

PUBLIC DISCLOSURE

October 20, 1997

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bank:

*The Fifth Third Bank of Central Indiana
#071831800000
251 North Illinois Street, Suite 165
Indianapolis, Indiana 46204*

Supervisory Agency:

*Federal Reserve Bank of Cleveland
P.O. Box 6387
Cleveland, Ohio 44101-1387*

NOTE: 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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I. GENERAL INFORMATION

The Community Reinvestment Act ("CRA") requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the Community Reinvestment Act ("CRA") performance of The Fifth Third Bank of Central Indiana prepared by the Federal Reserve Bank of Cleveland, the institution's supervisory agency, as of October 20, 1997. The agency evaluates performance in assessment area(s) as they are delineated by the institution rather than individual branches. This assessment area evaluation may include visits to some, but not necessarily all, of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A of 12 CFR Part 228.

II. DESCRIPTION OF INSTITUTION

The Fifth Third Bank of Central Indiana ("FTBCI"), Indianapolis, Indiana, is a subsidiary of Fifth Third Bancorp, Cincinnati, Ohio. Other subsidiaries of Fifth Third Bancorp include banks in Ohio, Indiana, Kentucky, and Florida; Fifth Third Community Development Corporation; Fifth Third Investment Company; Fountain Square Insurance Company; and Money Station, an ATM network. Fifth Third Bancorp had total assets of \$20.7 billion as of June 30, 1997. Fifth Third Bank of Central Indiana had total assets of \$1.2 billion as of June 30, 1997, which comprised more than five percent of the Bancorp's total assets.

FTBCI is a full-service financial institution with a primary business focus on real estate, commercial, and consumer lending. Table 1 presents several key financial ratios for FTBCI.

<i>Table 1 Key Financial Ratios as of June 30, 1997</i>	
<i>Return on Average Assets</i>	1.44%
<i>Net Loans & Leases to Average Assets</i>	66.16%
<i>Investments to Average Assets</i>	26.89%
<i>Total Deposits to Average Assets</i>	55.15%
<i>Net Loans & Leases to Total Deposits</i>	121.77%
<i>1-4 Family Residential Loans to Average Loans*</i>	26.08%
<i>Consumer Loans** to Average Loans</i>	21.17%
<i>Commercial Loans*** to Average Loans</i>	32.69%
<i>Agricultural Loans to Average Loans</i>	1.30%
<i>Lease Financing Receivables to Average Loans</i>	23.40%

* Includes home equity loans.
 ** Includes loans to individuals and credit card loans.
 *** Includes commercial & industrial loans, commercial real estate loans, and construction & development loans.

FTBCI's asset size and financial condition indicate that it has the ability to meet the credit needs of its assessment areas. There are no legal or other impediments which would hