based on the deposit market share that the bank has within this assessment area and its level of residential real estate lending. The Columbus MSA assessment area by most measures has a greater level of affluence than the Indianapolis MSA assessment area and, therefore, did not receive as much weight as the Indianapolis MSA assessment area in assigning an overall rating.

Community Development Loans

The bank originated 38 community development loans totaling \$27.9 million in the state of Indiana during 2006 and 2007. The loans funded community services, affordable housing, and revitalization and stabilization activities in the areas served by the bank and in broader regional areas that include the bank's assessment area. The bank's record of originating community development loans within the state of Indiana is considered good.

INVESTMENT TEST

The investment test performance for the Indiana assessment areas is considered good. The bank made a significant level of qualified investments during this evaluation

period. The bank's qualified investments totaled \$12,092,286, an increase of \$1,019,740 or 9.2 percent from the prior evaluation period. The bank also had unfunded commitments totaling \$294,973 in the state. Of the bank's investments in the state of Indiana, \$3,335,143 were new investments, \$7,994,102 were ongoing investments from prior periods, and \$763,042 were donations and grants.

Qualified investments included significant use of innovative and complex investment programs. The bank invested in several projects that used LIHTCs to fund construction of or the maintenance of affordable housing and to subsidize the down payment and closing costs for LMI borrowers. The bank also invested in mortgage-backed securities comprised of loans to LMI borrowers and in a fund whose proceeds were used to finance loans to businesses located in LMI census tracts. The majority of the donations are to organizations that provide services to LMI individuals and families.

The bank's level of qualified investments represents good responsiveness to the community development needs within its assessment areas in the state of Indiana. Community representatives mentioned affordable housing and job creation as needs in the Indiana assessment areas.

SERVICE TEST

The bank's overall service performance in the Indiana assessment areas is considered good.

Delivery services are readily accessible to essentially all portions of the bank's Indiana assessment areas. As of December 31, 2007, the bank had a total of 16 branch offices within the Indiana assessment areas, one in a low-income census tract, two in moderate-income census tracts, 11 in middle-income census tracts and two in upper-income census tracts. The number of branch offices in the Indiana assessment areas represents 70.0 percent of all branches, and 19 percent of the branches in the Indiana assessment areas are in low- or moderate-income geographies.

The bank also had 14 full-service ATMs in the Indiana assessment areas: one in a low-income census tract; two in moderate-income census tracts; 10 in middle-income census tracts; and one in an upper-income census tract. The bank had nine cash-dispensing

ATMs in the Indiana assessment areas: two in moderate-income census tracts; four in middle-income census tracts; and three in upper-income census tracts. ATMs in low- and moderate-income geographies represent 24.4 percent of the ATMs in the Indiana assessment areas.

The percentage of branch offices (18.8 percent) and ATMs (24.4 percent) within the low- and moderate-income census tracts was somewhat lower than the percentage of families living in the LMI areas (22.9 percent) for branch distribution and slightly higher than the percentage of families for ATM distribution.

IUBT has not opened or closed any branch offices since the prior examination in July 2006. In February 2007, it relocated the State Street branch office, in Bartholomew County, within a few blocks of the former location. The branch office is now referred to as the Creekview Branch. Both offices are located within the same moderate-income census tract. A cash-dispensing ATM remains at the former State Street branch office location. Additionally, the ATM located in Knauf Corporation which is located in a middle-income census tract in the Indianapolis MSA assessment area was closed in October 2006. This ATM was situated in a plant and was originally to be used solely by the plant employees.

The bank's record of opening and closing branch offices has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies or individuals. Also, services do not vary in a way that inconveniences any portion of the Indiana assessment areas, including low- and moderate-income geographies or individuals.

With the exception of the Indianapolis MSA, the bank provides a relatively high level of community development services to various organizations within the state of Indiana's combined assessment areas. There were a total of 63 instances where the bank participated in community development service activities for a total of 1,354 hours.

For the most part, bank leadership displayed the highest degree of involvement within the state. Activities focused primarily on community services targeted to low- and moderate-income individuals. Bank staff served on non-profit organizations' boards of directors and/or committees where they used their financial/banking expertise by

working on budgets or grant processes. There were a limited number of community development services that focused on affordable housing, activities that promote economic development by financing businesses or small farms or activities that revitalize or stabilize low or moderate-income geographies. A sample of qualified community development services is included in the discussion of the bank's performance within each assessment area that received a full-scope review.

METROPOLITAN AREAS

DESCRIPTION OF INSTITUTION'S OPERATIONS IN BLOOMINGTON, INDIANA

IUBT operates one branch office and one ATM within this assessment area, both located in a low-income census tract. The branch office in this assessment area represents 4.3 percent of the bank's branch offices. As of June 30, 2007, the bank is ranked ninth of 17 financial institutions in the MSA, with a 5.3 percent deposit market share. (www.fdic.gov).

The assessment area is comprised of the Bloomington MSA and encompasses Monroe County. The estimated 2006 population for the MSA is 176,793 people which is an increase from the 2000 census data of 120,563. The largest city within the assessment area is Bloomington, Indiana. The 2006 estimated median family income increased from the 2000 Census data 13.1 percent to \$53,180 from \$46,989. Approximately 23.0 percent of the assessment area population or 11.0 percent of families were considered to live below the poverty level. Based on the 2000 census data, there are 24,931 families, 17.3 percent and 16.9 percent of which are low and moderate income, respectively.

According to the 2006 estimated census data, there were 82,000 housing units, of which 19.0 percent were vacant. This is an increase of 61.0 percent from 2000 where there were 50,846 housing units. The median housing value for the assessment area is \$119,000. The affordability ratio for this area is 0.45. An area with a high ratio generally has less affordable housing than an area with a low ratio (see glossary for definition of the ratio). Compared to the nearby Columbus and Indianapolis MSAs, whose affordability ratios are 0.49 and 0.44 respectively, homes are less affordable than Columbus but slightly more affordable than Indianapolis.

The economy in the Bloomington MSA is heavily reliant on the University of Indiana, located in Bloomington, while other top employers include Otis Elevator – United Technologies, and Cook, Inc. Other significant occupations include management and professional at 35.0 percent and sales and office at 22.0 percent.

The state of Indiana identified the downtown Bloomington, Indiana, as an enterprise zone. Enterprise zones are areas that have either a high amount of unemployment or business facilities that are not being used to their full capacity. Areas designated as enterprise zones allow certain tax deductions, credits and other incentives for businesses to locate or expand in the identified area.

The unemployment rate in the assessment area decreased from 5.2 percent in 2005 to 4.6 percent and 4.2 percent in 2006 and 2007. Exhibit 2 provides additional demographic information for the Bloomington MSA assessment areas in the state of Indiana.

Exhibit# 2								
Assessment Area Demographics Bloomington MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families Below Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	10.3	645	2.6	231	35.8	4,320	17.3
Moderate-income	4	13.8	2,910	11.7	598	20.5	4,201	16.9
Middle-income	13	44.8	13,179	52.9	618	4.7	5,255	21.1
Upper-income	9	31.0	8,197	32.9	324	4.0	11,155	44.7
TOTALS	29	100.0	24,931	100.0	1,771	7.1	24,931	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	4,973	196	0.8	3.9	4,428	89.0	349	7.0
Moderate-income	7,326	2,120	8.4	28.9	4,690	64.0	516	7.0
Middle-income	23,627	13,789	54.5	58.4	7,926	33.5	1,912	8.1
Upper-income	14,920	9,193	36.3	61.6	4,556	30.5	1,171	7.8
TOTALS	50,846	25,298	100.0	49.8	21,600	42.5	3,948	7.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Under \$1 million		Over \$1 million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	721	17.5	605	17.0	69	18.2	47	25.3
Moderate-income	517	12.5	436	12.2	58	15.3	23	12.4
Middle-income	1,868	45.3	1,614	45.3	184	48.4	70	37.6
Upper-income	1,022	24.8	907	25.5	69	18.2	46	24.7
TOTALS	4,128	100.0	3,562	100.0	380	100.0	186	100.0
Percentage of Total Businesses:				86.3		9.2		4.5

Community contacts stated the economy is not doing well; there are many families that need housing but have not maintained acceptable credit. A great need in the community is financial literacy education, especially how to attain and maintain a credit rating.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN *BLOOMINGTON MSA, INDIANA*

The bank's performance in the Bloomington MSA is considered excellent under the lending test and good under the investment and service tests. The data that supports the conclusions is presented in the following sections.

LENDING TEST

Lending Activity

The bank originated 76 residential real estate loans totaling \$14.7 million and 228 loans to small businesses totaling \$73.5 million during the period under review. The bank also originated 14 SBA loans totaling \$4,490,000 in the Bloomington MSA assessment area. The bank's mortgage lending represented 5.8 percent of the HMDA-reportable originations for the bank by number and 8.1 percent by dollar. When 2006 IMC-originated loans are considered, the bank made 88 residential real estate loans totaling \$15.8 million during the period under review. The bank's small business lending represented 8.9 percent of the bank's loans to small businesses by number and 12.5 percent by dollar. The bank's level of lending is considered good.

Geographic Distribution

The bank's record under this performance criterion was assessed based on the bank's lending to small businesses. The bank's residential real estate lending comprised a relatively small portion of the bank's lending overall within this assessment area. Between the sale of IMC and the bank's emphasis on commercial lending, loans to small businesses were the focal point of this evaluation.

The bank's originations were dispersed throughout the assessment area. There were no significant gaps. The following tables summarize the bank's lending to small businesses by income level of the census tract in which the bank originated loans.

Irwin Union Bank & Trust Bloomington, Indian MSA Loans to Small Businesses, 2006 Geographic Distribution								
Income Level of Tract	Bank Loans			Aggregated Loans			Businesses	
	#	%	\$ (000's)	#	%	\$ (000's)	#	%
Low	27	23.9	6,739	409	11.1	15,698	757	17.0
Moderate	12	10.6	1,692	443	12.0	11,542	525	11.8
Middle	51	45.1	13,633	1711	46.3	46,677	2,072	46.6
Upper	23	20.4	4,536	1059	28.7	27,855	1,097	24.6
Tract Unknown	-0-	-0-	-0-	73	2.0	746	N/A	N/A
Total	113	100	26,600	3695	100	103,246	4,451	100.0

Irwin Union Bank & Trust Bloomington, Indiana MSA Loans to Small Businesses, 2007 Geographic Distribution								
Income Level of Tract	Bank Loans			Aggregated Loans			Businesses	
	#	%	\$ (000's)	#	%	\$ (000's)	#	%
Low	20	17.4	7,244	528	13.0	16,085	757	17.0
Moderate	21	18.3	3,599	482	11.9	16,141	525	11.8
Middle	47	40.9	8,014	1735	42.7	39,048	2,072	46.6
Upper	27	23.5	6,099	1199	29.5	31,165	1,097	24.6
Tract Unknown	-0-	-0-	-0-	121	3.0	1,536	N/A	N/A
Total	115	100.	24,956	4065	100	103,975	4,451	100.0

Based on the data in the preceding tables, the bank achieved an excellent level of lending throughout census tracts of different income levels, particularly in low- and moderate-income census tracts. There are only three low-income census tracts within the Bloomington MSA assessment area. The census tracts are part of an Enterprise Zone and the bank supported the revitalization of this Zone through its business lending operations.

The following data represents the mortgage lending originated directly by the institution in 2007; 2006 data was also reviewed for the purposes of this evaluation. 2007 data has been presented here because it accurately captures the dispersion pattern of the bank's lending within its assessment area. A similar pattern existed in 2006.

Irwin Union Bank & Trust Bloomington, Indiana MSA Residential Real Estate Mortgage Loans, 2007 Geographic Distribution										
Income Level of Tract	Bank Loans			Aggregated Loans			Families By Tract		Owner-Occupied Housing Units	
	#	%	\$ (000's)	#	%	\$ (000's)	#	%	#	%
Low	3	8.3	1,767	94	1.8	35,475	645	2.6	196	3.9
Moderate	5	13.9	394	520	10	52,106	2910	11.7	2120	28.9
Middle	15	41.7	2,919	2760	52.9	328,684	13179	52.9	13789	58.4
Upper	13	36.7	2,907	1846	35.4	291,529	8197	32.9	9193	61.6
Total	36	100	7,987	5220	100	707,794	24,931	100	25298	100

The bank originated three loans within low-income census tracts in 2007. The dollar volume for these three loans is relatively high. The bank provided a refinance loan on multiple homes that are used as off-campus student housing for the University of Indiana – Bloomington; this loan totaled over \$1.3 million and represented the majority of the dollars originated within the low-income census tracts of this assessment area.

There were no significant gaps in the bank’s dispersion of loans within this assessment area. Overall, the bank’s distribution of loans among geographies of different income levels is considered excellent within this assessment area.

Distribution by Borrower Income and Revenue Size of the Business:

The following table presents the bank’s record in originating loans to smaller companies by measuring the level of lending to businesses with \$1million or less in revenues and in smaller dollar amounts.

There are 4,451 businesses within the assessment area, and of these, 88.9 percent have revenues of \$1million or less. The high percentage of businesses with revenues of \$1million or less is an indicator that there are opportunities to lend to small businesses within this assessment area.

Irwin Union Bank & Trust Bloomington, Indiana MSA Loans to Small Businesses. 2006-07 Distribution by Borrower Revenue Level & Loan Amount												
Revenue Level	2006			2007			Aggregate 2006			Aggregate 2007		
	#	%	\$	#	%	\$	#	%	\$	#	%	\$
\$1mm or less	57	50.4	13091	64	55.7	13627	1,217	32.9	47280	1,257	30.9	46,698
Over \$1mm	56	49.6	13509	51	44.3	11329	2478	67.1	55220	2,808	69.1	57,277
Total	113	100.0	26600	115	100.0	24956	3695	100.0	10250 0	4,065	100.0	10397 5
Loan Amount												
\$100k or less	42	37.2	2,281	41	35.7	2287	3,494	94.6	33,303	3862	95.0	38333
\$100,001-\$250,000	39	34.5	6,439	41	35.7	6476	100	2.7	17357	108	2.7	18185
\$250,001-\$1mm	32	28.3	17880	33	28.7	16193	101	2.7	51840	95	2.3	47457
Total	113	100.0	26600	115	100	24956	3695	100.0	10250 0	4065	100.0	10397 5

Based on this data, the bank's origination of loans to small businesses is considered adequate based both on the number of originations to businesses with revenues of \$1million or less and to borrowers in smaller dollar amounts (\$100,000 and less). Compared to the aggregated lenders, the bank was more successful in meeting the credit needs of smaller businesses within this assessment area. Overall, the bank's level of lending to businesses with revenues of \$1million or less is considered adequate based primarily on the high level of opportunities that existed within the assessment area.

The following table presents the bank's residential real estate mortgage loans by borrower income level for 2007. The bank's 2006 data was also reviewed; it showed a similar pattern.

Irwin Union Bank & Trust Bloomington, Indiana MSA Residential Real Estate Mortgage Loans, 2007 Borrower Income Distribution										
Income Level of the Borrower	Bank Loans			Aggregated Loans			Families By Family Income		Families Below Poverty Level	
	#	%	\$ (000's)	#	%	\$ (000's)	#	%	#	%
Low	1	2.8	66	293	5.6	20,127	4,320	17.3	231	35.8
Moderate	5	13.9	338	843	16.1	75,842	4,201	16.9	598	20.5
Middle	5	13.9	708	1,159	22.2	123,092	5,255	21.1	618	4.7
Upper	22	61.1	4,477	2,164	41.5	338,687	11,155	44.7	324	4.0
Tract Unknown	3	8.3	2,398	761	14.6	150,046	-0-	-0-	-0-	-0-
Total	36	100.0	3,987	5,220	100.0	707,794	24931	100.0	1771	100

The bank's residential real estate lending was nominal compared to the lending accomplished by the aggregated lenders. The bank's performance also does not compare well to key demographics from the MSA. The bank's performance was poor; however, because the bank's lending level was so low and its focus is commercial lending, significant weight was not given to the bank's residential real estate lending in this assessment area.

Community Development Lending

Four loans totaling \$5,597,324 were originated during 2006 with community development as the primary purpose. All four loans were for the purpose of revitalization and stabilization of the Bloomington Enterprise Zone (Zone). The Zone is a designated Urban Enterprise Zone as approved by the Indiana Economic Development Corporation. The overall goal is "to further economic development efforts in the city's urban core." Activities to reach the goal include the restoration of building facades; purchase of existing buildings; construction of new buildings; rehabilitation of existing buildings; infrastructure installation/improvements; purchase

of new manufacturing equipment; retooling of existing machinery; and the creation of new jobs. The city offers tax incentives to individuals and entities taking part in these activities to reach the goal of economic development.

The Zone encompasses low- to middle-income census tracts. Three of the four loans are for revitalization of the Zone, but the properties to which they relate are located in the middle-income census tracts of the Zone. Through the loans, buildings within the Zone have been built, refurbished and rehabbed.

In 2007, the bank originated four loans to fund affordable housing units, including multi-family housing. The loans totaled \$1,158,203. Through the loans, at least 24 new permanent jobs were created and 21 apartment units were added to the Zone. Additional office/retail space has also been added, resulting in more services for current individuals who live in the communities included within the Zone.

INVESTMENT TEST

With respect to the investment test, the bank's performance in the Bloomington assessment area is considered adequate.

Investments have decreased by \$195,692 or 18.8 percent since the previous period. The bank has qualified investments totaling \$848,169 during the evaluation period. Of the total investments, \$522,281 are ongoing investments from prior periods, \$300,000 are new investments, and \$25,888 are donations and grants. The majority of the dollars were invested in two funds. One fund uses proceeds from the investment to provide affordable housing to LMI individuals; the second fund uses proceeds to make loans to small businesses located in moderate-income census tracts in the assessment area. The majority of the donations were to organizations that provide services to LMI individuals and families.

SERVICE TEST

The bank's overall service performance in this assessment area was considered good.

Retail Services

Delivery services are readily accessible to essentially all portions of the bank's assessment area. As of December 31, 2007, the bank had one branch office and one full-service ATM within the Bloomington MSA, both of which are located in a low-income census tract. The number of branch offices within this assessment area represents 4.3 percent of all the bank's branch offices. Low-and moderate-income households in the assessment area represent 41.0 percent of total households. Small businesses (less than or equal to \$1 million in revenues) represent 87.0 percent of all small businesses in the Bloomington assessment area. Lobby and drive-up hours are considered reasonable. Services are tailored to the convenience and needs of the assessment area, including low- and moderate-income geographies or individuals.

Community Development Services

The bank provides a relatively high level of community development services within the Bloomington assessment area.

Over the 2006-2007 time period, IUBT's officers and employees have participated in 16 qualified activities, totaling 978 hours, targeted to or primarily serving the needs of low- and moderate-income individuals. Two examples of the bank's qualified services are highlighted in the following:

Irwin Union Bank & Trust Community Development Services Bloomington MSA		
Organization	Mission/Purpose	Service Provided by Bank
Franklin Initiative	Offers educational programs to Bloomington school, educators and business community.	Numerous volunteers worked with children to help them learn budgeting, finances and real world practical applications.
Monroe County Apartment Association	Organization advocates for affordable housing.	Banker serves as the treasurer of the organization's board of directors.

METROPOLITAN AREA – COLUMBUS MSA

DESCRIPTION OF INSTITUTION'S OPERATIONS IN COLUMBUS, INDIANA

Irwin Union Bank and Trust operates seven branch offices in the Columbus MSA, representing 30.4 percent of the bank's branch offices. Of these branch offices, two are located in moderate-income census tracts, four are located in middle-income census tracts and one is located in an upper-income census tract. The bank has 13 ATMs in this assessment area, of which six are full-service and seven are cash-dispensing only. As of June 30, 2007, the bank is ranked first in deposit market share of 11 banks in the assessment area, with a deposit market share of 74.0 percent (www.fdic.gov).

The Columbus MSA was designated an MSA by the federal Office of Management and Budget (OMB) in 2004. The MSA consists of all of Bartholomew County, located in south-central Indiana. The assessment area includes all 15 census tracts in Bartholomew County. The estimated 2006 population for the MSA is 74,000 which is a 3.6 percent increase from 2000. The median age is 38.3 years where 25.0 percent of the population is under 18 and 13.0 percent is over 65 years old. The median family income is \$61,400 of which 9.0 percent of the total assessment area population or 6.0 percent of families were in poverty.

There was an estimated 4.4 percent increase in housing units from the 2000 census to the estimated 2006 census to 31,188 units, of which 10.0 percent are vacant. There were 29,853 housing units in the Columbus MSA, according to the 2000 census; 71.0 percent of the total occupied units were owner-occupied. The estimated median housing value rose in 2006 to \$126,333 from \$99,308 in 2000.

The 2000 census data showed that there were 5,631 housing units within the moderate-income census tracts of the assessment area. Of the housing units within the moderate-income census tracts, 4,679 units were single-family homes, representing 83.0 percent of the housing units within these census tracts. The median age of the housing stock within the moderate-income census tracts is 50 years, while the median housing value is \$75,607 and median gross rent is \$564.

The owner-occupied housing units within this assessment area total 20,738. Of these units, 3,353 units or 16.2 percent have values ranging from less than \$15,000 to less than \$60,000. Data is not available on the condition of this housing.

The affordability ratio, in the Columbus assessment area for 2006 is estimated to be 0.49. An area with a high ratio generally has less affordable housing than an area with a low ratio. Compared to nearby assessment areas, Indianapolis and Bloomington, whose affordability ratios are 0.44 and 0.43 respectively, homes are less affordable within the Columbus assessment area.

The largest industries in the Columbus area are manufacturing at 36.0 percent and educational services, health care, and social assistance at 19.0 percent. The largest employers in Bartholomew County include Cummins Inc., Columbus Regional Hospital Foundation Inc, and Bartholomew County Schools. The unemployment rate within the assessment area is decreasing from 4.7 percent in 2005 to 4.2 percent in 2006 and 3.7 percent in 2007.

Foreclosures for the Columbus MSA assessment area ranked nineteenth in the nation of the top 100 MSA's with a 2.2 percent foreclosure rate in 2006 which equates to one in every 45 houses. In 2007, the rate dropped to 1.8 percent or one in every 86.4 houses, ranking Columbus twenty fifth. (RealtyTrac)

Three community contacts were interviewed and they provided mixed views of the economic conditions within the Columbus MSA. They indicated that help with small business start-up costs and financial education are the greatest credit needs in the area.

Exhibit 3 contains key assessment area demographic information.

Exhibit# 3								
Assessment Area Demographic Profile Columbus MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families Below Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,549	17.6
Moderate-income	3	20.0	3,053	15.1	423	13.9	3,987	19.7
Middle-income	9	60.0	13,637	67.5	718	5.3	4,889	24.2
Upper-income	3	20.0	3,501	17.3	59	1.7	7,766	38.5
TOTALS	15	100.0	20,191	100.0	1,200	5.9	20,191	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	5,631	2,317	11.2	41.1	2,780	49.4	534	9.5
Middle-income	19,422	14,689	70.8	75.6	3,703	19.1	1030	5.3
Upper-income	4,800	3,732	18.0	77.8	715	14.9	353	7.4
TOTALS	29,853	20,738	100.0	69.5	7,198	24.1	1,917	6.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Under \$1 million		Over \$1 million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	652	29.7	542	29.2	83	32.9	27	33.3
Middle-income	1,226	55.9	1,051	56.5	134	53.2	41	50.6
Upper-income	314	14.3	266	14.3	35	13.9	13	16.0
Tract not reported	0	0.0	0	0.0	0	0.0	0	0.0
TOTALS	2,192	100.0	1,859	100.0	252	100.0	81	100.0
Percentage of Total Businesses:				84.8		11.5		3.7

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLUMBUS, INDIANA

The bank's performance within this assessment area was considered good under the lending, investment and service tests. The details of the bank's performance are discussed in the following sections.

LENDING TEST

The bank's lending within this assessment area is considered good overall. The bank's level of residential real estate lending outpaced its small business lending; this was the only assessment area for which this was true for the period under review. The bank's level of lending to businesses within geographies of different income levels is considered good, although its record within moderate-income census tracts, specifically, is considered adequate. The bank's distribution among borrowers by income level is considered good; however, it received less weight than the bank's record of lending to geographies of different income levels. The bank's record of originating community development loans is good. Its use of innovative and flexible lending programs and products is adequate, although it is noted that the bank uses SBA loans effectively within all of its assessment areas, including the Columbus MSA assessment area.

Lending Activity

For 2006-07 combined, the bank originated 643 residential real estate loans totaling \$81.1 million during the period under review, representing 49.1 percent of its HMDA-reportable lending by number and 44.5 percent by dollar. The bank originated 342 small business loans totaling \$84.4 million, representing 13.3 percent of its CRA-reportable loans to small businesses by number and 14.4 percent by dollar. The bank also originated six SBA loans within this assessment area; the loans totaled \$2,343,000.

The bank originated a significant percentage of its loans within this assessment area particularly as it relates to residential real estate lending. The Columbus MSA assessment area was the only assessment area where the bank's residential real estate lending outpaced its commercial lending within the assessment area. Please refer to

Core Table 1: Lending Volume for details.

Geographic Distribution

The bank’s record under this performance criterion was based upon the bank’s lending to consumers for residential real estate purposes and to small businesses. The bank’s originations were dispersed throughout the assessment area. There were no significant gaps in the dispersion of the bank’s loans within this assessment area.

The bank’s record is considered good based on the bank’s ability to serve individuals and businesses from census tracts throughout its assessment area.

The following table presents the distribution of the bank’s 2007 residential real estate loans by income level of the tract; data for 2006 was also reviewed for this evaluation but was not included within this report. The 2007 data accurately reflects the pattern of the bank’s lending during the period under review.

Irwin Union Bank & Trust Columbus, Indiana MSA Residential Real Estate Mortgage Loans, 2007 Geographic Distribution										
Income Level of Tract	Bank Loans			Aggregated Loans			Families By Tract		Owner-Occupied Housing Units*	
	#	%	\$ (000's)	#	%	\$ (000's)	#	%	#	%
Low	0	0	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-
Moderate	28	8.2	2,619	408	11.4	30,073	3,053	15.1	2,317	41.1
Middle	222	64.9	25,402	2,388	66.9	264,980	13,637	67.5	14,689	75.6
Upper	92	26.9	19,432	772	21.6	140,637	3,501	17.3	3,732	77.8
Total	342	100.0	47,453	3,568	100.0	435,690	20,191	100	20,738	69.5

*Note: Owner-occupied housing units are represented as a percentage of the housing units within the tract by income level that are owner-occupied. The percentage of total represents the owner-occupied housing units throughout the assessment area. ** There are no low-income census tracts within this assessment area.

Based on the preceding data, the bank’s lending to individuals from moderate-income census tracts did not compare well to the record achieved by aggregated lenders. The number of owner-occupied housing units within the moderate-income census tracts of

the Columbus MSA assessment area is low with less than half of all housing units owner-occupied. This represents a diminished level of opportunity that affected all lenders within this market. The bank’s record in serving individuals from moderate-income census tracts is considered adequate.

The following tables present the geographic distribution of the bank’s residential real estate lending by product and that of the aggregated lenders. Home purchase loans dominated the market for both the bank and the aggregated lenders.

Irwin Union Bank & Trust Company Columbus MSA Residential Real Estate Loans Reported under HMDA 2007 Bank Data By Tract Income Level and Product								
Tract Income Level	Home Purchase		Refinance		Home Improvement		Multi-family	
	#	%	#	\$	#	\$	#	\$
Moderate	16	7.4	10	10.9	1	3.1	1	100.0
Middle	143	65.9	56	60.9	23	71.9	-0-	-0-
Upper	58	26.7	26	28.3	8	25.0	-0-	-0-
Total	217	100.0	92	100.0	32	100.0	1	100.0

Note: There are no low-income census tracts in the Columbus MSA.

Irwin Union Bank & Trust Company Columbus MSA Residential Real Estate Loans Reported under HMDA 2007 Aggregated Lender Data By Tract Income Level and Product								
Tract Income Level	Home Purchase		Refinance		Home Improvement		Multi-family	
	#	%	#	\$	#	\$	#	\$
Moderate	187	10.2	187	13.3	32	9.6	2	33.3
Middle	1,236	67.7	915	65.3	233	69.8	4	66.7
Upper	403	22.1	300	21.4	69	20.7	-0-	-0-
Total	1,826	100.0	1,402	100.0	334	100.0	6	100.0

Note: There are no low-income census tracts in the Columbus MSA.

The majority of the bank’s lending was to individuals from middle-income census tracts. This reflects in part the composition of the Columbus MSA assessment area where the majority of all households (65.9 percent) and families (67.5 percent) live within middle-income census tracts. The bank outperformed the aggregated lenders in originating loans to borrowers from upper-income census tracts. However, its level of

lending to borrowers within moderate-income census tracts is lower than the level achieved by the aggregated lenders overall (the bank’s lending is included in the aggregated lenders’ numbers).

As noted previously, the percentage of owner-occupied housing units within the moderate-income census tracts is significantly lower than what is available within the middle- and upper-income census tracts, indicating fewer opportunities for all lenders serving this MSA. Therefore, the bank’s record is not mitigated by the lower level of opportunities available within the moderate-income census tracts.

The following table summarizes the bank’s lending to small businesses by income level of the census tract in which the bank originated loans. The following table presents data from the loans to small businesses reported by the bank and the other CRA reporters within this assessment area.

Irwin Union Bank & Trust Columbus, Indiana MSA Loans to Small Businesses, 2007 Geographic Distribution								
Income Level of Tract	Bank Loans			Aggregated Loans			Businesses	
	#	%	\$ (000's)	#	%	\$ (000's)	#	%
Moderate	57	32.9	13,445	540	26.0	23,101	725	29.3
Middle	92	53.2	20,499	1,087	52.3	44,197	1,371	55.4
Upper	24	13.9	10,306	399	19.2	20,124	375	15.2
Tract Unknown	-0-	-0-	-0-	54	2.6	1,624	-0-	-0-
Total	173	100	44,250	2,080	100	89,046	2,471	100.0

Based on the data in the preceding table, the bank’s level of lending to businesses located in census tracts of different income levels is excellent, based primarily on the bank’s lending to businesses within moderate-income census tracts. The Columbus MSA assessment area does not have any low-income census tracts. The bank’s record of lending to businesses by the income level of the census tract, although excellent, received less weight than the bank’s record of lending to individuals for residential real estate, for the reasons discussed previously.

Distribution by Borrower Income and Revenue Size of the Business

The following table presents data for the bank’s loans to small businesses by the revenue level of the borrower and the amount of the loan at origination. Because the bank’s assessment area has census tracts with three of the four available income designations (moderate, middle and upper), greater emphasis has been placed on the results of the analysis of the bank’s lending by tract income level.

Irwin Union Bank & Trust Columbus, Indiana MSA Loans to Small Businesses, 2006-07 Distribution by Borrower Revenue Level & Loan Amount												
Revenue Level	2006			2007			Aggregate 2006			Aggregate 2007		
	#	%	\$	#	%	\$	#	%	\$	#	%	\$
\$1mm or less	79	46.7	11,642	79	45.7	14657	734	37.7	33,412	763	36.7	37,215
Over \$1mm	90	53.3	28,486	94	54.3	29593	1,211	62.3	49,598	1,317	63.3	51,830
Total	169	100.0	40,128	173	100	44250	1,945	100.0	83,010	2,080	100.0	89,046
Loan Amount												
\$100k or less	76	45.0	3,935	68	39.3	3,641	1,771	91.1	19,344	1,889	90.8	21,974
\$100,001-\$250,000	51	30.2	9,647	54	31.2	10,106	91	4.7	16,779	107	5.1%	19,660
\$250,001-\$1mm	42	24.9	26,546	51	29.5	30,503	83	4.3	46,887	84	4.0	47,412
Total	169	100.0	40,128	173	100.0	44,250	1,945	100.0	83,010	2,080	100.0	89,046

The bank’s record of originating loans to small businesses, as detailed in the preceding table, is adequate. The bank’s level of lending to businesses with revenues of \$1million or less is somewhat low when compared to the presence of businesses with revenues of \$1 million or less within the assessment area; 88.6 percent of the businesses within this assessment area have revenues of \$1 million or less. Opportunities as measured by the presence of businesses with revenues of \$1 million or less within the community existed within this assessment area during the period under review.

The following table presents the bank’s residential real estate mortgage loans by borrower income level for 2007. The bank’s 2006 data was also reviewed; it showed a similar pattern.

Irwin Union Bank & Trust Columbus, Indiana MSA Residential Real Estate Mortgage Loans, 2007 Borrower Income Distribution										
Income Level of Borrower	Bank Loans			Aggregated Loans			Families By Family Income		Families Below Poverty Level	
	#	%	\$ (000's)	#	%	\$ (000's)	#	%	#	%
Low	38	11.1	2,880	354	9.9	24,271	3,549	17.6		
Moderate	65	19.0	6,247	719	20.2	60,636	3,987	19.7		
Middle	94	27.5	11,185	842	23.6	86,858	4,889	24.2		
Upper	135	39.5	25,882	1,249	35.0	199,187	7,766	38.5		
Unknown Income	10	2.9	1,259	404	11.3	64,738	n/a	n/a		
Total	342	100.0	47,453	3,568	100.0	435,690	20,191	100.0	1,200	5.9

The bank's residential real estate lending was consistent with the aggregated lenders for borrowers with low and moderate incomes. It exceeded the level of lending achieved by the aggregated lenders among borrowers with middle and upper incomes. The differences between the levels attained by the bank and the aggregated lenders were not significant. Neither the bank nor the aggregated lenders achieved a level of lending among borrowers with low incomes that was comparable to the percentage of low-income families within the assessment area. However, both the bank and the aggregated lenders served moderate-income families at a rate that was consistent with the percentage of moderate-income families within the assessment area. The bank's lending to borrowers of different income levels is considered good overall; however, its lending to low-income borrowers is considered adequate.

Community Development Lending

In 2006, community development loans in the Columbus MSA assessment area included five loans for \$1,323,000. In 2007, four loans qualified as community development loans totaling \$1,225,000. All community development loans were for the primary purpose of providing community services to low- and moderate-income individuals. The relative stability and prosperity of the Columbus MSA assessment area helps to explain both the bank's focus on community services for LMI individuals and

the relatively low dollar volume of the loans that qualified. Combined, the programs funded served thousands of LMI households during the period under review. The bank's record of originating community development loans in this assessment area is considered adequate.

INVESTMENT TEST

With respect to the investment test, the bank's performance in the Columbus MSA assessment area is considered excellent. The bank is a leader in providing community development investments in the Columbus MSA. The bank's qualified investments totaled \$5,023,616 during this evaluation period. This is an increase of \$2,990,616 or 147.1 percent since the previous examination. The majority of the qualified investment dollars were for an affordable housing project that used low-income housing tax credits (LIHTC) and totaled \$3,035,143. The project resulted in the creation or retention of 152 affordable housing units.

Included in the qualified investment totals are ongoing investments of \$1,341,476 from previous periods and donations of \$646,997. The bank's investments have helped subsidize approximately 254 affordable housing units in the assessment area. The majority of the donations were to organizations that provide services to low- and moderate-income individuals.

SERVICE TEST

The bank's overall service performance in this assessment area is good based on the distribution of its branch offices and ATMs; the range and accessibility of its delivery systems, products, and services; its record of opening and closing branch offices; its hours of operation; and the responsiveness of its community development services to the needs of the LMI population within this assessment area.

Retail Services

As of December 31, 2007, the total number of branch offices in this assessment area represents 30.4 percent of all the bank's branch offices. IUBT had a total of seven

branch offices within this assessment area: two in moderate-income, four in middle-income, and one in upper-income census tracts. There are no low-income census tracts within this assessment area. Within the Columbus MSA, low- or moderate-income households represent 39.0 percent of all households. Small businesses (less than or equal to \$1 million in revenues) represent 87.0 percent of all small businesses in the community. There are two branch offices, or 33.3 percent, located in moderate-income census tracts, while 18.3 percent of low- or moderate-income households are located in low- or moderate-income census tracts. Additionally, 28.8 percent of small businesses are located within low- or moderate-income census tracts. The bank's offices are reasonably accessible to the moderate-income areas and to the LMI population within this assessment area.

Furthermore, as of December 2007, the bank had six full-service ATMs within the Columbus MSA assessment area including two in moderate-income census tracts, three in middle-income census tracts and one in an upper-income census tract. Also, there were two cash-dispensing only ATMs located in moderate-income census tracts, three in middle-income census tracts, and two in upper-income census tracts.

IUBT did not open or close any branch offices since the prior examination in July 2006. In 2007, the bank relocated the former State Street branch office, in Bartholomew County, within a few blocks of the former location. Credit services and an ATM remained available and active at the State Street location throughout 2007. This change did not adversely affect low- or moderate-income individuals or communities. Services are generally tailored to the convenience and needs of the assessment area, including low- and moderate-income geographies or individuals.

Community Development Services

The bank provides a relatively high level of community development services through 36 various activities totaling 904 hours in the Bartholomew County assessment area. The services are mainly provided through bank leadership involvement and focus most often on community services targeted to low- and moderate-income individuals. The following are three examples of qualified community development services that highlight affordable housing and economic development endeavors:

Irwin Union Bank & Trust Community Development Services Columbus MSA		
Organization	Mission/Purpose	Service Provided by Bank
Columbus Housing Authority	Affordable rental housing for Senior Citizens	Banker serves on the Board of Directors and as such analyzes budget needs and manages accounts for the organization
Housing Partnerships, Inc.	Provide low-income financing for affordable homes	Banker serves on finance committee of the nonprofit
Columbus Enterprise Development Corporation	Provides small business management services to new and growing small businesses	Banker serves as the Chairman of the Board of Directors and as such conducts budget review and financial forecasting

Additionally in 2006, the bank began participating in the county's Individual Development Account (IDA) program by providing matching dollar investments and through the provision of savings accounts. This is a four-year program that is administered through the Eastside Neighborhood Community Center. This organization provides the financial counseling aspect of the IDA program. Currently, the Eastside Neighborhood Community Center reports a 93.0 percent success rate. Of the IDA's program participants, 52.0 percent have accounts at IUBT.

FULL-SCOPE METROPOLITAN AREA

DESCRIPTION OF INSTITUTION'S OPERATIONS IN INDIANAPOLIS MSA

IUBT operates six branch offices within this assessment area, which represents 26.1 percent of the bank's total branch offices. The bank has five full-service ATMs and two cash-only ATMs in this assessment area, none of which are located in low- or moderate-income geographies. According to the 2000 Census, 36.0 percent of the census tracts within the assessment area are low- or moderate income and 25.4 percent of the families within this assessment area are also considered to have low- or moderate-incomes. As of June 30, 2007, the bank is ranked eighteenth of 56 financial institutions in the MSA, with a 1.0 percent deposit market share. (www.fdic.gov).

The Indianapolis MSA assessment area is comprised of the following nine counties located in central Indiana: Boone, Marion, Brown, Hamilton, Hancock, Hendricks, Johnson, Morgan, and Shelby. The estimated 2006 population for the MSA is 1.7 million people which is a 13.3 percent increase from 2000. The largest city within the assessment area is Indianapolis with an estimated population in 2006 of 789,306, up from 781,870 in 2000. The 2006 estimated median family income is \$65,100; 11.0 percent of the assessment area population or 8.0 percent of families were considered to live below the poverty level in 2000.

The number of housing units increased 16.8 percent based on a 2006 estimate from the U.S. Census Bureau. Of these housing units, 13.0 percent were vacant and 69.0 percent of the total occupied units were owner-occupied; the remaining units were rentals. The estimated median housing value rose in 2006 to \$140,300 from \$112,737.

A closer look at the 2000 data reveals that owner-occupied units within the low- and moderate-income census tracts represent 2.9 percent and 18.1 percent, respectively, of the owner-occupied housing units within the assessment area. Further, within the low- and moderate-income census tracts, owner-occupied housing units represent 32.4 percent and 46.1 percent of the units, respectively. Compared to the rate of owner-occupancy within the assessment area as a whole, both the low- and moderate-income

census tracts are less likely to have owner-occupied units.

The median housing value for the assessment area is \$112,737. In general, homes are less affordable in this area. A closer look at the data reveals that the median housing value within low-income census tracts is \$51,819 while it is \$67,185 within moderate-income census tracts. Similarly, the median age of the housing stock in low- and moderate-income census tracts is 53 and 42 years, respectively; comparatively, the median age of the housing stock within the assessment area is 30 years. Taken together, this data demonstrates that the housing stock within the low- and moderate-income census tracts is both less expensive and older than the housing stock throughout the assessment area.

Another way to determine housing affordability is through the use of the affordability ratio. An area with a high ratio generally has more affordable housing than an area with a low ratio. The estimated 2006 affordability ratio is 0.44. Compared to the nearby Columbus MSA whose affordability ratio is 0.49, homes are less affordable in this assessment area.

The economy in the Indianapolis MSA is more diverse than the rest of the state. Educational services, health care, and social assistance are the largest industries in the assessment area; however, it is followed closely by manufacturing. The largest employers in the area include the following: Eli Lilly & Co; the State of Indiana; and Indiana and Purdue Universities. The unemployment rate in the assessment area is decreasing from 4.8 percent in 2005 to 4.4 percent in 2006 and 4.1 percent in 2007. Exhibit 4 provides a summary of key demographic factors for the Indianapolis assessment area using 2000 census data.

Exhibit# 4								
Assessment Area Demographics Profile Indianapolis MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families Below Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	26	8.4	16,213	4.1	4,591	28.3	73,985	18.9
Moderate-income	85	27.6	83,372	21.3	10,531	12.6	71,748	18.3
Middle-income	137	44.5	188,578	48.2	7,371	3.9	89,972	23.0
Upper-income	59	19.2	103,360	26.4	1,790	1.7	155,818	39.8
TOTALS	308	100.0	391,523	100.0	24,283	6.2	391,523	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	35,104	11,377	2.9	32.4	16,508	47.0	7,219	20.6
Moderate-income	154,343	71,080	18.1	46.1	66,948	43.4	16,315	10.6
Middle-income	298,057	195,928	49.9	65.7	83,369	28.0	18,760	6.3
Upper-income	143,864	114,207	29.1	79.4	23,083	16.0	6,574	4.6
TOTALS	631,368	392,592	100.0	62.2	189,908	30.1	48,868	7.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Under \$1 million		Over \$1 million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,565	3.2	1,311	3.2	199	3.4	55	3.0
Moderate-income	8,314	16.9	6,938	16.7	1,079	18.5	297	16.0
Middle-income	24,598	50.0	20,675	49.8	2,906	49.8	1,017	54.9
Upper-income	14,717	29.9	12,603	30.3	1,638	28.1	476	25.7
Unknown-income	41	0.1	21	0.1	13	0.2	7	0.4
TOTALS	49,235	100.0	41,548	100.0	5,835	100.0	1,852	100.0
Percentage of Total Businesses:				84.4		11.9		3.8

Single-family new housing permits totaled 1,947 in 2006 and 1,317 in 2007. The 2006 level of new housing permits represented a 29.4 percent decrease since 2005 and a 59.1 percent decrease since 2001.

Foreclosures for metropolitan Indianapolis which ranked highest in the country for the

first quarter in 2006 decreased in the second, third and fourth quarters but still ranked third nationally for 2006 among metro areas at a 4.3 percent foreclosure rate. This is equal to one in every 23 homes in foreclosure. In 2007, the foreclosure rate decreased 7.9 percent to a rate of 2.0 percent or one in every 50 homes in foreclosure. (RealtyTrac)

Community contacts indicated the economy is struggling in Indianapolis. Down payment assistance for home purchases and offering loan products for rehabilitating homes are credit needs identified by the contacts. Representatives indicated that IUBT has made a positive impression on the community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANAPOLIS, INDIANA

LENDING TEST

The bank's performance in the Indianapolis MSA suffered significantly from the sale of IMC. During the period covered by the prior evaluation, the bank and IMC originated 4,603 residential real estate loans within this assessment area. For 2006-07, the bank originated 305 residential real estate loans within this assessment area totaling \$41 million and representing 23.3 percent of the bank's HMDA-reportable lending overall by number and 23.0 percent by dollar. The bank also received consideration for IMC loans originated during the first half of 2006. These loans totaled 933 by number and \$104.9 million by dollar.

The bank originated 738 loans to small businesses totaling \$194 million during the period covered by this review. Comparatively, the bank originated 828 loans totaling \$203.4 million to small businesses during the period covered by the prior evaluation.

The decline in home loans is attributed to the local economic conditions, the sale of IMC and bank management's decision to focus on commercial lending. Therefore, more weight has been given to the bank's commercial lending. The bank's loans to small businesses declined by 90 loans between review periods. This is not considered significant given the economic conditions within this assessment area.

Lending Activity

Overall, the bank's small business lending in the Indianapolis MSA assessment area represented 28.7 percent by number and 33.1 percent by dollar of the bank's total CRA-reportable loans to small businesses for 2006-07 combined. The bank also originated 23 SBA loans totaling \$4,950,800 within the Indianapolis assessment area during the period under review. The Indianapolis MSA assessment area represents a major market for the institution and the bank's overall CRA rating was significantly impacted by its performance in this market. Overall, the lending level is considered good.

Geographic Distribution

The Indianapolis MSA assessment area is comprised of nine counties including Marion which is home to the city of Indianapolis and the bank's office. Within this MSA, there were 26 low-income census tracts; during the period under review, the bank originated small business loans in four of them.

There is a cluster of 12 low-income census tracts proximate to the bank's office where the bank originated few to no loans. This gap is not explained by a lack of resources as the bank originated more loans to small businesses within this market than it did in any other individual assessment area. It cannot reasonably be attributed to a lack of opportunities. Demographic data available for the 12 identified census tracts shows that they are home to 938 businesses, the majority of which have revenues of \$1 million or less (Dun & Bradstreet, 2007). The demographics are also consistent with the bank's stated mission to meet the commercial lending needs within its assessment areas.

The bank did, however, originate loans in tracts that border or surround the 12 low-income census tracts. While the bank did not serve the businesses of the 12 identified census tracts, the bank helped to serve LMI individuals and families of these census tracts through an affordable housing loan consortium that provides funding to borrowers for properties within most of the 12 census tracts. The results of the bank's consortium lending efforts are discussed under the Community Development Lending section of this portion of the evaluation.

In 2006, it also helped serve home owners within the identified census tracts through residential real estate loans originated by IMC. In the first half of 2006, IMC originated 12 loans to borrowers from low-income census tracts totaling \$816,000.

Overall for this assessment area, the data in the following table shows that the bank has not been able to effectively serve the credit needs of small businesses located in low- and moderate-income census tracts compared to the rate of lending by the aggregated lenders and the rate at which businesses are present within LMI census tracts.

Irwin Union Bank & Trust Indianapolis, Indiana MSA Loans to Small Businesses, 2007 Geographic Distribution								
Income Level of Tract	Bank Loans			Aggregated Loans			Businesses	
	#	%	\$ (000's)	#	%	\$ (000's)	#	%
Low	6	1.6	1,770	1,041	2.1	41,010	1,862	3.4
Moderate	40	10.8	10,055	6,294	12.6	213,848	9,165	16.6
Middle	213	57.3	49,282	23,375	46.7	657,412	27,267	9.3
Upper	113	30.4	33,166	18,539	37.1	536,294	16,950	30.7
Unknown	-0-	-0-	-0-	26	0.1	1,250	54	0.1
Tract Unknown	-0-	-0-	-0-	758	1.5	8,746	-0-	-0-
Total	372	100.0	94,273	50,033	100	1,458,560	55,298	100.0

The data in the preceding table shows that in 2007 the bank originated the majority of its loans to small businesses in middle-income census tracts. It performed comparably to the aggregated lenders in low-income census tracts and underperformed the aggregated lenders in moderate- and upper-income census tracts. The bank's performance in 2007 among low-income census tracts, although it is comparable to the rate achieved by the aggregated lenders, showed a gap in the 12 census tracts identified in the preceding discussion. The bank's originations of loans to a small businesses in 2006 were also reviewed for the purposes of this evaluation; the pattern of distribution was comparable to the data reviewed in 2007.

It was also noted that the bank continues to serve as the lender for a loan originated to small business through the Indiana Community Business Credit Corporation, which is a consortium loan pool that serves smaller businesses in the Indianapolis assessment area. This activity is discussed under the Community Development Lending criterion.

The following table presents the geographic distribution of the bank's residential real estate lending in 2007.

Irwin Union Bank & Trust Indianapolis, Indiana MSA Residential Real Estate Mortgage Loans, 2007 Geographic Distribution										
Income Level of Tract	Bank Loans			Aggregated Loans			Families By Tract		Owner-Occupied Housing Units*	
	#	%	\$ (000's)	#	%	\$ (000's)	#	%	#	%
Low	1	0.6	121	1,897	2.2	178,716	16,213	4.1	11,377	32.4
Moderate	20	12.3	1,378	10,930	12.5	1,042,129	83,372	21.3	71,080	46.1
Middle	120	74.1	15,226	43,036	49.3	5,488,398	188,578	48.2	195,928	65.7
Upper	21	13.0	4,936	31,454	36.0	5,734,981	103,360	26.4	114,207	79.4
Unknown	-0-	-0-	-0-	5	0.0	444	-0-	0.0	-0-	-0-
Total	162	100.0	21,661	87,322	100.0	12,444,668	391,523	100.0	392,592	62.2

*Note: Owner-occupied housing units are represented as a percentage of the housing units within the tract by income level that are owner-occupied. The percentage of total represents the owner-occupied housing units throughout the assessment area.

As can be seen from the data, the bank's lending is heavily weighted towards borrowers from middle-income census tracts. The bank's impact within low-income census tracts is negligible and its originations within moderate-income census tracts are consistent with the aggregated lenders' record but significantly below percentages of key demographics also shown within the table.

The bank's record during 2006 was consistent with its 2007 performance; however, with augmenting data from IMC, the geographic distribution in 2006 was better among low- and moderate-income census tracts. This data did not receive significant weight because the bank sold IMC during the third quarter of 2006, as previously mentioned, and the 2007 level of lending by the bank did not replace the IMC activity level. Therefore, the loans originated directly by IUBT are a more meaningful measure of the bank's performance in this assessment area. IMC data was considered a mitigating factor in assigning the overall rating to the bank under the lending test.

Borrower Distribution

The bank's performance in serving smaller businesses as measured by loans originated to businesses with revenues of \$1 million or less and loans originated in small dollar amounts, \$100,000 or less, is considered good. As detailed in the following table, the bank's record compared favorably to the record achieved by the aggregated lenders with respect to loans originated to businesses with revenues of \$1 million or less.

Irwin Union Bank & Trust Indianapolis, Indiana MSA Loans to Small Businesses. 2006-07 Distribution by Borrower Revenue Level & Loan Amount (Dollars are in Thousands)												
Revenue Level	2006			2007			Aggregate 2006			Aggregate 2007		
	#	%	\$	#	%	\$	#	%	\$	#	%	\$
\$1mm or less	215	58.7	53,716	222	59.7	52,624	16,534	33.0	584,406	18,484	33.0	636,273
Over \$1mm	149	40.7	44,840	150	40.3	43,649	33,499	67.0	874,154	37,593	67.0	1,048,714
Unknown Income	2	0.5	1,250	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-
Total	366	100.0	99,806	372	100	94,273	50,033	100.0	1,458,560	56,077	100.0	1,684,987
Loan Amount												
\$100k or less	123	33.6	7,193	146	39.2	8,366	47,440	94.8	481,865	53,189	94.8	592,854
\$100,001-\$250,000	94	25.7	16,738	94	25.3	16,801	1,211	2.4	218,496	1,340	2.4	239,410
\$250,001-\$1mm	149	40.7	75,830	132	35.5	69,106	1,377	2.8	758,199	1,548	2.8	852,723
Total	366	100.0	99,761	372	100.0	69,106	50,033	100.0	1,458,560	56,077	100.0	1,684,987

Within this assessment area, the majority of the businesses have revenues of \$1 million or less (86.8 percent), indicating that opportunities were available within this market. Overall, this performance criterion did not receive as much weight as the bank's performance under the geographic distribution criterion.

The following table presents the results of the bank's mortgage lending for 2007 by borrower income level. The data shows that the bank outperformed or was consistent with the aggregated lenders in originating loans among borrowers with low or

moderate incomes. However, the bank did not achieve levels consistent with the rate of presence of families with low or moderate incomes within the Indianapolis MSA assessment area.

Irwin Union Bank & Trust Indianapolis, Indiana MSA Residential Real Estate Mortgage Loans, 2007 Borrower Income										
Income Level of Borrower	Bank Loans			Aggregated Loans			Families By Family Income		Families Below Poverty Level	
	#	%	\$ (000's)	#	%	\$ (000's)	#	%	#	%
Low	20	12.3	1,546	7,306	8.4	559,947	73,985	18.9		
Moderate	33	20.4	2,728	18,510	21.2	1,819,321	71,748	18.3		
Middle	39	24.1	4,509	18,968	21.7	2,278,874	89,972	23.0		
Upper	53	32.7	10,357	30,496	34.9	5,509,485	155,818	39.8		
Unknown Income	17	10.5	2,521	12,042	13.8	2,277,041	-0-	-0-		
Total	162	100.0	21,661	87,322	100.0	12,444,668	391,523	100.0	24,283	6.2

Community Development Lending

The bank dedicated its resources to funding community development efforts that provided affordable housing units and community services to LMI individuals and households. Specifically, the bank originated six loans totaling \$6 million in 2006 and 13 loans totaling \$10 million in 2007. Over the two-year period under review, 15 of the loans provided funding for affordable housing and four funded the provision of community services to LMI individuals and households.

The Indianapolis MSA assessment area includes nine counties. The bank originated loans in three of the nine counties and three counties outside the assessment area that were in Indiana but not within any of the bank's Indiana assessment areas. The loans originated within the assessment area included loans originated within Marion County

which is home to the city of Indianapolis. Marion County has the greatest concentration of census tracts designated as low or moderate income and the highest levels of ethnic diversity within the assessment area and among the bank's assessment areas in Indiana.

The bank also participated in an affordable housing loan consortium in Indianapolis. Partnering with a nonprofit affordable housing developer and 13 other financial institutions, IUBT helped provide affordable loans to low-income borrowers who purchased housing units in low-income census tracts in Indianapolis. The tracts with this lending coincided with the 12 census tracts where the bank originated few to no loans directly, discussed under the geographic distribution analysis. This participation mitigates the bank's lack of direct lending, demonstrating that the bank was aware of credit needs within the low-income census tracts of the Indianapolis MSA assessment area and responded to them. During 2006, the bank was credited with one loan for \$99,000 through the Indianapolis Neighborhood Housing Services loan consortia; in 2007, it committed an additional \$2 million to the loan pool.

The bank also partnered with the Indiana Community Business Credit Corporation which is a multi-bank CDC that provides credit to smaller enterprises in Indiana generally and the Indianapolis MSA specifically. The bank has one loan outstanding with through this CDC, totaling \$309,137.

INVESTMENT TEST

With respect to the investment test, the bank's performance in the Indianapolis assessment area is adequate. The bank had qualified investments totaling \$5,558,299 during this evaluation period and had unfunded commitments totaling \$294,973. Of the total investments, \$5,487,376 are ongoing investments from prior periods and \$70,923 are donations and grants. The majority of the dollars were invested in affordable housing projects using LIHTCs. These affordable housing investments helped subsidize 658 affordable housing units in the assessment area. The bank also used mortgage-backed securities as well as a small business development fund to meet the needs of the community. Additionally, donations totaling \$70,923 were primarily given to organizations that provide services to LMI individuals and families. Qualified investments have decreased by \$1,128,894 or 16.9 percent since the previous evaluation period.

SERVICE TEST

The bank's overall service performance in the Indianapolis assessment area is adequate based on the bank's retail delivery systems; the products and services it offers; and the level of bank involvement in community development services.

Retail Services

Delivery services are reasonably accessible to most of the bank's assessment area. The bank has a total of six branch office locations within the Indianapolis assessment area, five are located in middle-income census tracts and one is located in an upper-income census tract. While low- or moderate-income households represent 39 percent of all households and small businesses (less than or equal to \$1 million in revenues) represent 87.0 percent of all small businesses in the Indianapolis assessment area, there are no branches located in low- or moderate-income census tracts. The total number of branch locations represents 26.1 percent of the bank's total number of branches. Also, the bank currently has six full-service ATMs within this assessment area. The ATMs are all located in middle or upper- income census tracts. The reasonableness of business hours and delivery of services do not vary in a way that inconveniences any portion of the Indiana assessment areas, including low- and moderate-income geographies or individuals.

While no branch offices have been closed within the assessment area since the last examination, the bank no longer maintains ATMs at the Knauf Corporation location. The Knauf Corporation was an "in-plant" ATM for Knauf employee use only.

Community Development Services

During 2006-07, the bank provided a limited level of community development services through only four instances of qualified activities totaling 252 hours in the Indianapolis assessment area. The most noteworthy of the four instances are listed in the following table:

Irwin Union Bank & Trust Community Development Services Indianapolis MSA		
Organization	Mission/Purpose	Service Provided by Bank
Realtor Foundation	Transition individuals from homelessness or inadequate housing to permanent solutions	Banker conducts homebuyer education
Habitat for Humanity	Eliminate poverty housing and homelessness and to make housing affordable	Banker serves as the treasure of the Board of Directors for the local chapter

NON-METROPOLITAN AREAS LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN INDIANA

IUBT's non-metropolitan Indiana assessment area consists of Decatur, Jackson and Jennings counties which are located in the south-central portion of Indiana. The bank has a total of two branch offices and two ATMs within this assessment area, both located within middle-income census tracts. As of June 30, 2007, the bank is ranked fifth out of 14 financial institutions in the three non-metro counties it serves, with a 7.3 percent deposit market share.

The population of the assessment area is 93,444 based on the 2000 census data. The largest city in the assessment area is Seymour with a population of 18,101. There are 26,217 families, of which 15.6 percent and 20.6 percent have low and moderate incomes, respectively. The median family income for the assessment area is \$44,803.

According to the 2000 census data, there are 38,598 housing units within the assessment area, of which 69.4 percent are owner-occupied. The median housing value for the assessment area is \$83,033. The affordability ratio for this area is 0.54. Compared to the nearby Columbus and Bloomington MSAs, whose affordability ratios are 0.52 and 0.43, respectively, homes are more affordable in this assessment area.

As is the case for most of Indiana, the manufacturing sector employs more people than any other industry within the assessment area. Large employers in the area include the

following: Aisin USA, Valeo Sylvania LLC, Wal-Mart Distribution Center, and Schwarz Pharma. A list of the unemployment rates for the counties that comprise this assessment area follows. Exhibit 5 presents a synopsis of key demographic factors for the combined non-metro assessment area of IUBT.

Unemployment Rates		
Non-Metropolitan Indiana Assessment Area		
County	Unemployment Rate 2006	Unemployment Rate 2007
Decatur County	4.4	4.7
Jackson County	4.4	4.0
Jennings County	5.8	5.3
State of Indiana	5.0	4.7

Exhibit# 5								
2000 Assessment Area Demographics								
Non-Metropolitan Indiana								
Income Categories	Tract Distribution		Families by Tract Income		Families Below Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	4,077	15.6
Moderate-income	0	0.0	0	0.0	0	0.0	5,397	20.6
Middle-income	19	95.0	24,376	93.0	1,566	6.4	7,370	28.1
Upper-income	1	5.0	1,841	7.0	112	6.1	9,373	35.8
TOTALS	20	100.0	26,217	100.0	1,678	6.4	26,217	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Middle-income	36,125	24,866	92.8	68.8	8,400	23.3	2,859	7.9
Upper-income	2,473	1,933	7.2	78.2	376	15.2	164	6.6
TOTALS	38,598	26,799	100.0	69.4	8,776	22.7	3,023	7.8
		Total Businesses by Tract	Businesses by Tract & Revenue Size					

			Under \$1 million		Over \$1 million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Middle-income	2,805	92.2	2,454	92.4	213	90.6	138	92.6
Upper-income	236	7.8	203	7.6	22	9.4	11	7.4
TOTALS	3,041	100.0	2,657	100.0	235	100.0	149	100.0
Percentage of Total Businesses:				87.4		7.7		4.9

Community contacts have echoed other contacts throughout the state that the economy is and has been struggling for awhile. Layoffs, foreclosures, and rising costs have all contributed to a slowdown in local economies. Contacts have also stated that financial education is a priority as many families do not understand the importance of maintaining a good credit history.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank’s performance in the non-metropolitan Indiana assessment areas is considered consistent with the bank’s performance in the state of Indiana under the lending test, below the performance in the state under the investment test and consistent under the service test. The data used to determine the bank’s level of consistency with its performance in the state is presented in the following sections.

LENDING TEST

Based on the following data, the bank’s performance is consistent with its performance in the state of Indiana.

In 2007, IUBT originated 80 mortgage loans totaling \$10,959,000 in the non-metropolitan Indiana assessment area; of these loans, 11 totaling \$668,000 were to borrowers with low incomes and 43 totaling \$3,042,000 were to borrowers with moderate incomes, representing 9.2 percent and 36.1 percent, respectively. The bank originated 70 loans totaling \$6,673,000 to small businesses with \$1 million or less in revenues, representing 59.3 percent of the loans originated by the bank overall.

The bank originated two community development loans totaling \$1,220,000 during the period under review; both loans were originated in 2007 and were for affordable

housing. The bank also originated loans under programs offered through the U.S. Small Business Administration (SBA). During the period under review, the bank originated six SBA loans in the non-metropolitan Indiana assessment areas totaling \$1,378,100.

INVESTMENT TEST

With respect to the investment test, the bank's performance in the non-metropolitan Indiana assessment area is below the bank's performance of "high satisfactory" for the rest of the state of Indiana. The bank has qualified investments totaling \$662,203. All of the investments were ongoing investments from prior periods except for \$19,234 in donations and grants. The majority of the investments consisted of funds which used proceeds for affordable housing projects. The majority of the donations were to organizations that provided services to LMI individuals and families. Investments in this assessment area have decreased 49.4 percent or \$645,562 since the previous review period.

SERVICE TEST

The service test performance is consistent with that of the state of Indiana. The bank operates two branch offices and two ATMs in the assessment area, both located in middle-income census tracts. Community development services are also consistent with those performed at the state level. Employees of the bank participated in eight community development activities totaling 288 hours of service.

STATE – MICHIGAN

CRA RATING FOR MICHIGAN: “SATISFACTORY”

The lending test is rated: Low Satisfactory

The investment test is rated: High Satisfactory

The service test is rated: Low Satisfactory

The bank’s rating for the state of Michigan was based on the adequate distribution of its loans among geographies of different income levels, with a notable weakness in lending to businesses and residents in the low-income census tracts of the Grand Rapids MSA. Its community development lending is adequate, with a noted weakness in the Grand Rapids MSA. The bank used flexible lending programs effectively, particularly the SBA guaranteed loan programs. The bank made qualified investments in a number and amount that demonstrated responsiveness to the assessment areas that the bank serves. The bank’s branch and ATM network is generally accessible to all portions of the assessment areas, including low- and moderate-income areas and individuals. The bank’s community development services adequately respond to the need for financial and credit counseling and financial education in the assessment areas served by the bank.

SCOPE OF EXAMINATION

Full-scope reviews were conducted for the Grand Rapids, Kalamazoo-Portage and Lansing-East Lansing MSA assessment areas within the state of Michigan. A limited-scope review was conducted for the activities within the Non-MSA counties within Michigan: Benzie, Grand Traverse, Kalkaska and Leelenau. The data reviewed included the bank’s 2006 and 2007 residential real estate loans and loans to small businesses collected under the Home Mortgage Disclosure Act and the Community Reinvestment Act, respectively. Residential real estate loans originated by IMC during the first half of 2006 and reported under the HMDA were also reviewed. Community development loans originated during 2006 and 2007 were reviewed for responsiveness to community development credit needs. The 2006 and 2007 qualified investments were reviewed for number, amount, innovativeness and complexity. The bank’s branch offices and ATM networks were reviewed for accessibility to the assessment areas, including low- and

moderate-income areas; products and services offered were reviewed for applicability to LMI households/individuals; and hours and community development services were reviewed for responsiveness to LMI households/individuals.

Although loan data from 2006 was reviewed, the evaluation presents 2007 data only. This data accurately reflects the pattern of the bank's lending within its assessment areas.

DESCRIPTION OF THE INSTITUTION IN MICHIGAN

Irwin Union Bank & Trust operates four branch offices and three ATMs in the state of Michigan; the Grand Rapids MSA assessment area does not have an ATM location. The assessment areas in Michigan accounted for 7.0 percent of the bank's total HMDA-reportable lending for this review period and 29.3 percent of the bank's total CRA-reportable loans to small businesses. The bank's deposit market share for its combined assessment areas is 0.83 percent; it is twenty-third of 54 institutions serving the same markets within the state.

The population for the state of Michigan as of the 2000 Census was 9,938,444. This population represents 3,788,780 households of which 382,871 live below the poverty level (10.1 percent). By comparison, the bank's combined assessment areas within Michigan have a population of 1,466,173 which represents 555,702 households of which 52,427 live below the poverty level (9.4 percent).

The following table presents the 2000 Labor Summary based on the 2000 Census. It provides an overview of the pattern of employment by the income level of the tract.

Irwin Union Bank and Trust Combined Assessment Areas State of Michigan 2000 Labor Summary			
Tract Income Level	Number of Persons 16 Years and Older	% of Persons in Labor Force	% of Persons Unemployed
Low	47,214	61.7	18.2
Moderate	168,320	68.5	8.1
Middle	630,833	69.9	4.2
Upper	273,243	71.1	2.8
Unknown	3,581	57.4	10.1
Total	1,123,191	69.6	4.9

Unemployment for the state increased slightly from 7.1 percent in December 2006 to 7.4 percent in December 2007; this was significantly higher than the national rates of 4.4 percent in December 2006 and 5.5 percent in December 2007.

The combined assessment areas include a portion of the Grand Rapids MSA, Kalamazoo-Portage MSA (Kalamazoo County), Lansing-East Lansing MSA (Ingham, Clinton and Eaton) and non-metro area counties in the northwest corner of the lower peninsula (Benzie, Grand Traverse, Kalkaska and Leelenau). Exhibit 6 provides additional demographic information for the bank's combined assessment areas in the state of Michigan.

Exhibit# 6

MI Combined Demographics

Combined Demographics Report

Restricted-FR

Exam: Irwin Union B&TC (130943) 080720080218495957

Analysis Year: 2007

Assessment Group(s): 2007 MI Combined

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	18	5.3	8,869	2.4	2,621	29.6	62,829	16.9
Moderate-income	63	18.4	48,533	13.1	7,532	15.5	66,722	18.0
Middle-income	180	52.6	214,369	57.8	9,373	4.4	89,818	24.2
Upper-income	79	23.1	99,042	26.7	2,633	2.7	151,444	40.8
Unknown-income	2	0.6	0	0.0	0	0.0	0	0.0
Total Assessment Area	342	100.0	370,813	100.0	22,159	6.0	370,813	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	20,550	5,193	1.3	25.3	12,951	63.0	2,406	11.7
Moderate-income	91,807	43,567	11.2	47.5	41,592	45.3	6,648	7.2
Middle-income	345,451	231,529	59.3	67.0	87,076	25.2	26,846	7.8
Upper-income	141,829	110,021	28.2	77.6	23,236	16.4	8,572	6.0
Unknown-income	62	0	0.0	0.0	62	100.0	0	0.0
Total Assessment Area	599,699	390,310	100.0	65.1	164,917	27.5	44,472	7.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,588	2.6	1,298	2.4	248	4.3	42	3.3
Moderate-income	8,800	14.6	7,577	14.2	1,039	18.0	184	14.5
Middle-income	32,296	53.6	28,725	54.0	2,873	49.8	698	54.8
Upper-income	17,294	28.7	15,411	28.9	1,562	27.1	321	25.2
Unknown-income	300	0.5	227	0.4	45	0.8	28	2.2
Total Assessment Area	60,278	100.0	53,238	100.0	5,767	100.0	1,273	100.0
Percentage of Total Businesses:				88.3		9.6		2.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	0.1	2	0.1	0	0.0	0	0.0
Moderate-income	38	1.9	30	1.5	8	11.8	0	0.0
Middle-income	1,513	74.7	1,468	75.1	42	61.8	3	100.0
Upper-income	471	23.2	453	23.2	18	26.5	0	0.0
Unknown-income	2	0.1	2	0.1	0	0.0	0	0.0
Total Assessment Area	2,026	100.0	1,955	100.0	68	100.0	3	100.0
Percentage of Total Farms:				96.5		3.4		0.1

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance in the state of Michigan is considered adequate overall with adequate performances under the lending and service tests and a good performance under the investment test. The bank's ratings were based on its performance during the two-year period under review (2006-07), pertinent demographic characteristics and relevant economic conditions. Also considered were the bank's strategic goals within its Michigan assessment areas, branch/ATM locations and competitive factors.

LENDING TEST

The bank's performance under the lending test for the state of Michigan is considered adequate based on its community development lending efforts in the Kalamazoo and Lansing-East Lansing assessment areas, its increased use of SBA loan programs to support small businesses and its geographic distribution of loans among census tracts of all income levels, particularly to borrowers from moderate-income census tracts; the bank's record of meeting the credit needs of borrowers from low-income census tracts is considered poor. The bank's record has been based on full-scope reviews of its MSA-based assessment areas: Grand Rapids MSA, Kalamazoo MSA and the Lansing-East Lansing MSA. The bank's performance in the Grand Rapids and the Lansing-East Lansing MSAs received the most weight during this review. The bank's performance in the low-income census tracts of the Grand Rapids assessment area is considered poor and was given significant weight in determining the overall lending test rating for the state of Michigan. The bank's community development lending in the Grand Rapids assessment area is also considered poor. The bank's performance has been discussed more fully under the section dedicated to the Grand Rapids MSA assessment area.

Lending Activity

During the prior review period, the bank originated 767 residential real estate loans totaling \$114.1 million in its Michigan assessment areas and 703 loans to small businesses totaling \$138.6 million. For the current review period (2006-07), the bank originated 91 residential real estate loans totaling \$21.5 million and 754 loans to small businesses totaling \$143.5 million. The bank originated 68 loans totaling \$15,959,600 under SBA programs to benefit small businesses in the assessment areas it serves in the

state of Michigan. Included within this number are the five loans totaling \$1,583,300 originated to businesses outside the bank's assessment areas but within the state of Michigan. The bank's lending under the SBA loan programs is substantial and had a mitigating effect on the bank's record of lending within the state of Michigan.

The decrease in residential real estate lending resulted from the combination of three primary factors: the bank's decision to re-focus its core lending efforts on its commercial lending operations; the sale of IMC; and the economic conditions within the Michigan assessment areas overall. The bank increased its lending to small businesses over the prior review period slightly while operating under deteriorating economic conditions. The bank's record is considered adequate.

Geographic and Borrower Distribution

The bank's records of lending to the households and businesses of low- and moderate-income census tracts and to low- and moderate-income individuals and small businesses, as measured by revenues, is summarized in the following tables. Overall, the bank's record in lending to borrowers from low-income census tracts is poor while its record of lending to borrowers from moderate-income census tracts is adequate. The bank's record of lending to borrowers of different income levels or revenues is considered adequate based on its small business lending, but did not receive significant weight in assigning the rating for the state of Michigan. The bank's data is discussed more fully under each of the MSA assessment area sections.

Irwin Union Bank & Trust Company Columbus, Indiana Loans to Small Businesses Reported under the CRA By Tract Income Level (Dollars are in Thousands)												
Assessment Area	2006				2007				Combined Total			
	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$
State of Michigan Combined	5	1,096	82	16,527	6	2,052	59	9,686	11	3,148	141	26,213
Grand Rapids MSA	0	0	28	7,869	0	0	19	3,248	0	0	47	11,117
Kalamazoo MSA	1	85	29	4,594	1	30	12	1,390	2	115	41	5,984
Lansing MSA	4	1,011	25	4,064	5	2,022	28	5,048	9	3,033	53	9,112
Note: The Non-MSA Michigan assessment area, which is comprised of Benzie, Grand Traverse, Kalkaska and Leelenau, counties does not have any low- or moderate-income census tracts.												

Irwin Union Bank & Trust Company Columbus, Indiana Residential Real Estate Loans Reported Under HMDA By Tract Income Level (Dollars are in Thousands)												
Assessment Area	2006				2007				Combined Total			
	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$
Michigan Combined	0	0	2	215	0	0	5	335	0	0	7	550
Grand Rapids MSA	0	0	1	150	0	0	3	206	0	0	4	356
Kalamazoo MSA	0	0	1	65	0	0	1	64	0	0	2	129
Lansing MSA	0	0	0	0	0	0	1	65	0	0	1	65
Note: The Non-MSA Michigan assessment area, which is comprised of Benzie, Grand Traverse, Kalkaska and Leelenau counties, does not have any low or moderate income census tracts.												

Irwin Union Bank & Trust Company Columbus, Indiana Residential Real Estate Loans Reported Under HMDA By Borrower Income Level (Dollars are in Thousands)												
Assessment Area	2006				2007				Combined Total			
	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$
Michigan Combined	4	218	8	777	2	178	4	302	6	396	12	1,079
Grand Rapids MSA	2	178	1	16	0	0	2	271	2	178	3	287
Kalamazoo MSA	4	218	3	262	0	0	1	43	4	218	3	262
Non-MSA Michigan	0	0	3	244	0	0	2	243	0	0	5	487

Irwin Union Bank and Trust Company Columbus, Indiana Loans to Small Businesses Reported under the CRA By Borrower Revenue Level (Dollars are in Thousands)												
Assessment Area	2006				2007				Combined			
	Loans to Businesses		Loans to Businesses w/Rev of \$1mm or less		Loans to Businesses		Loans to Businesses w/Rev of \$1mm or less		Loans to Businesses		Loans to Businesses w/Rev of \$1mm or less	
	#	\$	#	\$	#	\$	#	\$	#	\$	#	\$
MI Combined	400	77,869	240	41,272	354	65,583	238	38,192	754	143,452	478	79,464
Grand Rapids MSA	89	19,683	46	7,660	98	24,113	53	9,875	187	43,796	99	17,535
Kalamazoo MSA	96	15,158	44	2,024	133	24,089	82	15,394	229	30,552	126	17,418
Lansing-East Lansing MSA	110	18,082	64	9,946	107	20,229	76	13,077	217	38,311	140	23,023
Non-MSA Michigan	59	11,585	41	6,057	62	10,513	51	8,014	121	22,098	92	14,071

COMMUNITY DEVELOPMENT LENDING

For the period under review, the bank originated 11 loans totaling \$13,530,059. The loans impacted the Kalamazoo, Lansing-East Lansing MSA assessment areas and the non-metro assessment area in the state of Michigan. The bank did not originate any community development loans in the Grand Rapids MSA assessment area during the period under review. Overall, the bank's record of originating community development loans is considered adequate. The lack of community development lending in the Grand Rapids assessment area impacted the conclusions drawn for the state of Michigan.

INVESTMENT TEST

The bank made a good level of qualified investments during this evaluation period. The bank's qualified investments totaled \$7,365,777; this is an increase of \$522,965 or 7.6percent since the previous period. The bank also had unfunded commitments totaling \$1,460,893 in the state. Of the bank's investments in the state of Michigan, \$569,284 were new investments, \$6,704,160 were ongoing investments from prior periods, and \$92,333 were donations and grants.

Qualified investments included occasional use of innovative and complex investment programs. Similar to the Indiana assessment areas, the bank invested in several projects that used LIHTCs to fund construction of, or the maintenance of, affordable housing and to subsidize the down payment and closing costs for LMI borrowers. The bank also invested in mortgage-backed securities comprised of loans to LMI borrowers. All of the bank's Michigan investments were targeted towards affordable housing, with the exception of donations and grants. The bank's donations and grants were primarily targeted to community organizations that provide services to LMI individuals and families.

The bank's level of qualified investments represents good responsiveness to the community development needs within its assessment areas in the state of Michigan. The bank's qualified investments helped to meet the need for affordable housing in the state of Michigan.

SERVICE TEST

IUBT's overall service performance in the state of Michigan is adequate, based on the bank's ability to adequately deliver financial services to owners of small businesses throughout the assessment areas that it serves. The bank's record of delivering community development services specifically designed to benefit LMI individuals is also considered adequate based on the quantity and responsiveness of the bank's efforts to meet the need for services within the its assessment areas. All four Michigan assessment areas were reviewed with a particular focus on the Kalamazoo, Lansing and Grand Rapids areas because the areas represent a significant portion of IUBT's customer base and they also have the highest concentration of low- or moderate-income census tracts and individuals. The four branch offices located in the Michigan combined assessment areas represent 17.0percent of IUBT's overall branching network. Each assessment area was reviewed for retail banking and community development services.

Retail Services

IUBT maintains four branch offices in the state of Michigan, two of which have full-service ATMs and one branch that is located in a moderate-income census tract. The bank provides accessible alternative delivery methods to its customers through various means. Details regarding the alternative delivery methods are listed in the overall evaluation of the service test portion of this report. Bank branch lobby hours are consistent throughout the IUBT system. Products and services offered by the bank do not vary in a way that inconveniences the needs of the assessment area, including low and moderate- income geographies and/or individuals.

Community Development Services

The bank's delivery of qualified community development services throughout its Michigan assessment areas is considered good. The bank's personnel engaged actively in the community development services portion of the bank's program, frequently assuming leadership positions with partnering organizations. The bank's record of providing community development services includes 1,362 hours of service for 37 qualified activities within the assessment areas subject to a full-scope review and 1,674 hours of service for 45 qualified activities overall. The bank's record is discussed more

fully under the sections dedicated to the individual assessment areas.

METROPOLITAN AREAS – GRAND RAPIDS

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE GRAND RAPIDS MSA

IUBT operates one branch office in the assessment area and it is located in a middle-income census tract. As of June 30, 2007, the bank is ranked twenty-fourth out of 31 financial institutions in the MSA, with a 0.3percent deposit market share. (www.fdic.gov).

The population of the assessment area increased from 648,500, based on 2000 census data to an estimated 774,084 according to the 2006 census data. The bank's assessment area is unchanged since the last examination. It is comprised of Kent County, located in the Grand Rapids-Wyoming MSA, and nine census tracts in Ottawa County, which is part of the adjacent Holland-Grand Haven MSA. Both MSAs are part of the larger Grand Rapids-Muskegon-Holland Combined Statistical Area (CSA).

The bank operates one branch in this assessment area. It is located in Kent County; there is no branch office in the Ottawa County portion of the assessment area. The largest city in the assessment area is Grand Rapids, Michigan, with an estimated population of 184,369. The median family income for the MSA increased from \$55,810 to an estimated \$56,245. According to the 2000 census data, there are 165,388 families in the assessment area, 16.4percent and 18.0 percent of which are low- and moderate-income, respectively.

There were an estimated 317,000 housing units in 2006 which represents an increase from 249,372 housing units (2000 Census). Of these housing units, 67.8 percent were owner-occupied and 9.0 percent were vacant. The rate of single-family housing permits issued declined within this assessment area from 3,480 permits in 2005 to 2,449 permits in 2006 and 1,619 in 2007, representing -29.6 percent and -33.9 percent rates of decline, respectively. The median housing value for the assessment area increased significantly from \$115,568 according to 2000 data to an estimated \$145,900 in 2006. The affordability

ratio for this area has decreased dramatically from 0.48 in 2000 to 0.39 in 2006. Compared to the Kalamazoo and Lansing assessment areas, homes in this area are consistent with or slightly more affordable in the Grand Rapids assessment area.

Manufacturing is the largest employer by sector, followed by educational and health services and professional and business services. Large employers include General Motors, Meijer Inc., and Donnelly Corp. During the same time period, the unemployment rate in the Grand Rapids MSA increased from 5.9 percent to 6.1 percent in 2006 and 2007. These rates were greater than national unemployment rates of 4.6 percent in 2006 and 2007.

Community contacts stated that the economy is stagnant and that financial literacy education is really needed among the low- and moderate-income families.

Exhibit# 7								
Assessment Area Demographics Grand Rapids MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families Below Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	3.7	3,081	1.9	936	30.4	27,081	16.4
Moderate-income	26	19.3	23,974	14.5	3,813	15.9	29,680	17.9
Middle-income	73	54.1	96,875	58.6	3,948	4.1	41,180	24.9
Upper-income	31	23.0	41,458	25.1	951	2.3	67,447	40.8
TOTALS	135	100.0	165,388	100.0	9,648	5.8	165,388	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	5,148	1,807	1.1	35.1	2,691	52.3	650	12.6
Moderate-income	42,581	20,564	12.0	48.3	18,940	44.5	3,077	7.2
Middle-income	147,244	103,071	60.2	70.0	38,494	26.1	5,679	3.9
Upper-income	54,399	45,782	26.7	84.2	6,226	11.4	2,391	4.4
TOTALS	249,372	171,224	100.0	68.7	66,351	26.6	11,797	4.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Under \$1 million		Over \$1 million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	496	2.1	366	1.8	111	3.9	19	2.2
Moderate-income	3,728	15.8	3,066	15.5	500	17.6	162	19.0
Middle-income	12,694	54.0	10,836	54.7	1,403	49.3	455	53.5
Upper-income	6,606	28.1	5,558	28.0	833	29.3	215	25.3
TOTALS	23,524	100.0	19,826	100.0	2,847	100.0	851	100.0
Percentage of Total Businesses:				84.3		12.1		3.6

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's record under the lending test is considered poor for this assessment area. Its record of making qualified investments is considered good and its record of delivering services, including community development services, is considered adequate.

LENDING TEST

The bank's performance under the lending test is considered poor based on the lack of loans originated to borrowers from low-income census tracts and the lack of community development lending within the Grand Rapids assessment area. The bank's lending to small businesses located in moderate-income census tracts was considered excellent and the bank's overall performance under the geographic distribution criterion is considered adequate; it was negatively impacted by the lack of loans originated to businesses within low-income census tracts of the assessment area. The bank's distribution of loans to borrowers by revenue level is considered adequate but received less weight than its geographic distribution and community development lending within this assessment area.

Lending Activity

During the period under review, the bank originated 187 loans to small businesses totaling \$43.8 million and 28 residential real estate loans totaling \$4.0 million. IMC originated 10 residential real estate loans within this assessment area during the first six months of 2006. The bank did not originate any community development loans in the Grand Rapids assessment area. The bank originated a good level of loans under programs offered by the U.S. Small Business Administration. The bank's level of lending is considered poor overall.

Geographic Distribution

The bank's record of originating loans to small businesses within census tracts of different income levels is presented in the following table. The following table presents small business loan data from 2007 and demographic data about commercial enterprises within the assessment area. Although not discussed, 2006 data was also reviewed for the purposes of this evaluation and demonstrated a similar pattern of dispersion.

Irwin Union Bank & Trust Grand Rapids MSA Loans to Small Businesses, 2007 Geographic Distribution								
Income Level of Tract	Bank Loans			Aggregated Loans			Businesses	
	#	%	\$ (000's)	#	%	\$ (000's)	#	%
Low	-0-	0.0	-0-	546	2.0	45,602	607	2.4
Moderate	19	21.3	3,248	3,388	12.1	217,925	3,991	15.5
Middle	47	52.8	11,090	14,458	51.7	684,976	13,539	52.7
Upper	23	25.8	5,345	9,345	33.4	519,503	7,543	29.4
Total	89	100.0	19,683	24,480	100.0	1,467,021	25,680	100.0

As can be seen from the data, the bank originated loans to businesses in moderate-income census tracts at rates that exceeded the level achieved by the aggregated lenders and the rate of presence of businesses within the moderate-income census tracts. It is noted that the bank did not originate loans in the majority of moderate-income census tracts in the Grand Rapids MSA assessment area. This is not a concern at this time because the bank did originate a significant percentage of its loans in the moderate-income census tracts and its presence in this market is relatively small. The bank did not originate loans to small businesses in middle- and upper-income census tracts consistent with the level achieved by the aggregated lenders or the presence of businesses within these tracts; however, the differences in the rates of lending were considered insignificant.

The bank did not originate loans to small businesses within the low-income census tracts of the assessment area during either of the two years under review. These tracts are part of a cluster of LMI census tracts that received from few to no loans during the years under review. The data in the table shows that the aggregated lenders were able to identify opportunities within the low-income census tracts of the assessment area and the demographics show that businesses are present within the same census tracts. Bank management attributed its performance within this assessment area to high staff turnover. Based on demographic data, opportunities existed within the low-income census tracts.

The bank also originated 17 loans totaling \$5,335,700 under programs offered through

the U.S. Small Business Administration designed specifically to help small businesses obtain credit during 2006-07. During each year, two of the loans were originated to borrowers from moderate-income census tracts; none of the loans, in either year, benefited borrowers from low-income census tracts. The bank's use of flexible programs offered through the Small Business Administration is considered good and is consistent with the bank's focus on commercial lending within this assessment area. However, it did not mitigate the bank's performance in the low-income census tracts of Grand Rapids.

The bank did not respond to lending opportunities in the low-income census tracts. The record of lending to businesses in geographies of different income levels is considered adequate based on its level of lending to businesses within the assessment area overall. The bank's level of lending to businesses in moderate-income census tracts is considered excellent; however, its lack of lending to businesses in low-income census tracts is very poor and detracts from its overall performance.

The bank's record of originating loans reported under the Home Mortgage Disclosure Act (HMDA) has been included in the Core Tables found in the appendices to this document. The bank's HMDA-reportable lending was insignificant within this assessment area. The bank's performance was assessed based on its lending to small businesses as referenced previously.

Borrower Distribution

Data contained in the following table demonstrates that the bank originated loans to small businesses with revenues of \$1 million or less at levels that compared favorably to the record achieved by the aggregated lenders within the assessment area. The table also presents the bank's record in originating loans in small dollar amounts, \$100,000 or less.

Irwin Union Bank & Trust Grand Rapids MSA Loans to Small Businesses. 2006-07 Distribution by Borrower Revenue Level & Loan Amount												
Revenue Level	2006			2007			Aggregate 2006			Aggregate 2007		
	#	%	\$	#	%	\$	#	%	\$	#	%	\$
\$1mm or less	53	54.1	9,875	46	51.7	7,660	9,938	40.6	620,410	10,660	38.1	607,655
Over \$1mm	45	45.9	14,238	43	48.3	12,023	14,542	59.4	846,611	17,302	61.9	862,912
Unknown Income	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-
Total	98	100.0	24,113	89	100.0	19,683	24,480	100.0	1,467,021	27,952	100.0	1,470,567
Loan Amount												
\$100k or less	34	34.7	1,950	37	41.6	2,320	21,344	87.2	318,246	24,940	89.2	359,874
\$100,001-\$250,000	29	29.6	5,243	25	28.1	4,366	1,532	6.3	277,810	1,443	5.2	256,835
\$250,001-\$1mm	35	35.0	16,920	27	30.3	12,997	1,604	6.6	870,965	1,579	5.6	853,858
Total	98	100.0	24,113	89	100.0	19,683	24,480	100.0	1,467,021	27,962	100.0	1,470,567

The bank did not compare favorably to the aggregated lenders in this regard; however, its originations to businesses with revenues of \$1 million or less is a sufficient indicator of its performance in originating loans to small businesses. The results of the distribution of the bank's loans by assessment area carried more weight in drawing conclusions about the bank's lending performance within this market than the distribution by borrower revenue level.

The bank did not originate a significant level of residential mortgage loans within this market. The data was reviewed for the purposes of this evaluation and has been included within the Core Tables found in the appendix of this document.

Community Development Lending

The bank did not originate any qualified community development loans in the Grand Rapids MSA assessment area for the period under review. The bank's performance is considered very poor. Based on a review of aggregated lender data and the demographic data for this assessment area, community development lending opportunities have existed. Bank management attributed its lack of community development lending within this market to unusually high staff turnover during the

period under review. It has also been noted that the bank did not originate any community development loans within this assessment area during the prior period under review (2004-05). Bank management did not respond to community development opportunities within this market through its lending operations.

INVESTMENT TEST

With respect to the investment test, the bank's performance in the Grand Rapids assessment area is considered good. The bank has qualified investments totaling \$2,796,200 during the review period. The bank's investments have increased slightly by \$48,781 or 1.8 percent since the previous review period. Of the funded investments, \$2,195,155 represented ongoing investments from prior periods, \$569,284 represented new investments, and \$31,761 were donations and grants. The majority of the investments were mortgage-backed securities comprised of loans to LMI borrowers. The majority of the donations were to organizations that provided services to LMI individuals and families.

The bank also invested in an innovative and complex fund, which uses the sale of notes combined with equity to subsidize the construction or rehabilitation of affordable housing. The housing is leased to LMI families who receive homeownership counseling. After successful completion of the counseling, the units are then sold to the leasing families.

SERVICE TEST

IUBT's overall service performance for the Grand Rapids assessment area is considered adequate.

Retail Services

While the assessment area consists of 135 census tracts, of which 31 are low-or moderate- income, IUBT's sole Grand Rapids branch is located in a middle-income census tract, which hinders it slightly for its accessibility to low- and moderate- income areas. Within the Grand Rapids MSA assessment area, low- or moderate-income households represent 37.0 percent of all households and small businesses (less than or

equal to \$1 million in revenues) represent 87.0 percent of all small businesses in the community.

Delivery systems for the bank's various products and services are accessible to essentially all portions of the bank's assessment area through use of alternative delivery methods. There are no ATMs in the assessment area, however, this is mitigated by IUBT's policy to wave up to \$50.00 per month of ATM fees for its customers' use of non-proprietary ATMs. The single branch located in the assessment area represents 4.0 percent of IUBT's overall branching network.

Retail services may vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income areas. The bank's conventional 9:00 a.m. to 5:00 p.m. hours, with no weekend or extended teller hours, may result in low or moderate-income individuals being unable to use the bank's services because of similar work hours. This issue is heightened by the fact the bank is located in a middle-income census tract and there is no IUBT full-service ATM in the assessment area.

Community Development Services

IUBT provides a relatively high level of community services, given its limited presence in the assessment area. The Grand Rapids branch had 12 qualified activities totaling 576 hours of community development service. This activity helped to mitigate concerns about the bank's accessibility to the LMI areas and populations within its assessment area.

The bank's dedication to community development services was consistently demonstrated by its employees' acceptance of leadership roles with the various organizations it supports.

The following are examples of some community development services that were qualified and reflect the bank's leadership and focus on the needs of the community:

Irwin Union Bank & Trust Community Development Services Grand Rapids MSA		
Organization	Mission/Purpose	Service Provided by Bank
Lighthouse Communities	Provide funding to low and moderate-income individuals for affordable housing.	Loan Committee Member
Disability Advocates of Kent County	Prepare grant applications for LMI individuals with disabilities.	Board Member, Executive Committee Member
Women's Resource Center	Provide support for LMI women to develop job skills	Board Member and Finance Committee Member

METROPOLITAN AREAS

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE KALAMAZOO MSA ASSESSMENT AREA

IUBT operates one branch office and one ATM located in a moderate-income census tract. As of June 30, 2007, the bank is ranked eleventh of 22 financial institutions in the MSA, with a 1.8 percent deposit market share. (www.fdic.gov).

Based on the 2006 estimates from the Census Bureau, the population increased from 314,866 (2000 Census) to an estimated 319,738. The Kalamazoo MSA is comprised of Kalamazoo and Van Buren Counties. The largest city in the assessment area is Kalamazoo, Michigan, with an estimated population of 68,290. This represents an 11.5 percent decrease in population according to the 2006 estimate from the Census Bureau; the population of Kalamazoo based on 2000 Census data was 77,154. The estimated median family income in 2006 for the assessment area is \$58,191. In 2006, 17 percent of people lived in poverty. According to the 2000 census data, there are 58,270 families, 17.7 percent and 17.5 percent of which are low and moderate income, respectively.

Housing units increased from 133,225 to 144,000 of which 61.1 percent are owner occupied and 12.0 percent are vacant. The median housing value for the assessment area increased from \$105,196 to the 2006 estimate of \$140,500. The affordability ratio for this area has decreased from 0.49 using 2000 census data to 0.41 using 2006 estimated data. Compared to the Lansing assessment area which has an affordability ratio of 0.38, homes are more affordable within the Kalamazoo assessment area.

The manufacturing industry is the largest industry in the MSA, followed closely by government, education and health services. Pharmacia, Stryker Corporation, Western Michigan, and Borgess Health Alliance are the largest employers in the assessment area. The unemployment rate within the assessment area increased from 5.5 percent in 2006 to 5.7 percent in 2007.

Contacts made within the community indicated the economy is struggling and that

banks have really tightened their credit standards making it difficult for many to qualify for any lending. Contacts indicated that all of the banks, including IUBT, maintain a positive image in the community.

The following Exhibit provides additional demographic information for the Kalamazoo MSA.

Exhibit# 8								
Assessment Area Demographics								
Kalamazoo MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families Below Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	6.7	2,223	3.8	663	29.8	10,318	17.7
Moderate-income	12	20.0	7,410	12.7	1,115	15.0	10,221	17.5
Middle-income	28	46.7	28,937	49.7	1,430	4.9	13,497	23.2
Upper-income	16	26.7	19,700	33.8	604	3.1	24,234	41.6
TOTALS	60	100.0	58,270	100.0	3,812	6.5	58,270	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	5,268	1,394	2.3	26.5	3,364	63.9	510	9.7
Moderate-income	17,683	6,928	11.3	39.2	9,361	52.9	1,394	7.9
Middle-income	48,817	31,143	50.7	63.8	15,146	31.0	2,528	5.2
Upper-income	27,482	22,019	35.8	80.1	4,124	15.0	1,339	4.9
TOTALS	99,250	61,484	100.0	61.9	31,995	32.2	5,771	5.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Under \$1 million		Over \$1 million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	253	2.9	197	2.6	43	4.7	13	4.1
Moderate-income	1,887	21.7	1,577	21.1	229	25.2	81	25.3
Middle-income	4,104	47.1	3,530	47.2	436	47.9	138	43.1
Upper-income	2,464	28.3	2,174	29.1	202	22.2	88	27.5
TOTALS	8,708	100.0	7,478	100.0	910	100.0	320	100.0
Percentage of Total Businesses:				85.9		10.5		3.7

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance under the lending and service tests for the Kalamazoo MSA assessment area is considered adequate. The bank's performance under the investment test is considered good. The data and facts used to draw the conclusions about the bank's performance are presented in the following sections.

Lending Activity

The bank originated 229 loans to small businesses totaling \$39.2 million and 36 residential real estate loans totaling \$5.1 million for the period under review. IMC originated 45 loans totaling \$6.4 million for this assessment area through the first six months of 2006. Comparatively, the bank originated 286 loans to small businesses totaling \$41 million and 219 residential real estate loans, including IMC originations, totaling \$35.9 million during the previous review period. The sharp decline in loans to small businesses is attributed to a decline in the economic conditions within the Kalamazoo assessment area overall. The decline in residential real estate lending was expected with the sale of IMC and management's decision to concentrate on commercial lending operations within this assessment area. Overall, the bank's level of lending within the assessment area is considered adequate.

Geographic Distribution

As demonstrated in the following tables, the bank's lending was concentrated within the upper- and middle-income census tracts of the assessment area. The following table presents the bank's data for 2007. 2006 data was also reviewed for the purposes of this evaluation. It has not been included within this analysis but its results are generally consistent with the patterns of dispersion seen in the 2007 data.

Irwin Union Bank & Trust Kalamazoo MSA Loans to Small Businesses, 2007 Geographic Distribution								
Income Level of Tract	Bank Loans			Aggregated Loans			Businesses	
	#	%	\$ (000's)	#	%	\$ (000's)	#	%
Low	1	1.0	30	189	2.5	15,112	270	3.0
Moderate	12	12.5	1,390	1,220	15.8	45,551	1,893	20.8
Middle	40	41.7	7,570	3,513	45.6	127,466	4,238	46.5
Upper	43	44.8	6168	2,660	34.5	87,902	2,714	29.8
Tract Unknown	-0-	-0-	-0-	128	1.7	1,141	-0-	-0-
Total	96	100.0	15,158	7,710	100.0	277,172	9,115	100.0

The bank's lending to businesses in the moderate-income census tracts and low-income census tracts did not keep pace with the level of lending achieved by the aggregated lenders in this market; nor did it compare favorably to the percentage of businesses located within this market. In part, this may be connected to fewer opportunities within the three low-income census tracts of the assessment area.

As shown above, the low-income census tracts have 270 businesses within them. However, it does not explain the lack of significant lending in the moderate-income census tracts of the assessment area. The bank's record is considered poor based on its distribution among census tracts of different income levels, particularly low- and moderate-income census tracts.

The bank also originated seven loans totaling \$1,635,700 to businesses through programs offered by the U.S. Small Business Administration. The SBA's loan programs are designed specifically to facilitate credit to small businesses. The bank originated the loans to businesses in middle- and upper-income census tracts.

The bank's originations of loans reported under the Home Mortgage Disclosure Act are included in the Core Tables which are found in the appendices to this report. The bank's focus in this market is its commercial lending.

Borrower Distribution

The bank's record of lending to smaller businesses was measured by loans originated to businesses with revenues of \$1 million or less and in smaller dollar amounts of \$100,000 or less. As can be seen from the data in the following table, the bank outperformed the aggregated lenders in originating loans to borrowers with revenues of \$1 million or less. Over 61.7 percent of the bank's originations were to businesses with revenues of \$1 million or less. The bank's record is considered good. The results of this analysis received less weight than the analysis of the bank's loan distribution by income level of the census tracts.

Irwin Union Bank & Trust Kalamazoo MSA Loans to Small Businesses, 2006-07 Distribution by Borrower Revenue Level & Loan Amount												
Revenue Level	2006			2007			Aggregate 2006			Aggregate 2007		
	#	%	\$	#	%	\$	#	%	\$	#	%	\$
\$1mm or less	82	61.7	15,394	65	67.7	9,441	2,764	39.1	109,677	3,011	39.1	102,697
Over \$1mm	51	38.3	8,695	31	32.3	5,717	4,310	60.9	191,730	4,699	60.9	174,475
Total	133	100.0	24,089	96	100.0	15,158	7,074	100.0	301,407	7,710	100.0	277,172
Loan Amount												
\$100k or less	70	52.6	4,270	44	45.8	2,024	6,441	91.1	78,695	7,145	92.7	84,675
\$100,001-\$250,000	39	29.3	6,728	34	35.4	5,540	322	4.6	57,713	305	4.0	54,298
\$250,001-\$1mm	24	18.0	13,091	18	18.8	7,594	311	4.4	164,999	260	3.4	138,199
Total	133	100.0	24,089	96	100.0	15,158	7,074	100.0	301,407	7,710	100.0	277,172

The bank's record of originating loans reported under the Home Mortgage Disclosure Act has been included in the Core Tables presented in the appendices to this document.

Community Development Lending

The bank originated three community development loans over the review period totaling \$2,397,000. With the exception of one \$25,000 loan that funded the provision of community services to LMI households, the rest of the dollars funded affordable

housing units made available to LMI households within the assessment area. The bank's loans for affordable housing had a positive impact on a minimum of 68 housing units while its one loan for community services impacted approximately 480 LMI individuals and households.

Comparatively, the bank originated four loans totaling \$5.6 million during the period covered by the previous evaluation.

All of the bank's prior period community development lending was targeted to affordable housing. The bank's record of originating community development loans within this assessment area is considered adequate.

Although the bank originated fewer loans/dollars for community development purposes over the previous period, the bank's record is mitigated by the worsening economic conditions within the assessment area and by the bank's ongoing commitment to fund affordable housing through its community development lending.

INVESTMENT TEST

With respect to the investment test, the bank's performance in the Kalamazoo assessment area is considered good. The bank has qualified investments totaling \$1,351,982 during the review period. Investments have increased \$431,760 or 46.9 percent since the previous examination. Of the funded investments, \$1,336,805 were ongoing investments from prior periods and \$15,177 were donations and grants. The majority of the investment dollars were used to create or maintain 162 affordable multi-family units through the use of LIHTCs. The majority of the donations went to organizations that provide services to LMI individuals and families.

SERVICE TEST

IUBT's overall service performance for the Kalamazoo assessment area is adequate based on its branch and ATM locations, effective delivery systems for products and services to LMI individuals and the high level of community development services performed by the branch's staff. The assessment area consists of 60 tracts, of which 16 are low or moderate income.

Retail Services

IUBT's Kalamazoo branch is located in a moderate-income census tract, which aids in the delivery of IUBT's services and products to low- and moderate- income individuals. Within the Kalamazoo MSA assessment area, low- or moderate-income households represent 39.0 percent of all households. Small businesses (less than or equal to \$1 million in revenues) represent 88.0 percent of all small businesses in the community. Delivery systems for the bank's various products and services are accessible to essentially all portions of the bank's assessment area through use of alternative delivery methods. The bank has a full-service ATM at its Kalamazoo branch location. Additionally, the single branch office located in the assessment area represents four percent of IUBT's overall branching network.

Retail services do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate- income geographies and/or low- and moderate- income individuals. The bank's conventional 9:00 a.m. to 5:00 p.m. hours, with no weekend or extended teller hours, may result in low- or moderate- income individuals being unable to use the bank's services because of similar work hours. The bank's location in the moderate-income census tract mitigates concerns about its hours, particularly because the branch office has a full-service ATM.

Community Development Services

IUBT provides a relatively high level of community services, given its limited exposure in the assessment area. The Kalamazoo branch office had 16 qualified activities totaling 390 hours of community development service.

A determining factor in the assessment of the bank's community development services was the consistent demonstration of leadership roles its employees take on for the many activities, including Board of Director memberships and "Chairs" of decision-making committees. The following are examples of community development services that were qualified and reflect the bank's leadership and focus on the needs of the community:

Irwin Union Bank & Trust Community Development Services Kalamazoo MSA		
Organization	Mission/Purpose	Service Provided by Bank
Kalamazoo Area Housing Corporation	Provide funding to low- and moderate-income individuals, in order to purchase homes	Vice President, Board of Director and Executive Committee
Habitat for Humanity	Works in partnership with people in need to build and renovate affordable housing	Board Member, Executive and Selection Committee Member
Local Initiatives Support Corporation	Assists local community development organizations to revitalize and stabilize various neighborhoods	Vice Chairman and Member of Loan Committee

FULL REVIEW

METROPOLITAN AREAS

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LANSING-EAST LANSING MSA

IUBT operates one branch office and one ATM within the assessment area, located in an upper-income census tract. As of June 30, 2007, the bank is ranked fifteenth of 24 financial institutions in the MSA, with a 1.5 percent deposit market share. (www.fdic.gov).

Based on 2006 census estimates, the population of the assessment area increased from 447,728 based on 2000 census data to 454,044. The Lansing MSA is comprised of Clinton, Eaton and Ingham counties. The largest city within the assessment area, Lansing, Michigan, with an estimated population of 110,000 in 2006, is also the state capital. The median family income for the MSA is \$59,505 while 15.0 percent of people lived in poverty in 2006. According to the 2000 census data, there are 110,774 families within the assessment area, 18.7 percent and 18.5 percent of which are low-and moderate- income, respectively.

There are an estimated 196,000 housing units which increased from the 181,804 housing units in the Lansing MSA, of which 9.0 percent are vacant and 63.3 percent are owner occupied. The median housing value for the assessment area increased from \$106,238 in 2000 to an estimated \$155,900 in 2006. The affordability ratio for this area decreased significantly from 0.52 using 2000 data to 0.38 using 2006 data estimates. Compared to the Kalamazoo MSA which has an affordability ratio of 0.49, homes in this area are less affordable.

Government is the largest employer by sector, followed by educational and health services, and retail trade. Large employers include the State of Michigan, Ingham Regional Medical Center, and Meijer Inc. The unemployment rate in the assessment

area maintained at 5.9 percent in both 2006 and 2007.

Community contacts have mentioned that the economy in Lansing is doing better than many other cities in Michigan. New development lending is a need identified by the contacts.

Assessment area demographics are presented in Exhibit 9.

Exhibit# 9								
Assessment Area Demographics								
Lansing MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families Below Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	9	7.7	3565	3.2	1,022	28.7	20,751	18.7
Moderate-income	25	21.4	17,149	15.5	2,604	15.2	20,487	18.5
Middle-income	58	49.6	65,760	59.4	2,792	4.2	26,074	23.5
Upper-income	23	19.7	24,300	21.9	679	2.8	43,462	39.2
TOTALS	117	100.0	110,774	100.0	7,097	6.4	110,774	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	10,134	1,992	1.7	19.7	6,896	68.0	1,246	12.3
Moderate-income	31,543	16,075	13.9	51.0	13,291	42.1	2,177	6.9
Middle-income	102,198	70,927	61.2	69.4	26,632	26.1	4,639	4.5
Upper-income	37,867	26,907	23.2	71.1	9,631	25.4	1,329	3.5
TOTALS	181,804	115,901	100.0	63.8	56,512	31.1	9,391	5.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Under \$1 million		Over \$1 million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	742	4.3	600	4.0	93	6.5	49	6.1
Moderate-income	2,994	17.5	2,513	16.9	323	22.7	158	19.8
Middle-income	8,944	52.2	7,980	53.5	600	42.2	364	45.5
Upper-income	4,110	24.0	3,590	24.1	356	25.0	164	20.5

Unknown-income	337	2.0	221	1.5	51	3.6	65	8.1
TOTALS	17,127	100.0	14,904	100.0	1,423	100.0	800	100.0
Percentage of Total Businesses:				87.0		8.3		4.7

CONCLUSIONS WITH RESPECT TO THE PERFORMANCE TESTS

The bank's performance under the lending and service tests is considered adequate and good under the investment test based on the data presented in the following sections.

Lending Activity

The bank originated 217 loans to small businesses totaling \$38.3 million, 13 residential real estate loans totaling \$9.4 million and five community development loans totaling \$6.2 million for the period under review. IMC originated 16 residential real estate loans totaling \$2.6 million during the first six months of 2006. The bank's level of lending is considered adequate based on its lending to small businesses within the assessment area.

Geographic Distribution

The following table presents the dispersion of the bank's loans to small businesses within tracts of varying income levels in the Lansing MSA assessment area. The bank's record has been assessed based on its loans to small businesses because the bank's intent is to use its commercial lending operations to meet the credit needs of the assessment area.

The following table presents small business data for 2007. Data from 2006 was also reviewed for the purposes of this evaluation; however, it has not been included within the report. The dispersion pattern for 2006 was consistent with the bank's performance in 2007.

Irwin Union Bank & Trust Lansing MSA Loans to Small Businesses, 2007 Geographic Distribution								
Income Level of Tract	Bank Loans			Aggregated Loans			Businesses	
	#	%	\$ (000's)	#	%	\$ (000's)	#	%
Low	4	4.7	2,022	515	3.7	15,875	711	4.1
Moderate	28	26.2	5,048	1,979	14.2	82,867	2,916	16.9
Middle	39	36.4	7,025	7,135	51.4	199,489	9,049	52.5
Upper	32	29.9	5,750	3,866	27.8	133,963	4,248	24.7
Unknown	3	2.8	384	139	1.0	10,438	300	1.7
Tract Unknown	-0-	-0-	-0-	259	1.9	3,519	-0-	-0-
Total	107	100.0	20,229	13,893	100.0	446,151	17,224	100.0

The bank originated loans in moderate-income census tracts at a rate that exceeded the rate achieved by the aggregated lenders within the same market and the rate at which businesses are present within the moderate-income census tracts. The remainder of the bank's loan originations focused primarily on businesses located in middle-income census tracts and upper-income census tracts. The bank's percentages of loans were higher in the upper-income census tracts versus middle-income census tracts which is the inverse of the aggregated lenders' performance.

As the data shows, the middle-income census tracts are home to a majority of the businesses that are located within the assessment area. Within the low-income census tracts, the bank originated four loans. While this represents a percentage of total lending that is comparable to the percentage achieved by the aggregated lenders and to the presence of businesses within the low-income census tracts, the actual number of loans originated is too limited to give it significant weight.

The bank is also an active lender under programs offered through the U.S. Small Business Administration. The bank originated 26 SBA loans totaling \$3.8 million in the Lansing MSA during the period under review. Of the SBA loans originated, one each benefited a borrower from a low-income and a moderate-income census tract.

There were low- and moderate-income census tracts within the bank’s assessment area where the bank did not originate any loans during the period under review; however, the tracts were not proximate to the bank’s office. Businesses in low- and moderate-income census tracts proximate to the bank’s office received loans. As noted previously, the bank originated loans to borrowers within the moderate-income census tracts at rates that exceeded the levels achieved by the aggregated lenders and the rates of presence of businesses within the census tracts. The bank’s record is considered good based on its level of lending to businesses within moderate-income census tracts.

The bank’s residential real estate lending reported under the Home Mortgage Disclosure Act (HMDA) may be found in the Core Tables located in the appendices to this document. The data has not been discussed within this report; the bank’s focus in this market is its commercial lending.

Borrower Distribution

The following table presents the bank’s loans to small businesses by borrower revenue level and loan amount and compares it to the record achieved by the aggregated lenders for 2006 and 2007. As can be seen from the data, the bank originated the majority of its loans to borrowers with revenues of \$1 million or less in both 2006 and 2007, increasing in both numbers and percent in 2007. Loans made in smaller dollar amounts remained relatively flat between 2006 and 2007. The bank’s record of originating loans in census tracts of different income levels carried more weight in this analysis than did the distribution of its loans by borrower revenue level and original loan amount.

Irwin Union Bank & Trust Lansing MSA Loans to Small Businesses, 2006-07 Distribution by Borrower Revenue Level & Loan Amount (Dollars are in Thousands)												
Revenue Level	2006			2007			Aggregate 2006			Aggregate 2007		
	#	%	\$	#	%	\$	#	%	\$	#	%	\$
\$1mm or less	64	58.2	9,946	76	71.0	13,077	4,886	39.9	204,607	5,566	40.1	199,065
Over \$1mm	46	41.8	8,136	31	29.0	7,152	7,355	60.1	246,787	8,327	59.9	247,08

												6
Total	110	100.0	18,082	107	100.0	20,229	12,241	100.0	451,394	13,893	100.0	446,151
Loan Amount												
\$100k or less	56	50.9	3,073	53	49.5	3,431	11,301	92.3	127,478	13,024	93.7	146,345
\$100,001-\$250,000	33	30.0	5,326	28	26.2	4,961	511	4.2	91,455	445	3.2	77,261
\$250,001-\$1mm	21	19.1	9,683	26	24.3	11,837	429	3.5	232,461	424	3.1	222,545
Total	110	100.0	18,082	107	100.0	20,229	12,241	100.0	451,394	13,893	100.0	446,151

The bank’s loans reported under the Home Mortgage Disclosure Act have been included in the Core Tables found in the appendices to this document. As noted previously, the bank’s efforts in this market are focused on its commercial lending operations and not residential real estate lending.

Community Development Lending

During the period under review, the bank originated five community development loans that totaled \$6,167,284. Of these loans, two totaling \$5,962,000 funded projects associated with a plan for a Brownfield redevelopment that was approved by the Brownfield Redevelopment Authority. The remaining three loans funded affordable housing within this assessment area. During the prior period review, the bank originated five community development loans totaling \$12.3 million for Brownfield redevelopment and affordable housing. Although the dollars originated have declined since the prior review, the bank’s record of originating loans for community development purposes is considered good overall based on the responsiveness of the loans to the community development credit needs within the Lansing MSA assessment area.

INVESTMENT TEST

With respect to the investment test, the bank’s performance in the Lansing MSA assessment area is considered good. The bank made qualified investments totaling \$2,187,214 during the review period. Investments have increased by \$278,349 or 14.6 percent since the previous review period. Of the funded investments, \$2,161,040 were ongoing investments from prior periods and \$26,174 were donations and grants. The investments were split almost evenly between mortgage-backed securities comprised of

loans to LMI borrowers and LIHTC projects which helped create or maintain 169 affordable housing units. The majority of the donations were to organizations who provide services to LMI individuals and families.

SERVICE TEST

IUBT's overall service performance for the Lansing assessment area is considered adequate.

Retail Services

The Lansing assessment area consists of 117 tracts, of which 34 are low or moderate income. IUBT's sole Lansing branch is located in an upper-income census tract, which constrains its accessibility to low- or moderate-income individuals somewhat.

However, this issue is partly remedied by the fact that immediately adjacent to the branch office's tract location are several moderate-income census tracts. Within the Lansing MSA, low- or moderate-income households represent 39.0 percent of all households and small businesses (less than or equal to \$1 million in revenues) represent 90.0 percent of all small businesses in the community.

Delivery systems for the bank's various products and services are also accessible to essentially all portions of the bank's assessment area through use of alternative delivery methods. The bank has a full-service ATM at its Lansing branch location. Additionally, the single branch office located in the assessment area represents four percent of IUBT's overall branching network.

Retail services do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate- income geographies and/or low- and moderate-income individuals. The bank's conventional 9:00 a.m. to 5:00 p.m. hours, with no weekend or extended teller hours, may result in low- or moderate-income individuals being unable to use the bank's services because of similar work hours; however, this issue is diminished as the bank has a full service ATM at its location and several moderate-income census tracts are adjacent to the branch office location.

Community Development Services

IUBT provides a relatively high level of community services, given its limited exposure in the market place. The Lansing branch had nine qualified activities totaling 396 hours of community development service.

Many of the services performed by the Lansing staff were performed in a leadership capacity. The combination of its professional expertise and leadership with the various organizations positively affected the activities, as well as, the community in general. The following are examples of some qualified community development services:

Irwin Union Bank & Trust Community Development Services Lansing MSA		
Organization	Mission/Purpose	Service Provided by Bank
Lansing Initiative Support Group	Revitalize LMI neighborhoods that are in economic decline	Board of Director Member
Junior Achievement of Mid-Michigan	Located in Low-Income Tract supporting LMI children with life/jobs skills	Board of Director Member

LIMITED REVIEW – NON-METROPOLITAN MICHIGAN

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NON-METROPOLITAN MICHIGAN ASSESSMENT AREA

IUBT's non-metropolitan Michigan assessment area consists of Benzie, Grand Traverse, Kalkaska and Leelenau counties, which are located in the northwestern portion of the lower peninsula of the state. The bank operates one branch office located in an upper-income census tract. As of June 30, 2007, the bank is ranked eighth of 16 financial institutions in the counties of the non-Metro area combined, with a 3.3 percent deposit market share. (www.fdic.gov).

According to the 2000 census data, the population of the assessment area is 131,342. The largest city in the assessment area is Traverse City with a population of 14,532. There are 36,381 families, 12.9 percent and 17.4 percent of which are low- and moderate-income, respectively. The median family income for the assessment area is \$48,663.

There are 69,273 housing units in the non-metropolitan Michigan assessment area, of which 60.2 percent are owner-occupied. The median housing value for the assessment area is \$119,678. The affordability ratio for this area is 0.41. Compared to the Grand Rapids assessment area, whose affordability ratio is 0.48, homes are less affordable in this assessment area.

The retail sector, which includes a large tourism industry, employs more people than any other industry in the assessment area. Large employers in the area include the following: Sara Lee Bakery, Munson Medical Center, and Meijer Inc. The following table lists the unemployment rate for the counties that comprise this assessment area:

Unemployment Rates for the Michigan Non-Metropolitan Assessment Area (www.bls.com)		
County	Unemployment Rate 2006	Unemployment Rate 2007
Benzie County	7.6	8.0
Grand Traverse County	6.0	6.6
Kalkaska County	7.7	8.0
Leelanau County	5.0	5.4
Michigan	6.9	7.2

Assessment Area Demographics Non- Metropolitan Michigan Assessment Area								
Income Categories	Tract Distribution		Families by Tract Income		Families Below Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	4,679	12.9
Moderate-income	0	0.0	0	0.0	0	0.0	6,334	17.4
Middle-income	21	70.0	22,797	62.7	1,203	5.3	9,067	24.9
TOTALS	30	100.0	36,381	100.0	1,602	4.4	36,381	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Middle-income	47,192	26,388	63.3	55.9	6,804	14.4	14,000	29.7
Upper-income	22,081	15,313	36.7	69.3	3,255	14.7	3,513	15.9
TOTALS	69,273	41,701	100.0	60.2	10,059	14.5	17,513	25.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Under \$1 million		Over \$1 million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Middle-income	204	60.0	200	60.8	1	14.3	3	75.0
Upper-income	136	40.0	129	39.2	6	85.7	1	25.0
TOTALS	340	100.0	329	100.0	7	100.0	4	100.0
Percentage of Total Businesses:					96.8		2.1	1.2

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance in the non-metro areas of Michigan was evaluated using limited-scope examination procedures. The bank's lending performance is considered to be above the performance for the state overall, the investment performance is below the state's rating and the service test performance is consistent with the state's rating overall.

LENDING TEST

The bank's performance under the lending test for the non-metro assessment area is considered above its performance under the lending test for the state of Michigan. In 2007, the bank originated 62 loans to small businesses in the four counties that comprise the Michigan non-metro assessment area. Of these loans, 51 or 82.3 percent were originated to businesses with revenues of \$1 million or less and 11 were originated to borrowers with revenues over \$1 million. The non-metro assessment area has middle-income census tracts only.

Census tracts in Kalkaska and Benzie Counties were designated as distressed middle-income census tracts in 2007 based on unemployment rates; census tracts in Kalkaska were also designated distressed middle-income census tracts in 2006. During the period under review, the bank originated 11 loans to small businesses, totaling \$4,709,000, and one conventional mortgage loan totaling \$36,000 in Kalkaska County. In Benzie County, the bank originated one loan to a small business totaling \$39,000 and one FHA residential real estate loan totaling \$71,000.

The bank's residential real estate lending reportable under the HMDA totaled eight in 2007, two of which were to moderate-income borrowers; the bank did not originate any loans to low-income borrowers. The bank's residential real estate lending for 2007 was also reviewed. The number of loans originated was very limited and did not receive weight in determining the bank's assessment area.

The bank originated two community development loans in the non-metro assessment area in 2006 totaling \$3.5 million; the loans funded affordable housing and community services. In 2007, the bank originated one loan for \$431,900 in the non-metro assessment

area; it funded community services provided to LMI individuals in the assessment area. The bank also funded eight SBA loans in the non-metro assessment area in 2006 totaling \$2,034,000 and eight loans in 2007 totaling \$2,305,100.

INVESTMENT TEST

The bank's performance in the non-metropolitan Michigan assessment area is below the state rating of "high satisfactory" for the investment test. The bank funded investments of \$1,030,381 during the period under review. Investments have decreased by \$235,925 or 18.6 percent since the previous review period. Of the funded investments, \$1,011,160, were ongoing investments from the previous period and \$19,221 were donations and grants. The majority of the dollars were invested in two funds that helped subsidize 48 affordable housing units for LMI individuals and families. The majority of donations were to organizations that provided services to LMI individuals and families.

SERVICE TEST

IUBT's performance in the non-metropolitan assessment area is considered consistent with the bank's performance in the state of Michigan. The sole non-metropolitan assessment area branch is located in an upper-income census tract, although this is mitigated by the fact that there are no low- or moderate-income census tracts in the assessment area. However, 31.0 percent of households have low and moderate incomes. The single branch located in the assessment area represents four percent of IUBT's overall branching network. Employees of this branch participated in six community development activities for a total of 232 service hours.

IUBT's service performance for non-metropolitan Michigan assessment area is consistent with the institution's service performance for the state of Michigan.

STATE – NEVADA

CRA RATING FOR NEVADA:

The lending test is rated: Low Satisfactory

The investment test is rated: High Satisfactory

The service test is rated: Low Satisfactory

The bank's rating has been based on the following factors:

- The level of the bank's lending is considered good overall;
- The distribution of the bank's small business loans by income level of the census tract is considered adequate;
- The distribution of the bank's small business loans by revenue level of the borrower is considered poor;
- The bank's community development lending is considered good based on the increase in the dollars lent and the focus on affordable housing development and revitalization and stabilization efforts;
- The bank's qualified investments are considered good based on its significant use of innovative and complex investment vehicles, the increase in the amount invested and the bank's focus on affordable housing development;
- Services are generally accessible to all parts of the bank's assessment areas, including low- and moderate-income areas, consistent with the bank's presence in Nevada; and
- The provision of community development services is considered poor.

SCOPE OF EXAMINATION

A full-scope review was conducted for the Las Vegas MSA assessment area and a limited scope examination was conducted for the Carson City MSA assessment area within the state of Nevada. The bank's rating for the state of Nevada is based on the review of its performance in the Las Vegas MSA assessment area. The data reviewed included the bank's 2006 and 2007 residential real estate loans and loans to small businesses collected under the Home Mortgage Disclosure Act and the Community Reinvestment Act, respectively. Residential real estate loans originated by IMC during

the first half of 2006 and reported under the HMDA were also reviewed. Community development loans originated during 2006 and 2007 were reviewed for number, amount and responsiveness to community development credit needs. The 2006 and 2007 qualified investments were reviewed for number, amount, innovativeness and complexity. The bank's branch office and ATM networks were reviewed for accessibility to the assessment areas, including low- and moderate-income areas, products and services offered were reviewed for applicability to LMI households/individuals, hours and community development services were reviewed for responsiveness to LMI households/individuals.

Although loan data from 2006 was reviewed, the evaluation presents 2007 data only. This data accurately reflects the pattern of the bank's lending within its assessment areas.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NEVADA

IUBT has a limited presence in the state of Nevada. The bank has two of its 23 branch offices located in Nevada, both of which are located in middle-income census tracts. Additionally, the bank has one full-service ATM located in the state as well. According to data compiled by the FDIC, as of June 30, 2007, IUBT ranked fifteenth of 60 institutions in the state for deposit market share with 0.29 percent of the total deposits. Overall, \$547 million or 19.0 percent of the bank's deposits are located in Nevada.

The combined Nevada assessment areas encompass 355 census tracts, based upon 2000 census data. Of these census tracts, six (or 1.7 percent) are designated as low income, and 80 (or 22.5 percent) as moderate income.

As of 2006, accommodation and food services was the largest employer by industry sector, followed by construction, and retail trade. Top employers include the Bellagio Hotel, Wynn Las Vegas, and the US Air Force. Unemployment for the state of Nevada increased slightly from 4.2 percent in 2006 to 4.8 percent in 2007, demonstrating a higher-paced rate of movement in comparison to the annual average of 4.6 percent in both 2006 and 2007 (www.bls.gov). Table 19 provides a summary of the information.

Unemployment Rates for the Nevada Assessment Area		
County	Unemployment Rate 2006	Unemployment Rate 2007
Carson City	4.8	5.2
Las Vegas	4.2	4.8
Nevada	4.2	4.8
National Average	4.6	4.6

The Nevada assessment area includes the Las Vegas MSA, which consists solely of Clark County and is located in the southern portion of the state. The assessment area also includes the Carson City MSA, which consists solely of Carson City, located in the western portion of the state. Exhibit 10 provides demographic information for the bank's combined assessment areas in the state.

Exhibit# 10									
Assessment Area Demographics Combined Nevada Assessment Areas									
Income Categories	Tract Distribution		Families by Tract Income		Families Below Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	6	1.7	3,941	1.1	1,129	28.6	66,517	18.7	
Moderate-income	80	22.5	86,161	24.2	14,276	16.6	66,714	18.7	
Middle-income	153	43.1	155,573	43.7	9,428	6.1	83,370	23.4	
Upper-income	112	31.5	110,163	31.0	2,978	2.7	139,237	39.1	
Unknown	4	1.1	0	0.0	0	0.0	0	0.0	
TOTALS	355	100.0	355,838	100.0	27,811	7.8	355,838	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-occupied			Rental		Vacant		
		#	%	%	#	%	#	%	
Low-income	10,600	841	0.3	7.9	8,361	78.9	1,398	13.2	
Moderate-income	160,925	50,602	16.0	31.4	94,044	58.4	16,279	10.1	
Middle-income	249,134	143,716	45.5	57.7	86,714	34.8	18,704	7.5	
Upper-income	160,080	120,410	38.2	75.2	27,716	17.3	11,954	7.5	
Unknown Income	343	0	0.0	0.0	20	5.8	323	94.2	
TOTALS	581,082	315,569	100.0	54.3	216,855	37.3	48,658	8.4	
	Total Businesses by Tract		Businesses by Tract & Revenue Size						
			Under \$1 million		Over \$1 million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low-income	1,780	3.1	1,555	3.1	184	3.4	41	2.7	
Moderate-income	12,072	20.9	10,476	20.6	1,219	22.8	377	25.3	
Middle-income	22,946	39.7	20,294	39.9	2,078	38.8	574	38.5	
Upper-income	20,708	35.9	18,395	36.1	1,836	34.3	477	32.0	
Unknown-income	251	0.4	191	0.4	37	0.7	23	1.5	
TOTALS	57,757	100.0	50,911	100.0	5,354	100.0	1,492	100.0	
Percentage of Total Businesses:					88.1		9.3		2.6

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance in the state of Nevada is considered adequate overall. The bank's performance under the lending and service tests is considered adequate while its performance under the investment test is considered good. The bank's ratings were based on its performance during the two-year period under review (2006-07), pertinent demographic characteristics and relevant economic conditions. Also considered were the bank's strategic goals within its Nevada assessment areas, branch/ATM locations and competitive factors.

LENDING TEST

The bank's performance under the lending test is considered adequate. The bank's level of lending is considered good given its presence within Nevada. Its distribution of loans among census tracts and borrowers of different income and revenue levels is considered adequate and poor, respectively. The bank's community development lending is considered good based on the increase from the prior period and the focus on affordable housing. The bank's SBA lending is consistent with its focus on commercial lending in the state and is considered adequate.

Lending Activity

The bank originated 176 CRA-reportable loans to small businesses, totaling \$48.1 million, during the period under review. It also originated 22 residential real estate loans, totaling \$6.8 million, reportable under the HMDA. IMC originated 107 loans totaling \$22.8 million during the first six months of 2006 in the bank's assessment areas in the state of Nevada. During the prior review period (2004-05), the bank originated 143 CRA-reportable loans to small businesses totaling \$35.6 million and 540 residential real estate loans totaling \$98.4 million, including loans originated by IMC. The bank originated four SBA loans, totaling \$6,756,700, in Nevada for the period under review. Two of the four loans originated were in Nevada but not within either of the two assessment areas maintained by the bank. The bank's use of SBA loan programs is consistent with its focus on commercial lending operations and is considered adequate within the state of Nevada.

Overall, the bank's level of lending is considered good based on the increase in small business lending from the prior review period, which is slight but significant given the competitive environment in which the bank operates, economic conditions in Nevada and the bank's decision to focus on commercial lending operations in the state.

Geographic and Borrower Distribution

The distribution of the bank's loans to small businesses by income level of the census tract in which the business is located is considered adequate. The distribution of the bank's loans to small businesses based on the revenue level of the borrower is considered poor based on the improved performance in 2007. The bank's HMDA-reportable residential real estate lending, although reviewed, did not receive significant weight in drawing conclusions about the bank's operations in this state. The bank's rating is based primarily on its performance in the Las Vegas MSA assessment area assessment area that was subject to a full-scope review.

The following tables summarize the bank's lending within low- and moderate-income census tracts and to low- and moderate-income borrowers and small businesses. Within the sections of this report for each individual assessment area, the bank's complete record of loan distribution by tract and borrower income or revenue level is presented and discussed in more detail. The bank's lending distribution is also presented in the Core Tables included in the appendices to this evaluation.

Irwin Union Bank & Trust Company Loans to Small Businesses Reported under the CRA By Tract Income Level (Dollars are in Thousands)												
Assessment Area	2006				2007				Combined Total			
	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$
State of Nevada Combined	3	1,775	19	3,893	2	1,190	18	4,799	5	2,965	37	8,692
Carson City MSA*	N/A	N/A	2	160	0	0	5	510	N/A	N/A	7	670
Las Vegas MSA	3	1,775	14	3,383	2	1,190	16	4,639	5	2,965	30	8,022
Note: The Carson City MSA assessment area does not have any low-income census tracts and only one moderate-income census tract.												

Irwin Union Bank & Trust Company Columbus, Indiana Residential Real Estate Loans Reported Under HMDA By Tract Income Level (Dollars are in Thousands)												
Assessment Area	2006				2007				Combined Total			
	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$
State of Nevada Combined	0	0	1	756	0	0	1	471	0	0	2	1,227
Carson City MSA*	N/A	N/A	0	0	N/A	N/A	0	0	N/A	N/A	0	0
Las Vegas-Paradise MSA	0	0	1	756	0	0	1	471	0	0	2	1,227
Note: The Carson City MSA assessment area does not have any low-income census tracts and only one moderate-income census tract.												

Irwin Union Bank and Trust Company Columbus, Indiana Loans to Small Businesses Reported under the CRA By Borrower Revenue Level (Dollars are in Thousands)												
Assessment Area	2006				2007				Combined			
	Loans to Businesses		Loans to Businesses w/Rev of \$1mm or less		Loans to Businesses		Loans to Businesses w/Rev of \$1mm or less		Loans to Businesses		Loans to Businesses w/Rev of \$1mm or less	
	#	\$	#	\$	#	\$	#	\$	#	\$	#	\$
NV Combined	85	21,968	38	8,589	91	26,125	40	11,298	176	48,093	78	19,887
Las Vegas-Paradise MSA	51	14,713	17	3,608	66	20,049	24	7,647	117	34,762	41	11,255
Carson City MSA	34	7,255	21	4,981	25	6,076	16	3,651	59	13,331	37	8,632

Irwin Union Bank & Trust Company Columbus, Indiana Residential Real Estate Loans Reported Under HMDA Borrower Income Level (Dollars are in Thousands)												
Assessment Area	2006				2007				Combined Total			
	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$	Low #	Low \$	Mod #	Mod \$
State of Nevada Combined	0	0	0	0	1	74	2	124	1	74	2	124
Carson City MSA*	0	0	0	0	1	74	2	124	1	74	2	124
Las Vegas-Paradise MSA	0	0	0	0	0	0	0	0	0	0	0	0

The bank's record of lending in the state of Nevada, although demonstrating improved numbers over the prior period, continues to represent just 6.8 percent of the institution's loans to small businesses reported under the CRA and 1.7 percent of the residential real estate loans reported under the HMDA and originated directly by the bank. Based on its limited loan volume, the bank's distribution among census tracts of different income levels and borrowers of varying revenue levels is considered adequate and poor, respectively.

Community Development Lending

The bank's record of originating community development loans is considered good. The bank originated 11 loans totaling \$10.8 million during the current review period. Of these loans, nine were originated by the bank's office in the Carson City MSA; one of these loans was within the Carson City assessment area, all others were located outside the assessment area. All nine were for affordable housing. The bank's Las Vegas office originated two of the 11 loans totaling \$9.7 million for revitalization and stabilization efforts within the Las Vegas-Paradise assessment area. During the prior review period, the bank originated four community development loans for \$5.0 million, all of which were for affordable housing.

INVESTMENT TEST

The investment test rating for the Nevada assessment areas is considered good. The bank made a significant level of qualified investments during this evaluation period. The bank's qualified investments totaled \$2,593,707; this is a significant increase of \$1,855,254 or 251.2 percent since the previous period. Of the bank's investments in the state of Nevada, \$1,125,000 were new investments, \$1,308,027 were ongoing investments from prior periods, and \$35,680 were donations and grants.

Qualified investments included significant use of innovative and complex investment programs. Similar to the Indiana and Michigan assessment areas, the bank invested in several projects that used LIHTCs to fund construction of or the maintenance of affordable housing and to subsidize the down payment and closing costs for LMI borrowers. As a result of one of the bank's investments, which helped fund affordable housing for LMI senior citizens, IUBT earned a Bank Enterprise Award (BEA) from the

Department of the Treasury. The BEA program provides monetary awards in order to increase community development activities. The bank also invested in mortgage-backed securities comprised of loans to LMI borrowers and other funds targeted towards affordable housing. The bank's donations and grants are primarily targeted to community organizations that provide services to LMI individuals and families.

The bank's level of qualified investments represents good responsiveness to the community development needs within its assessment areas in the state of Nevada. Low-income housing for seniors was an expressed need in the city of Las Vegas and the bank's investment activities in the state helped meet that need.

SERVICE TEST

IUBT's overall service performance in the state of Nevada is adequate based on the bank's retail delivery systems, the products and services it offers, and the level of bank involvement in community development services. As a result of the bank's limited presence in the state of Nevada, the Nevada rating had very little impact on the overall service test rating.

The bank's retail delivery systems are reasonably accessible to essentially all portions of the Nevada assessment areas. The bank has two branches in the state of Nevada, with none located in low- and moderate-income geographies, and one full-service ATM located in Carson City - a middle-income geography.

Banking services and business hours do not vary in a way that inconveniences any portion of the assessment areas, including low- and moderate-income geographies and individuals. The bank's officers and staff participated in four community development services in 2006 for a total of 756 hours. In 2007, the bank's officers and staff participated in five community development services for a total of 816 hours.

Please refer to the individual assessment areas for additional details on the community development services provided.

FULL REVIEW – LAS VEGAS ASSESSMENT AREA

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LAS VEGAS ASSESSMENT AREA

The bank operates one branch office within the Las Vegas assessment area, located in a middle-income census tract. As of June 30, 2007, the bank ranks thirteenth of 47 institutions in the assessment area with a deposit market share of 0.27 percent (fdic.gov)

The assessment area consists of Clark County, which is located in the Las Vegas Nevada MSA, and has a population of 1,375,765, based on 2000 census data. The largest city in the assessment area is Las Vegas, with a population of 552,539 (U.S. Census Bureau, 2006 population estimates). There are 342,405 families in the assessment area, 18.7 percent and 18.7 percent of which are low- and moderate-income, respectively. The median family income for the assessment area is \$60,859. (U.S. Census Bureau, 2006 Estimate)

Based on 2000 census data, there are 559,799 housing units in the assessment area, of which 54.1 percent are owner-occupied. The median housing value for the assessment area is \$132,186. The affordability ratio for this area is 0.33 which is the same as the affordability ratio of the state of Nevada. Homes in this assessment area are more affordable than the Carson City assessment area which has an affordability ratio of 0.30.

Retail trade is the largest employer by sector, followed by professional, scientific & technical services, and then health care and social assistance (Clark County NV economic profile as of 2005 census). Top employers include Sunterra Corporation, Primadonna Company & LLC, Community College of Southern Nevada, and National Security Technologies LLC (Clark County NV Top 10 employers as of 1/01/08). The unemployment rate of the assessment area increased from 4.2 percent in 2006 to 4.8 percent in 2007. This increase mirrors the unemployment rate for the entire state which showed the same increase of 0.6 percent during the same time period (www.bls.gov).

The following provides additional demographic information for the Las Vegas MSA assessment area.

Exhibit# 11								
Assessment Area Demographics Las Vegas Assessment Area								
Income Categories	Tract Distribution		Families by Tract Income		Families Below Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	1.7	3,941	1.2	1,129	28.6	64,023	18.7
Moderate-income	79	22.9	84,913	24.8	14,189	16.7	64,193	18.7
Middle-income	147	42.6	146,215	42.7	8,723	6.0	80,375	23.5
Upper-income	109	31.6	107,336	31.3	2,845	2.7	133,814	39.1
Unknown-income	4	1.2	0	0.0	0	0.0	0	0.0
TOTALS	345	100.0	342,405	100.0	26,886	7.9	342,405	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	10,600	841	0.3	7.9	8,361	78.9	1,398	13.2
Moderate-income	158,706	49,749	16.4	31.3	92,843	58.5	16,114	10.2
Middle-income	234,391	134,991	44.6	57.6	81,434	34.7	17,966	7.7
Upper-income	155,759	117,261	38.7	75.3	26,753	17.2	11,745	7.5
Unknown-income	343	0	0.0	0.00	20	5.8	323	94.2
TOTALS	559,799	302,842	100.0	54.1	209,411	37.4	47,546	8.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Under \$1 million		Over \$1 million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	1,780	3.3	1,555	3.2	184	3.6	41	2.9
Moderate-income	11,805	21.6	10,237	21.3	1,200	23.6	368	26.4
Middle-income	20,682	37.9	18,273	38.0	1,901	37.3	508	36.4
Upper-income	20,050	36.7	17,822	37.1	1,773	34.8	455	32.6
Unknown-income	251	0.5	191	0.4	37	0.7	23	1.6
TOTALS	54,568	100.0	48,078	100.0	5,095	100.0	1,395	100.0
Percentage of Total Businesses:					88.1		9.3	2.6

Conclusions With Respect to Performance Tests in the Las Vegas Assessment Area

The bank's performance under the lending and service tests is considered adequate and its performance under the investment test is considered good. The data upon which the conclusions have been drawn is presented in the following sections.

Lending Activity

The bank originated 117 CRA-reportable loans to small businesses totaling \$34.8 million and 20 HMDA-reportable residential real estate loans totaling \$2.1 million during the period under review. This level of lending represented 4.5 percent of the bank's lending to small businesses and 1.5 percent of its residential real estate lending. The bank originated two SBA loans in this assessment area to help meet the credit needs of smaller businesses. The loans totaled \$6,345,000. The bank also originated two community development loans totaling over \$9.7 million for revitalization and stabilization activities within the Las Vegas MSA assessment area. Both loans were originated in 2007. During the prior review period, the bank originated 82 loans to small businesses reported under the CRA, totaling \$25.6 million, and 529 loans for residential real estate reported under the HMDA, totaling \$96.4 million. The bank also originated two community development loans totaling \$4.9 million that supported affordable housing development. The bank's lending activity is considered good based on the increase in the number of small business loans and the increase in dollars lent for community development purposes. The decline in residential real estate lending was anticipated with the sale of IMC and the re-focusing of the bank's efforts on its commercial lending operations in Nevada.

Geographic Distribution

The bank's record of lending to businesses in census tracts of different income levels, during the review period, is presented in the following two tables.

Irwin Union Bank & Trust Columbus, Indiana NV Las Vegas MSA Loans to Small Businesses, 2006 Geographic Distribution								
Income Level of Tract	Bank Loans			Aggregated Loans			Businesses	
	#	%	\$ (000's)	#	%	\$ (000's)	#	%
Low	3	5.9	1,775	1,716	1.9	39,305	1,780	3.3
Moderate	14	27.5	3,383	12,547	13.9	253,241	11,805	21.6
Middle	12	23.5	4,192	33,041	36.6	641,136	20,682	37.9
Upper	22	43.1	5,363	41,599	46.1	759,517	20,050	36.7
Unknown	-0-	-0-	-0-	121	0.1	1,894	-0-	-0-
Tract Unknown	-0-	-0-	-0-	1,196	1.3	18,533	251	0.5
Total	51	100.0	14,713	90,220	100.0	1,713,626	54,568	100.0

Irwin Union Bank & Trust Columbus, Indiana NV Las Vegas MSA Loans to Small Businesses, 2007 Geographic Distribution								
Income Level of Tract	Bank Loans			Aggregated Loans			Businesses	
	#	%	\$ (000's)	#	%	\$ (000's)	#	%
Low	2	3.0	1,190	1,586	1.6	42,983	1,780	3.3
Moderate	16	24.2	4,639	11,948	12.1	281,124	11,805	21.6
Middle	27	40.9	10,780	36,588	36.9	706,679	20,682	37.9
Upper	21	31.8	3,440	47,273	47.7	875,994	20,050	36.7
Unknown	-0-	-0-	-0-	149	0.2	5,164	-0-	-0-
Tract Unknown	-0-	-0-	-0-	1,487	1.5	23,173	251	0.5
Total	66	100.0	20,049	99,031	100.0	1,935,117	54,568	100.0

The bank's volume of lending is relatively low, making comparisons to the aggregated lender's levels of lending and the presence of businesses difficult. In terms of the distribution of the bank's loans among census tracts of different income levels as a percentage of its total lending, the bank's distribution is good among moderate-income census tracts and poor among low-income census tracts.

Overall, the bank has 341 census tracts of all income levels within this assessment area.

For the period under review, the bank originated loans in 11.0 percent of the census tracts. The bank is too small within this market to effectively serve the entire MSA. However, the distribution of the bank's lending shows that it originated loans in three of six low-income census tracts (50.0 percent); eight of 79 moderate-income census tracts (10.9 percent); 10 of 147 middle-income census tracts (6.8 percent); and 16 of 109 upper-income census tracts (14.7 percent). With the exception of the low-income census tracts, the bank's rates of penetration within census tracts by income level are fairly consistent across this MSA assessment area. The bank penetrated half of the low-income census tracts included within this assessment area. Based on this analysis and considering the bank's size in this market, the bank's performance is considered adequate. The bank's loans reported under the Home Mortgage Disclosure Act are included in the Core Tables, located in the appendices of this document. The level of the bank's residential real estate lending was insignificant within this assessment area and therefore did not receive weight in assigning the overall rating or the rating for the state of Nevada.

Borrower Distribution

The following table presents the distribution of the bank's loans to small businesses by revenue level of the business and the origination amount of the loan.

Irwin Union Bank & Trust Columbus, Indiana NV Las Vegas MSA Loans to Small Businesses. 2006-07 Distribution by Borrower Revenue Level & Loan Amount												
Revenue Level	2006			2007			Aggregate 2006			Aggregate 2007		
	#	%	\$	#	%	\$	#	%	\$	#	%	\$
\$1mm or less	17	33.3	3,608	24	36.4	7,647	37,705	41.8	831,652	44,159	44.6	891,734
Over \$1mm	34	66.7	11,105	42	63.6	12,402	52,515	58.2	871,974	54,873	55.4	1,043,383
Unknown Income	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-
Total	51	100.0	14,713	66	100.0	20,049	90,220	100.0	871,974	99,031	100.0	1,935,117
Loan Amount												
\$100k or less	19	37.3	924	23	34.8	1,448	88,104	97.7	903,774	96,727	97.7	1,063,959
\$100,001-\$250,000	16	31.4	3,237	15	22.7	3,000	1,048	1.2	193,326	1,088	1.1	195,390
\$250,001-\$1mm	16	31.4	10,552	28	42.4	15,601	1,068	1.2	616,526	1,216	1.2	675,768

Total	51	100.0	14,713	66	100.0	20,049	90,220	100.0	1,713,626	99,031	100.0	1,935,117
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As can be seen from the data, the bank originated loans at a lower rate to borrowers with revenues of \$1 million or less than the aggregated for both years under review. Again, the level of lending was relatively low overall and therefore comparisons to the aggregated lenders are more difficult to make. However, the level of the bank's lending to borrowers with revenues of \$1 million or less compared to its originations of loans to borrowers with revenues that exceed \$1 million shows that the bank's commercial lending operations have yielded results with a greater emphasis on larger companies. The bank's performance is considered poor. The bank's record of lending to businesses by income level of the census tract received greater weight for the purposes of this evaluation.

The bank's record of originating loans reported under the Home Mortgage Disclosure Act has been included in the Core Tables found in the appendices to this document.

Community Development Lending

The bank's record of originating community development loans is considered good. The bank originated two loans totaling \$9,721,250 during the period under review. Both loans were originated in 2007 and both funded housing units within an area that has been designated for redevelopment. The housing units are part of a mixed-income housing development intended to attract new residents to an LMI area designated for redevelopment.

INVESTMENT TEST

The bank's performance in the Las Vegas, Nevada assessment area is considered good. The bank funded investments of \$1,883,035 during the review period. Investments have increased by \$1,471,324 or 357.4 percent since the previous review period. Of the funded investments, \$622,855 represented ongoing investments from prior periods, \$1,250,000 represented new investments, and \$10,180 represented donations and grants. The majority of the investment dollars went to an innovative and complex project that

created a 100-unit affordable housing project for LMI seniors. The land was sold at a reduced price by government agency to a non-profit housing developer. Financing for the project was made available through a loan from a CDFI, and equity investments made by Irwin Union Bank & other financial institutions using LIHTCs. The majority of the donations were to organizations that provide services to LMI individuals and families.

SERVICE TEST

IUBT's overall service performance in the Las Vegas assessment area is considered adequate based on a review of the bank's products and services, branch office and ATM locations, hours of operation and provision of community development services. The data on which the conclusions have been based are presented in the following discussion.

Retail Services

The level of retail services in the assessment area is adequate. The bank's products and services are reasonably accessible to all portions of its assessment area and individuals of different income levels. As of December 31, 2007, the bank operated one branch office within the assessment area, located within a middle-income census tract. The total branch offices in this assessment area represent 4.0 percent of all the bank's offices. The bank has no proprietary ATM available in the assessment area; however, customers have the ability to use all non-proprietary ATMs with all fees waived up to a \$50 limit.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems. No branch offices were opened since the previous evaluation. As of December 31, 2007, there were no branch offices located in a low- or moderate-income census tract. In addition to its branch and ATM network, the bank also serves its customer base through the following:

- Ready Banking
- PC Banking
- Call Center and Loan-by-Phone

Hours of operation are considered reasonable and do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts. Typical lobby hours on Monday through Friday are 9:00 a.m. to 4:00 p.m.

Community Development Services

Community development services are considered poor because the bank provides a limited level of community development services within the assessment area. Although the bank has increased the level of community development services since the last examination, the level of increase and the extent to which community development services are provided to each organization is inadequate. In 2006 and 2007, the bank provided community development services through two qualified activities totaling 42 hours per month in the Las Vegas assessment area. The services are provided through employee involvement in a leadership capacity relating to banking and financial services at the Family & Child Treatment Center of Southern Nevada (40 hours), as well as employee involvement with Consumer Credit Counseling Services (2 hours).

LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CARSON CITY ASSESSMENT AREA

IUBT operates one branch office and one full-service ATM in the Carson City assessment area, located in a middle-income census tract. According to the June 30, 2007 FDIC Market Share Report, the bank ranks sixth of 15 institutions in the assessment area with a deposit market share of 6.9 percent.

The population of the assessment area is 52,457 (based on 2000 census information). The Carson City Nevada assessment area consists solely of Carson City. There are 13,433 families in the assessment area, 18.6 percent and 18.8 percent of which are low- and moderate-income, respectively (based on 2000 census information). The median family income for the MSA is \$49,627 (based on 2000 census information).

There are 21,283 housing units in the assessment area, of which 59.8 percent are owner-occupied. The median housing value for the assessment area is \$136,268. The affordability ratio for this area is 0.30. Compared to the Las Vegas assessment area's affordability ratio of 0.33, homes in the Carson City area are generally less affordable based on 2000 census information.

The professional, scientific & technical services industries are the largest in the assessment area followed by retail trade, and then construction (Carson City County, NV Economic Profile as of 2005 Census). Large employers include the State of Nevada, Executive Office of the State of Nevada, Department of Health & Human Services, and Nevada Department of Corrections (Carson City County, NV Top 10 employers as of 1/1/08)). The unemployment rate in the Carson City MSA increased from 4.8 percent in 2006 to 5.2 percent in 2007 (www.bls.gov). Exhibit 12 provides additional demographic information for the Carson City assessment area.

Exhibit # 12								
Assessment Area Demographics Carson City								
Income Categories	Tract Distribution		Families by Tract Income		Families Below Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	2,494	18.6
Moderate-income	1	10.0	1,248	9.3	87	7.0	2,521	18.8
Middle-income	6	60.0	9,358	69.7	705	7.5	2,995	22.3
Upper-income	3	30.0	2,827	21.0	133	4.7	5,423	40.4
TOTALS	10	100.0	13,433	100.0	925	6.9	13,433	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Moderate-income	2,219	853	6.7	38.4	1,201	54.1	165	7.4
Middle-income	14,743	8,725	68.6	59.2	5,280	35.8	738	5.0
Upper-income	4,321	3,149	24.7	72.9	963	22.3	209	4.8
TOTALS	21,283	12,727	100.0	59.8	7,444	35.0	1,112	5.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Under \$1 million		Over \$1 million		Revenue Not Reported	
			#	%	#	%	#	%
Moderate-income	267	8.4	239	8.4	19	7.3	9	9.3
Middle-income	2,264	71.0	2,021	71.3	177	68.3	66	68.0
Upper-income	658	20.6	573	20.2	63	24.3	22	22.7
TOTALS	3,189	100.0	2,833	100.0	259	100.0	97	100.0
Percentage of Total Businesses:					88.8		8.1	3.0

Conclusions With Respect to Performance Tests in the Carson City Assessment Area

The bank's record of performance under the lending test is above the performance for the state of Nevada, while the investment and service tests are consistent with the bank's ratings for the state of Nevada overall. The data on which the conclusions are based are presented in the following discussion.

Lending Test

The bank's lending activity is considered consistent with the bank's performance in the state of Nevada. The bank originated 59 loans to small businesses totaling \$13,331,000 and three residential real estate loans totaling \$727,000 during 2006-07. Of the 59 loans originated, seven or 11.9 percent were originated to businesses in moderate-income census tracts; the loans totaled \$670,000. The bank originated 37 loans to businesses with revenues of \$1 million or less; the loans totaled \$8,632,000. In addition, the bank originated nine community development loans totaling \$1,036,696 for affordable housing development.

Investment Test

The bank's performance in the Carson City Nevada assessment area is consistent with the state rating of "high satisfactory." The bank funded investments of \$710,652 during the review period. Investments have increased by \$383,930 or 117.5 percent since the previous review period. Of the funded investments, \$685,172 were ongoing investments from prior periods and \$25,500 were donations and grants. The majority of the investment dollars went to help subsidize a 47-unit affordable housing project for LMI individuals. The majority of the donations were to organizations that provide affordable housing to LMI individuals and families.

Service Test

The bank's overall service performance in this assessment area is consistent with that of the state. IUBT operates one branch office and one full-service ATM in the assessment area, located in a middle-income census tract. There are no low-income census tracts located in this assessment area. Of the families within the assessment area, 9.3 percent are moderate income. Although there are no branch offices in moderate-income areas, moderate-income members of the assessment area have access to the bank's services. Services are tailored to the conveniences and needs of the assessment area.

In 2006, the bank provided community development services through four qualified activities totaling 21 hours per month in the Carson City assessment area. In 2007, the bank increased its participation, providing community development services through

five qualified activities totaling 26 hours per month in the Carson City assessment area.

STATE – UTAH

CRA RATING FOR Utah:

The lending test is rated: Low Satisfactory

The investment test is rated: Low Satisfactory

The service test is rated: Low Satisfactory

The bank's rating has been based on the following factors:

- An adequate but limited level of lending within the assessment area overall;
- A good geographic distribution of loans throughout the assessment area overall and specifically within low- and moderate-income census tracts;
- An adequate distribution of loans among borrowers of different income and revenue levels, overall and a good level of distribution among moderate-income borrowers;
- An adequate record of originating community development loans in the assessment area;
- A good level of qualified and responsive investments in the state of Utah;
- Generally accessible branch and ATM network, hours and services that are not inconvenient to LMI areas or populations; and
- Generally responsive community development services in number and quality.

SCOPE OF EXAMINATION

A full-scope review was conducted for the Salt Lake City MSA assessment area which is the only assessment area for the bank in the state of Utah. The data reviewed included the bank's 2006 and 2007 residential real estate loans and loans to small businesses. Residential real estate loans originated by IMC during the first half of 2006 and reported under the HMDA were also reviewed. Community development loans originated during 2006 and 2007 were reviewed for number, amount and responsiveness to community development credit needs.

The 2006 and 2007 qualified investments were reviewed for number, amount, innovativeness and complexity. The bank's branch office and ATM networks were reviewed for accessibility to the assessment areas, including low- and moderate-income areas, products and services offered were reviewed for applicability to LMI households/individuals, hours and community development services were reviewed for responsiveness to LMI households/individuals.

Although loan data from 2006 was reviewed, the evaluation presents 2007 data only. This data accurately reflects the pattern of the bank's lending within its assessment areas.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SALT LAKE CITY ASSESSMENT AREA

IUBT operates one branch and one full-service ATM in the Salt Lake City assessment area, both of which are located in a moderate-income census tract. As of June 30, 2007, the bank ranks forty-fourth of 63 institutions in the assessment area with a deposit market share of .04 percent (FDIC).

The assessment area consists of Salt Lake County which is located in the Salt Lake City MSA and has a population of 898,387, based on 2000 census data. The largest city in the assessment area is Salt Lake City with a population of 178,858 (US Census Bureau 2006 population estimate). There are 215,864 families in the assessment area, 16.7 percent and 19.6 percent of which are low and moderate income, respectively, based on 2000 census data. The median family income for the assessment area is \$54,391, based on 2000 census data.

There are 310,988 housing units in the assessment area, of which 65.5 percent are owner-occupied. The median housing value for the assessment area is \$153,549. The affordability ratio for this area is 0.30, which is slightly lower than the affordability ratio for the entire state of Utah which is 0.32, based on 2000 census data. Therefore, homes in the Salt Lake City assessment area are less affordable than homes in the state of Utah overall.

Professional, Scientific & Technical Services is the largest employer by sector, followed by construction, and then retail trade (Salt Lake County, UT Economic Profile as of 2005 Census). Large employers include the State of Utah, Utah's Governor's Office, and Smith's Food & Drug Centers (Salt Lake County, UT Top 10 Employers as of 1/1/08). The unemployment rate of the assessment area decreased from an annual rate of 2.9 percent in 2006 to an annual rate of 2.6 percent in 2007 (www.bls.gov). This rate mirrors the exact same movement for the unemployment rate of the entire state which decreased from 3.0 percent to 2.7 percent during the same time period. (www.bls.gov).

The following provides additional demographic information for the Salt Lake City MSA assessment area.

Exhibit# 13								
Assessment Area Demographics Salt Lake Assessment Area								
Income Categories	Tract Distribution		Families by Tract Income		Families Below Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	2.6	1,486	0.7	320	21.5	36,086	16.7
Moderate-income	43	22.3	46,752	21.7	5,973	12.8	42,400	19.6
Middle-income	90	46.6	107,901	50.0	4,820	4.5	53,572	24.8
Upper-income	55	28.5	59,725	27.7	1,263	2.1	83,806	38.8
TOTALS	193	100.0	215,864	100.0	12,376	5.7	215,864	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	2,686	432	0.2	16.1	1,899	70.7	355	13.2
Moderate-income	85,792	35,447	17.4	41.3	44,236	51.6	6,109	7.1
Middle-income	148,513	105,628	51.9	71.1	36,858	24.8	6,027	4.1
Upper-income	73,997	62,183	30.5	84.0	8,458	11.4	3,356	4.5
TOTALS	310,998	203,690	100.0	65.5	91,451	29.4	15,847	5.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Under \$1 million		Over \$1 million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	3,071	8.0	2,211	6.6	770	18.5	90	12.0
Moderate-income	9,170	23.7	7,525	22.3	1,410	33.9	235	31.4
Middle-income	15,734	40.7	14,233	42.2	1,241	29.8	260	34.8
Upper-income	10,642	27.6	9,737	28.9	742	17.8	163	21.8
TOTALS	38,617	100.0	33,706	100.0	4,163	100.0	748	100.0
Percentage of Total Businesses:				87.3		10.8		1.9

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance in the state of Utah and the Salt Lake City MSA assessment area is considered adequate overall. The bank's performance under the lending and service tests is considered adequate while its performance under the investment test is considered good. The bank's ratings were based on its performance during the two-year

period under review (2006-07), pertinent demographic characteristics and relevant economic conditions. Also considered were the bank's strategic goals within its Utah assessment area, branch/ATM locations and competitive factors.

LENDING TEST

The bank's performance under the lending test is considered adequate overall based on an adequate level of lending activity, and adequate distribution of loans to census tracts and borrowers of different income and revenue levels. The bank's community development lending is considered adequate.

Lending Activity

The bank's level of lending during the period under review included 84 loans to small businesses totaling \$27.8 million, one residential real estate loan totaling \$98,000 and 360 residential real estate loans originated by IMC during the first six months of 2006 totaling approximately \$59.0 million. The IMC lending was considered a mitigating factor for the purposes of this review. The 2007 data shows that the bank did not replace the home lending activity of the former mortgage subsidiary and management confirmed that the bank intends to meet the credit needs of the business community within this market going forward.

The bank originated one community development loan in support of revitalization and stabilization of the Central Business District of Salt Lake City within this assessment area. The bank originated one SBA loan totaling \$380,000 to benefit a business within the Salt Lake assessment area. The bank's level of lending activity is considered adequate but limited.

Geographic Distribution

The bank's record of originating loans to small businesses was evaluated by reviewing the distribution of loans among census tracts of different income levels. This data is presented in the following two tables.

Irwin Union Bank & Trust Utah/Salt Lake City MSA Loans to Small Businesses, 2006 Geographic Distribution								
Income Level of Tract	Bank Loans			Aggregated Loans			Businesses	
	#	%	\$ (000's)	#	%	\$ (000's)	#	%
Low	3	6.7	1,410	3,107	6.6	121,449	3,071	8.0
Moderate	15	33.3	3,415	10,005	21.2	248,025	9,170	23.7
Middle	20	44.4	6,889	18,676	39.6	343,561	15,734	40.7
Upper	7	15.6	3,165	14,367	30.5	250,271	10,642	27.6
Tract Unknown	-0-	-0-	-0-	955	2.0	17,303	-0-	-0-
Total	45	100.0	14,879	47,110	100.0	980,609	38,617	100.0

Irwin Union Bank & Trust Utah/Salt Lake City MSA Loans to Small Businesses, 2007 Geographic Distribution								
Income Level of Tract	Bank Loans			Aggregated Loans			Businesses	
	#	%	\$ (000's)	#	%	\$ (000's)	#	%
Low	6	15.4	1,630	3,130	5.5	132,198	3,071	8.0
Moderate	15	38.5	5,172	10,658	18.7	268,139	9,170	23.7
Middle	12	30.8	2,873	23,416	41.0	407,782	15,734	40.7
Upper	6	15.4	3,200	18,712	32.8	315,733	10,642	27.6
Tract Unknown	-0-	-0-	-0-	1,204	2.1	23,167	-0-	-0-
Total	39	100.0	12,875	57,120	100.0	1,147,019	38,617	100.0

This review showed that the volume of lending was very low. The distribution of loans among tracts of different income levels within the bank's own lending demonstrated an adequate distribution in comparison to the aggregated lenders and the presence of businesses within the assessment area by income levels of census tracts. Overall, the bank's distribution of loans was adequate.

The bank's Salt Lake City MSA assessment area is comprised of 193 census tracts. The bank originated loans in three of five low-income census tracts (60 percent), eight of 43

moderate-income census tracts (18.6 percent), 17 of 90 middle-income census tracts (18.9 percent) and six of 55 upper-income census tracts (10.9 percent). Given the bank’s limited presence within this market, the dispersion of its loans is considered adequate. The bank’s loans that were reported under the Home Mortgage Disclosure Act (HMDA) are included in the Core Tables found in the appendices of this document. The bank did not originate any residential real estate loans reportable under the HMDA in 2007 and it originated only one loan directly in 2006. However, IMC data showed that the former mortgage subsidiary originated 360 loans reportable under the HMDA in the Salt Lake City MSA assessment area. This data showed that 63 of the loans were originated to borrowers in moderate-income census tracts totaling approximately \$7.7 million; however, none of the loans were originated to borrowers in low-income census tracts. Based on this data, the bank’s performance is considered adequate overall, good in the moderate-income census tracts and poor in the low-income census tracts.

Borrower Distribution

The distribution of the bank’s lending to small businesses based on revenue size of the borrower and original loan amount is presented in the following table.

Irwin Union Bank & Trust Utah/Salt Lake City MSA Loans to Small Businesses. 2006-07 Distribution by Borrower Revenue Level & Loan Amount												
Revenue Level	2006			2007			Aggregate 2006			Aggregate 2007		
	#	%	\$	#	%	\$	#	%	\$	#	%	\$
\$1mm or less	28	62.2	9,661	21	53.8	5,710	17,108	36.3	416,407	20,288	35.5	480,297
Over \$1mm	17	37.8	5,218	18	46.2	7,165	565	1.2	99,200	36,832	64.5	666,722
Unknown Income	-0-	-0-	-0-	-0-	-0-	-0-	667	1.4	365,004	-0-	-0-	-0-
Total	45	100.0	14,879	39	100.0	12,875	47,110	100.0	980,609	57,120	100.0	1,147,019
Loan Amount												
\$100k or less	12	26.7	650	11	28.2	745	45,878	97.4	516,405	55,775	97.6	645,702
\$100,001-\$250,000	10	22.2	1,816	11	28.2	1,933	565	1.2	99,200	610	1.1	103,436
\$250,001-\$1mm	23	51.1	12,413	17	43.6	10,197	667	1.4	365,004	735	1.3	397,881
Total	45	100.0	14,879	39	100.0	12,875	47,110	100.0	980,609	57,120	100.0	1,147,019

Based on this data, the bank’s record of originating loans to small businesses is

considered good with over 50.0 percent of the bank's loans during the review period originated to businesses with revenues of \$1 million or less. The bank did not originate a significant number of its loans in lower dollar amounts.

The bank's residential real estate loans that were reported under the Home Mortgage Disclosure Act have been included in the Core Tables located in the appendices to this document. The bank is committed to meeting the commercial credit needs of its assessment areas but has chosen not to dedicate resources to the home loan market. Therefore, this activity did not receive weight within this evaluation. However, the IMC residential real estate loans from the first six months of 2006 were also reviewed for this assessment area. This data showed that IMC originated 360 loans within this assessment area overall, of which six loans totaling \$568,000 were to borrowers with low incomes and 24 loans totaling \$3.2 million were to borrowers with moderate incomes.

Community Development Lending

The bank originated one qualified community development loan totaling \$5,476,515 to support the revitalization and stabilization of an area in the central business district in Salt Lake City that has been designated for redevelopment. The bank's participation in a loan to help an area designated for redevelopment achieve its goal is considered an adequate level of lending considering the bank's limited presence within this assessment area. The redevelopment plan targets older buildings and unused facilities for rehab and return to economic life. The bank's loan supported this purpose.

INVESTMENT TEST

The bank's performance in the Salt Lake City, Utah, assessment area is considered adequate overall. The bank made an adequate level of qualified investments during this evaluation period. The bank's qualified investments totaled \$640,766. Investments have decreased by \$209,638 or 24.7 percent since the previous examination period. Of the total investments, \$624,236 were for on-going investments and \$16,530 were for grants to organizations that provide services to LMI individuals and families.

The bank made occasional use of complex and innovative investments through use of a

CRA fund, mortgage-backed securities, and loan pools. The bank made a large investment in a CRA fund that provided financing for the purchase of housing by low- and moderate-income individuals. The investment helped provide down payment and closing cost assistance to first-time home buyers. The majority of the donations were to organizations that provide services to LMI individuals and families.

The bank showed adequate responsiveness to assessment area needs. Community contacts indicated that the tightening of credit has hurt many potential first-time homebuyers. The bank's investment in the CRA fund helps address this need.

SERVICE TEST

Overall, the bank's service performance in the Salt Lake City assessment area is considered adequate.

Retail Services

Delivery services are reasonably accessible to the bank's assessment area. The bank's one branch office and ATM in the Salt Lake assessment area is located in a moderate-income census tract. Within the Salt Lake City MSA, low- or moderate-income households represent 38.0 percent of all households and small businesses (less than or equal to \$1 million in revenues) represent 87.0 percent of all small businesses in the community. The branch in this assessment area represents 4.3 percent of all of IUBT's branch office. Services are tailored to the convenience and needs of the assessment area, including low- and moderate-income geographies or individuals.

Community Development Services

Community development services are considered poor based on the bank's very limited provision of community development services within the assessment area. In 2006 and 2007, the bank provided community development services through one qualified activity totaling two hours per month or 48 hours over a two-year period in the Salt Lake City assessment area. The service was provided through employee involvement in a leadership capacity relating to banking and financial services at the Utah Community Reinvestment Corporation. The organization provides affordable housing to LMI individuals.

APPENDIX A

SCOPE OF EXAMINATION TABLE

Large institutions with multiple assessment areas or affiliates subject to examination may warrant the use of charts that convey information regarding the scope of the examination. The following chart may be used as a supplement to the discussion of the scope or in lieu thereof.

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED	01/01/2006 to 12/31/2007		
FINANCIAL INSTITUTION Irwin Union Bank and Trust, Columbus, IN			PRODUCTS REVIEWED Small Business Home purchase, refinance and home improvement loans
AFFILIATE(S)	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED -
Irwin Mortgage Corporation	Bank subsidiary		Mortgage loans (01/01/2006- 06/30/2006)

APPENDIX B

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
<p>INDIANA</p> <p>MSA 14020 Bloomington MSA 18020 Columbus MSA 26900 Indianapolis-Carmel</p> <p>Nonmetropolitan rural Indiana</p>	<p>Full-scope review Full-scope review Full-scope review</p> <p>Limited-scope review</p>	<p>300 6th street Bloomington, IN 47404</p> <p>707 Creekview Dr. Columbus, IN 47201</p> <p>300 N. Meridian Street Indianapolis, IN 46204</p>	<p>The scope included commercial real estate loans, commercial non-real estate loans, home purchase, home improvement and refinance loans, and community development loans.</p>
<p>MICHIGAN</p> <p>MSA 24340 Grand Rapids-Wyoming MSA 28020 Kalamazoo-Portage MSA 29620 Lansing-East Lansing</p> <p>Non-metropolitan rural Michigan</p>	<p>Full-scope review Full-scope review Full-scope review</p> <p>Limited-scope review</p>	<p>2624 Lake Lansing Rd., Lansing MI 48912</p> <p>1717 S. Westnedge Kalamazoo, MI 49008</p>	
<p>NEVADA</p> <p>MSA 16180 Carson City MSA 29820 Las Vegas-Paradise</p>	<p>Limited-scope review Full-scope review</p>		
<p>UTAH</p> <p>MSA 41620 Salt Lake City</p>	<p>Full-scope review</p>		

APPENDIX B cont'd

SUMMARY OF STATE AND MULTISTATE METROPOLITAN AREA RATINGS

State or Multistate Metropolitan Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Indiana	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Michigan	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Nevada	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Utah	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

APPENDIX C

GLOSSARY

Affordability ratio: To determine housing affordability, the affordability ratio is calculated by dividing median family income by median housing value. This ratio allows the comparison of housing affordability across assessment areas and/or communities. An area with a high ratio generally has more affordable housing than an area with a low ratio.

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

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

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

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

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

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

Full-scope review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings 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-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, 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 metropolitan area/assessment area.

Metropolitan area (MSA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with

adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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 multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate 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.

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.

APPENDIX D

Core Tables

Table 1. Lending Volume

LENDING VOLUME		State: ALL		Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007								
MA/Assessment Area	% of Rated Area Loans (#) in MSA/AA***	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans *		Total Reported Loans		% of Rated Area Deposits in MSA/AA**
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full-Review:												
2007 IN Bloomington MSA - 14020	7.66	36	7,987	115	24,956	0	0	0	0	151	32,943	0.00
2007 IN Columbus MSA - 18020	26.83	342	47,453	173	44,250	14	1,702	0	0	529	93,405	0.00
2007 IN Non MSA	10.80	80	7,612	118	17,976	15	2,209	0	0	213	27,797	0.00
2007 Indianapolis - Carmel MSA -	27.48	162	21,661	372	94,273	8	1,383	0	0	542	117,317	0.00
2007 MI Grand Rapids - Wyoming	5.02	10	1,283	89	19,683	0	0	0	0	99	20,966	0.00
2007 MI Kalamazoo - Portage MSA	5.48	12	1,409	96	15,158	0	0	0	0	108	16,567	0.00
2007 MI Lansing - E. Lansing MSA	5.78	7	7,562	107	20,229	0	0	0	0	114	27,791	0.00
2007 MI Non MSA	3.65	8	1,069	62	10,513	2	100	0	0	72	11,682	0.00
2007 NV Carson City MSA - 16180	1.32	1	133	25	6,076	0	0	0	0	26	6,209	0.00
2007 NV Las Vegas - Paradise MSA	4.01	13	4,092	66	20,049	0	0	0	0	79	24,141	0.00
2007 UT Salt Lake City MSA -	1.98	0	0	39	12,875	0	0	0	0	39	12,875	0.00
Limited-Review:												

(*) The evaluation period for Community Development Loans is JANUARY 01, 2007 TO DECEMBER 31, 2007.

(**) Deposit data as of 2007. Rated area refers to either the state or multi-state MSA rating area.

(***) Loan data as of 2007. Rated area refers to either the state or multi-state MSA ratings area.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE														State: ALL		Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007											
MA/Assessment Area	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*																
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp													
Full-Review:																											
2007 IN Bloomington MSA -	18	5.13	0.77	11.11	8.38	11.11	54.51	33.33	36.34	44.44	2.01	12.31	50.51	35.16													
2007 IN Columbus MSA - 18020	217	61.82	0.00	0.00	11.17	7.37	70.83	65.90	18.00	26.73	0.00	10.24	67.69	22.07													
2007 IN Non MSA	31	8.83	0.00	0.00	0.00	0.00	92.79	93.55	7.21	6.45	0.00	0.00	86.95	13.05													
2007 Indianapolis - Carmel MSA -	71	20.23	2.90	1.41	18.11	14.08	49.91	66.20	29.09	18.31	1.95	11.42	48.88	37.76													
2007 MI Grand Rapids - Wyoming	4	1.14	1.06	0.00	12.01	25.00	60.20	75.00	26.74	0.00	1.53	13.20	55.13	30.15													
2007 MI Kalamazoo - Portage	1	0.28	2.27	0.00	11.27	0.00	50.65	0.00	35.81	100.00	1.17	11.70	46.01	41.13													
2007 MI Lansing - E. Lansing	1	0.28	1.72	0.00	13.87	0.00	61.20	100.00	23.22	0.00	2.99	15.50	56.31	25.13													
2007 MI Non MSA	3	0.85	0.00	0.00	0.00	0.00	63.28	66.67	36.72	33.33	0.00	0.00	63.46	36.54													
2007 NV Carson City MSA -	0	0.00	0.00	0.00	6.70	0.00	68.56	0.00	24.74	0.00	0.00	19.54	58.33	22.12													
2007 NV Las Vegas - Paradise	5	1.42	0.28	0.00	16.43	20.00	44.57	80.00	38.72	0.00	0.42	8.02	47.41	43.38													
2007 UT Salt Lake City MSA -	0	0.00	0.21	0.00	17.40	0.00	51.86	0.00	30.53	0.00	0.63	18.71	55.84	24.82													
Limited-Review:																											

(*) Based on 2007 Aggregate HMDA Data only.

(**) Home purchase loans originated and purchased in the MSA/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 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT														State: ALL		Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007			
MA/Assessment Area	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*								
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp					
Full-Review:																			
2007 IN Bloomington MSA -	4	6.15	0.77	0.00	8.38	25.00	54.51	75.00	36.34	0.00	1.37	4.44	61.77	32.42					
2007 IN Columbus MSA - 18020	32	49.23	0.00	0.00	11.17	3.13	70.83	71.88	18.00	25.00	0.00	9.58	69.76	20.66					
2007 IN Non MSA	11	16.92	0.00	0.00	0.00	0.00	92.79	72.73	7.21	27.27	0.00	0.00	88.00	12.00					
2007 Indianapolis - Carmel MSA -	14	21.54	2.90	0.00	18.11	7.14	49.91	85.71	29.09	7.14	3.19	15.86	51.12	29.83					
2007 MI Grand Rapids - Wyoming	0	0.00	1.06	0.00	12.01	0.00	60.20	0.00	26.74	0.00	1.37	10.62	58.99	29.02					
2007 MI Kalamazoo - Portage	1	1.54	2.27	0.00	11.27	0.00	50.65	0.00	35.81	100.00	2.68	12.18	49.93	35.21					
2007 MI Lansing - E. Lansing MSA	0	0.00	1.72	0.00	13.87	0.00	61.20	0.00	23.22	0.00	1.49	13.90	62.89	21.73					
2007 MI Non MSA	0	0.00	0.00	0.00	0.00	0.00	63.28	0.00	36.72	0.00	0.00	0.00	67.19	32.81					
2007 NV Carson City MSA - 16180	0	0.00	0.00	0.00	6.70	0.00	68.56	0.00	24.74	0.00	0.00	11.11	63.16	25.73					
2007 NV Las Vegas - Paradise	3	4.62	0.28	0.00	16.43	0.00	44.57	0.00	38.72	100.00	0.25	11.89	43.85	44.01					
2007 UT Salt Lake City MSA -	0	0.00	0.21	0.00	17.40	0.00	51.86	0.00	30.53	0.00	0.28	13.46	58.99	27.26					
Limited-Review:																			

(*) Based on 2007 Aggregate HMDA Data only.

(**) Home improvement loans originated and purchased in the MSA/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 the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		State: ALL				Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007								
MA/Assessment Area	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:														
2007 IN Bloomington MSA -	13	5.24	0.77	7.69	8.38	7.69	54.51	46.15	36.34	38.46	1.33	7.75	54.72	36.19
2007 IN Columbus MSA - 18020	92	37.10	0.00	0.00	11.17	10.87	70.83	60.87	18.00	28.26	0.00	13.34	65.26	21.40
2007 IN Non MSA	36	14.52	0.00	0.00	0.00	0.00	92.79	80.56	7.21	19.44	0.00	0.00	88.06	11.94
2007 Indianapolis - Carmel MSA -	76	30.65	2.90	0.00	18.11	11.84	49.91	80.26	29.09	7.89	2.33	13.58	49.66	34.42
2007 MI Grand Rapids - Wyoming	6	2.42	1.06	0.00	12.01	33.33	60.20	33.33	26.74	33.33	1.30	12.94	55.20	30.57
2007 MI Kalamazoo - Portage	10	4.03	2.27	0.00	11.27	10.00	50.65	30.00	35.81	60.00	1.19	13.43	46.57	38.81
2007 MI Lansing - E. Lansing MSA	4	1.61	1.72	0.00	13.87	25.00	61.20	50.00	23.22	25.00	2.33	14.47	60.29	22.90
2007 MI Non MSA	5	2.02	0.00	0.00	0.00	0.00	63.28	20.00	36.72	80.00	0.00	0.00	62.34	37.66
2007 NV Carson City MSA - 16180	1	0.40	0.00	0.00	6.70	0.00	68.56	0.00	24.74	100.00	0.00	8.00	66.92	25.08
2007 NV Las Vegas - Paradise	5	2.02	0.28	0.00	16.43	0.00	44.57	60.00	38.72	40.00	0.17	12.53	43.17	44.04
2007 UT Salt Lake City MSA -	0	0.00	0.21	0.00	17.40	0.00	51.86	0.00	30.53	0.00	0.22	14.23	57.66	27.89
Limited-Review:														

(*) Based on 2007 Aggregate HMDA Data only.

(**) Home mortgage refinance loans originated and purchased in the MSA/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 the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY State: ALL Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007														
MA/Assessment Area	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:														
2007 IN Bloomington MSA -	1	14.29	25.20	0.00	18.67	100.00	33.44	0.00	22.69	0.00	35.29	11.76	41.18	11.76
2007 IN Columbus MSA - 18020	1	14.29	0.00	0.00	35.23	100.00	47.85	0.00	16.91	0.00	0.00	33.33	66.67	0.00
2007 IN Non MSA	2	28.57	0.00	0.00	0.00	0.00	93.27	100.00	6.73	0.00	0.00	0.00	90.91	9.09
2007 Indianapolis - Carmel MSA -	1	14.29	6.78	0.00	31.87	0.00	47.43	0.00	13.91	100.00	10.08	28.68	42.64	18.60
2007 MI Grand Rapids - Wyoming	0	0.00	0.79	0.00	18.44	0.00	69.62	0.00	11.14	0.00	0.00	48.65	51.35	0.00
2007 MI Kalamazoo - Portage	0	0.00	10.12	0.00	23.21	0.00	54.93	0.00	11.74	0.00	6.25	56.25	37.50	0.00
2007 MI Lansing - E. Lansing MSA	2	28.57	14.61	0.00	19.45	0.00	46.11	100.00	19.66	0.00	13.46	17.31	40.38	28.85
2007 MI Non MSA	0	0.00	0.00	0.00	0.00	0.00	69.84	0.00	30.16	0.00	0.00	0.00	28.57	71.43
2007 NV Carson City MSA - 16180	0	0.00	0.00	0.00	23.09	0.00	63.04	0.00	13.87	0.00	0.00	27.27	63.64	9.09
2007 NV Las Vegas - Paradise	0	0.00	4.45	0.00	46.20	0.00	37.62	0.00	11.50	0.00	10.34	46.90	35.17	7.59
2007 UT Salt Lake City MSA -	0	0.00	3.33	0.00	52.40	0.00	38.12	0.00	6.15	0.00	0.00	59.63	37.61	2.75
Limited-Review:														

(*) Based on 2007 Aggregate HMDA Data only.

(**) Multifamily loans originated and purchased in the MSA/AA as a percentage of all home 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 the number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES														State: ALL		Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007			
MA/Assessment Area	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*								
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp					
Full-Review:																			
2007 IN Bloomington MSA -	115	9.11	17.01	17.39	11.80	18.26	46.55	40.87	24.65	23.48	12.99	11.86	42.68	29.50					
2007 IN Columbus MSA - 18020	173	13.71	0.00	0.00	29.34	32.95	55.48	53.18	15.18	13.87	0.00	25.96	52.26	19.18					
2007 IN Non MSA	118	9.35	0.00	0.00	0.00	0.00	91.24	79.66	8.76	20.34	0.00	0.00	89.42	7.02					
2007 Indianapolis - Carmel MSA -	372	29.48	3.37	1.61	16.57	10.75	49.31	57.26	30.65	30.38	2.02	12.18	46.34	37.89					
2007 MI Grand Rapids - Wyoming	89	7.05	2.36	0.00	15.54	21.35	52.72	52.81	29.37	25.84	1.95	12.12	51.71	33.42					
2007 MI Kalamazoo - Portage	96	7.61	2.96	1.04	20.77	12.50	46.49	41.67	29.78	44.79	2.45	15.82	45.56	34.50					
2007 MI Lansing - E. Lansing MSA	107	8.48	4.13	4.67	16.93	26.17	52.54	36.45	24.66	29.91	3.71	14.24	51.36	27.83					
2007 MI Non MSA	62	4.91	0.00	0.00	0.00	0.00	66.23	56.45	33.77	43.55	0.00	0.00	60.47	35.82					
2007 NV Carson City MSA - 16180	25	1.98	0.00	0.00	8.37	8.00	70.99	56.00	20.63	36.00	0.00	10.04	66.25	19.66					
2007 NV Las Vegas - Paradise	66	5.23	3.26	3.03	21.63	24.24	37.90	40.91	36.74	31.82	1.60	12.06	36.95	47.74					
2007 UT Salt Lake City MSA -	39	3.09	7.95	15.38	23.75	38.46	40.74	30.77	27.56	15.38	5.48	18.66	40.99	32.76					
Limited-Review:																			

(*) Based on 2007 Aggregate Small Business Data only.

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

(***) Source of DATA - DUN & BRADSTREET 2007.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS														State: ALL		Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007			
MA/Assessment Area	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*								
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Low	Mod	Mid	Upp					
Full-Review:																			
2007 IN Bloomington MSA - 14020	0	0.00	1.14	0.00	4.55	0.00	57.95	0.00	36.36	0.00	0.00	0.00	72.22	27.78					
2007 IN Columbus MSA - 18020	14	35.90	0.00	0.00	2.90	0.00	89.37	85.71	7.73	14.29	0.00	0.00	94.20	5.80					
2007 IN Non MSA	15	38.46	0.00	0.00	0.00	0.00	89.13	93.33	10.87	6.67	0.00	0.00	92.74	5.03					
2007 Indianapolis - Carmel MSA -	8	20.51	0.20	0.00	3.22	0.00	81.81	75.00	14.77	25.00	0.25	3.69	77.59	17.24					
2007 MI Grand Rapids - Wyoming	0	0.00	0.00	0.00	0.87	0.00	73.69	0.00	25.44	0.00	0.64	3.85	65.38	30.13					
2007 MI Kalamazoo - Portage MSA	0	0.00	0.00	0.00	10.18	0.00	47.79	0.00	42.04	0.00	5.56	11.11	47.22	36.11					
2007 MI Lansing - E. Lansing MSA	0	0.00	0.22	0.00	1.11	0.00	87.63	0.00	10.81	0.00	0.70	4.23	78.87	15.49					
2007 MI Non MSA	2	5.13	0.00	0.00	0.00	0.00	59.57	0.00	40.43	100.00	0.00	0.00	65.28	34.72					
2007 NV Carson City MSA - 16180	0	0.00	0.00	0.00	20.00	0.00	70.00	0.00	10.00	0.00	0.00	0.00	100.00	0.00					
2007 NV Las Vegas - Paradise	0	0.00	2.81	0.00	10.67	0.00	43.26	0.00	43.26	0.00	0.50	12.00	34.50	50.00					
2007 UT Salt Lake City MSA -	0	0.00	3.11	0.00	10.88	0.00	41.97	0.00	44.04	0.00	5.34	15.27	35.11	39.69					
Limited-Review:																			

(*) Based on 2007 Aggregate Small Farm Data only.

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

(***) Source of DATA - DUN & BRADSTREET 2007.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE														State: ALL		Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007			
MA/Assessment Area	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data (%) **								
	#	% of Total*	% of Families***	% BANK Loans*	% of Families***	% BANK Loans*	% of Families***	% BANK Loans*	% of Families***	% BANK Loans*	Low	Mod	Mid	Upp					
Full-Review:																			
2007 IN Bloomington MSA -	18	5.13	17.33	5.56	16.85	11.11	21.08	27.78	44.74	55.56	6.12	15.64	21.87	40.70					
2007 IN Columbus MSA - 18020	217	61.82	17.58	12.90	19.75	17.97	24.21	29.95	38.46	38.25	10.51	20.59	22.34	33.79					
2007 IN Non MSA	31	8.83	15.55	16.13	20.59	12.90	28.11	25.81	35.75	41.94	9.29	23.20	23.63	24.74					
2007 Indianapolis - Carmel MSA -	71	20.23	18.90	11.27	18.33	22.54	22.98	14.08	39.80	39.44	8.90	22.78	20.83	33.33					
2007 MI Grand Rapids - Wyoming	4	1.14	16.37	50.00	17.95	0.00	24.90	25.00	40.78	25.00	8.91	23.65	21.80	28.94					
2007 MI Kalamazoo - Portage	1	0.28	17.71	0.00	17.54	0.00	23.16	0.00	41.59	100.00	8.28	19.95	21.69	31.92					
2007 MI Lansing - E. Lansing	1	0.28	18.73	0.00	18.49	0.00	23.54	0.00	39.23	100.00	10.45	23.93	20.43	25.69					
2007 MI Non MSA	3	0.85	12.86	0.00	17.41	33.33	24.92	0.00	44.81	66.67	2.59	12.57	19.95	50.67					
2007 NV Carson City MSA -	0	0.00	18.57	0.00	18.77	0.00	22.30	0.00	40.37	0.00	2.48	14.48	28.08	41.96					
2007 NV Las Vegas - Paradise	5	1.42	18.70	0.00	18.75	20.00	23.47	0.00	39.08	80.00	1.04	7.40	20.74	52.88					
2007 UT Salt Lake City MSA -	0	0.00	16.72	0.00	19.64	0.00	24.82	0.00	38.82	0.00	2.90	17.30	25.38	42.58					
Limited-Review:																			

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

(**) Based on 2007 Aggregate HMDA Data only.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT														State: ALL		Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007			
MA/Assessment Area	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data (%) **								
	#	% of Total*	% of Families***	% BANK Loans*	% of Families***	% BANK Loans*	% of Families***	% BANK Loans*	% of Families***	% BANK Loans*	Low	Mod	Mid	Upp					
Full-Review:																			
2007 IN Bloomington MSA -	4	6.15	17.33	0.00	16.85	50.00	21.08	0.00	44.74	50.00	5.46	15.70	25.26	52.56					
2007 IN Columbus MSA - 18020	32	49.23	17.58	9.38	19.75	3.13	24.21	21.88	38.46	53.13	7.78	15.87	26.95	45.81					
2007 IN Non MSA	11	16.92	15.55	0.00	20.59	9.09	28.11	27.27	35.75	54.55	6.93	22.67	30.67	38.13					
2007 Indianapolis - Carmel MSA -	14	21.54	18.90	7.14	18.33	14.29	22.98	42.86	39.80	28.57	10.57	22.70	22.38	41.85					
2007 MI Grand Rapids - Wyoming	0	0.00	16.37	0.00	17.95	0.00	24.90	0.00	40.78	0.00	8.45	21.38	27.70	40.73					
2007 MI Kalamazoo - Portage	1	1.54	17.71	0.00	17.54	0.00	23.16	100.00	41.59	0.00	9.64	22.49	25.44	39.36					
2007 MI Lansing - E. Lansing MSA	0	0.00	18.73	0.00	18.49	0.00	23.54	0.00	39.23	0.00	10.86	26.89	26.36	33.55					
2007 MI Non MSA	0	0.00	12.86	0.00	17.41	0.00	24.92	0.00	44.81	0.00	4.73	15.46	27.44	48.58					
2007 NV Carson City MSA - 16180	0	0.00	18.57	0.00	18.77	0.00	22.30	0.00	40.37	0.00	5.85	15.20	22.81	50.88					
2007 NV Las Vegas - Paradise	3	4.62	18.70	0.00	18.75	0.00	23.47	0.00	39.08	100.00	3.80	12.62	24.18	56.09					
2007 UT Salt Lake City MSA -	0	0.00	16.72	0.00	19.64	0.00	24.82	0.00	38.82	0.00	4.90	16.49	29.91	46.14					
Limited-Review:																			

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

(**) Based on 2007 Aggregate HMDA Data only.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE														State: ALL		Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007			
MA/Assessment Area	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data (%) **								
	#	% of Total*	% of Families***	% BANK Loans*	% of Families***	% BANK Loans*	% of Families***	% BANK Loans*	% of Families***	% BANK Loans***	Low	Mod	Mid	Upp					
Full-Review:																			
2007 IN Bloomington MSA - 14020	13	5.24	17.33	0.00	16.85	7.69	21.08	0.00	44.74	76.92	5.05	16.97	22.39	41.24					
2007 IN Columbus MSA - 18020	92	37.10	17.58	7.61	19.75	27.17	24.21	23.91	38.46	38.04	9.70	20.68	24.54	34.17					
2007 IN Non MSA	36	14.52	15.55	8.33	20.59	22.22	28.11	25.00	35.75	41.67	5.94	21.15	29.25	34.08					
2007 Indianapolis - Carmel MSA -	76	30.65	18.90	14.47	18.33	19.74	22.98	30.26	39.80	27.63	7.37	18.88	22.97	36.43					
2007 MI Grand Rapids - Wyoming	6	2.42	16.37	0.00	17.95	16.67	24.90	16.67	40.78	66.67	6.58	19.95	23.32	32.05					
2007 MI Kalamazoo - Portage MSA	10	4.03	17.71	0.00	17.54	10.00	23.16	10.00	41.59	80.00	7.15	17.47	22.48	35.95					
2007 MI Lansing - E. Lansing MSA	4	1.61	18.73	0.00	18.49	0.00	23.54	0.00	39.23	75.00	7.69	21.01	24.82	28.88					
2007 MI Non MSA	5	2.02	12.86	0.00	17.41	20.00	24.92	0.00	44.81	80.00	2.88	11.10	19.77	49.35					
2007 NV Carson City MSA - 16180	1	0.40	18.57	0.00	18.77	0.00	22.30	0.00	40.37	100.00	2.90	14.48	23.02	47.64					
2007 NV Las Vegas - Paradise	5	2.02	18.70	20.00	18.75	20.00	23.47	0.00	39.08	60.00	2.47	11.29	22.60	48.99					
2007 UT Salt Lake City MSA -	0	0.00	16.72	0.00	19.64	0.00	24.82	0.00	38.82	0.00	3.39	16.01	27.00	42.25					
Limited-Review:																			

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

(**) Based on 2007 Aggregate HMDA Data only.

(***) Percentage of Families is based on 2000 Census Information.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			State: ALL		Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007				
MA/Assessment Area	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Data***	
	#	% 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:									
2007 IN Bloomington MSA - 14020	115	9.11	88.92	55.65	41	41	33	4,065	1,257
2007 IN Columbus MSA - 18020	173	13.71	86.60	45.66	68	54	51	2,080	763
2007 IN Non MSA	118	9.35	90.42	59.32	62	42	14	3,119	1,381
2007 Indianapolis - Carmel MSA -	372	29.48	86.76	59.68	146	94	132	56,077	18,484
2007 MI Grand Rapids - Wyoming	89	7.05	86.80	51.69	37	25	27	27,962	10,660
2007 MI Kalamazoo - Portage MSA	96	7.61	88.39	67.71	44	34	18	7,710	3,011
2007 MI Lansing - E. Lansing MSA	107	8.48	89.71	71.03	53	28	26	13,893	5,566
2007 MI Non MSA	62	4.91	90.08	82.26	32	15	15	7,452	3,189
2007 NV Carson City MSA - 16180	25	1.98	88.84	64.00	11	6	8	4,531	2,044
2007 NV Las Vegas - Paradise MSA	66	5.23	88.11	36.36	23	15	28	99,031	44,159
2007 UT Salt Lake City MSA -	39	3.09	87.28	53.85	11	11	17	57,120	20,288
Limited-Review:									

(*) Businesses with revenues of \$1 million or less as a percentage of all businesses. DATA - DUN & BRADSTREET 2007.

(**) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

(***) Based on 2007 Aggregate Small Business Data only.

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

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			State: ALL		Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007				
MA/Assessment Area	Total Small Farms Loans		Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Data***	
	#	% of Total****	% of Farm*	% BANK Loans**	\$100,000 or Less	>\$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less
Full-Review:									
2007 IN Bloomington MSA - 14020	0	0.00	95.45	0.00	0	0	0	18	13
2007 IN Columbus MSA - 18020	14	35.90	99.52	100.00	8	5	1	69	61
2007 IN Non MSA	15	38.46	98.68	100.00	9	3	3	179	149
2007 Indianapolis - Carmel MSA -	8	20.51	99.02	100.00	3	4	1	406	311
2007 MI Grand Rapids - Wyoming	0	0.00	94.43	0.00	0	0	0	156	104
2007 MI Kalamazoo - Portage MSA	0	0.00	92.04	0.00	0	0	0	36	19
2007 MI Lansing - E. Lansing MSA	0	0.00	98.55	0.00	0	0	0	142	104
2007 MI Non MSA	2	5.13	97.57	100.00	2	0	0	72	54
2007 NV Carson City MSA - 16180	0	0.00	100.00	0.00	0	0	0	5	3
2007 NV Las Vegas - Paradise	0	0.00	93.82	0.00	0	0	0	200	164
2007 UT Salt Lake City MSA -	0	0.00	92.75	0.00	0	0	0	131	107
Limited-Review:									

(*) Farms with revenues of \$1 million or less as a percentage of all farms. DATA - DUN & BRADSTREET 2007

(**) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

(***) Based on 2007 Aggregate Small Farm Data only.

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

Table 13. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)

Geographic and Borrower Distribution: CONSUMER LOANS																			State: ALL		Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007					
MA/Assessment Area	Total Consumer Loans		Geographic Distribution								Borrower Distribution															
			Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers									
	#	% of Total**	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans								
Full-Review:																										
2007 IN Bloomington MSA -	0	0.00	9.85	0.00	14.44	0.00	46.35	0.00	29.35	0.00	26.01	0.00	15.35	0.00	16.58	0.00	42.06	0.00								
2007 IN Columbus MSA - 18020	0	0.00	0.00	0.00	18.30	0.00	65.86	0.00	15.84	0.00	21.42	0.00	17.79	0.00	20.52	0.00	40.28	0.00								
2007 IN Non MSA	0	0.00	0.00	0.00	0.00	0.00	93.53	0.00	6.47	0.00	19.20	0.00	17.59	0.00	23.74	0.00	39.48	0.00								
2007 Indianapolis - Carmel MSA -	0	0.00	4.78	0.00	23.67	0.00	47.92	0.00	23.62	0.00	21.74	0.00	17.39	0.00	19.71	0.00	41.16	0.00								
2007 MI Grand Rapids - Wyoming	0	0.00	1.88	0.00	16.64	0.00	59.59	0.00	21.89	0.00	20.21	0.00	16.95	0.00	21.38	0.00	41.46	0.00								
2007 MI Kalamazoo - Portage	0	0.00	5.09	0.00	17.48	0.00	49.49	0.00	27.94	0.00	23.02	0.00	15.87	0.00	19.39	0.00	41.72	0.00								
2007 MI Lansing - E. Lansing	0	0.00	5.05	0.00	17.09	0.00	56.67	0.00	21.15	0.00	22.66	0.00	16.76	0.00	19.47	0.00	41.11	0.00								
2007 MI Non MSA	0	0.00	0.00	0.00	0.00	0.00	64.07	0.00	35.93	0.00	15.72	0.00	15.56	0.00	21.75	0.00	46.98	0.00								
2007 NV Carson City MSA -	0	0.00	0.00	0.00	10.19	0.00	69.73	0.00	20.08	0.00	21.41	0.00	16.68	0.00	21.58	0.00	40.33	0.00								
2007 NV Las Vegas - Paradise	0	0.00	1.80	0.00	27.81	0.00	42.28	0.00	28.12	0.00	20.96	0.00	17.65	0.00	20.82	0.00	40.57	0.00								
2007 UT Salt Lake City MSA -	0	0.00	0.77	0.00	27.00	0.00	48.29	0.00	23.93	0.00	20.12	0.00	18.15	0.00	22.48	0.00	39.25	0.00								
Limited-Review:																										

(*) Percentage of Households is based on the 2000 Census information.

(**) Consumer loans originated and purchased in the MSA/AA as a percentage of all consumer loans originated and purchased in the rated area.

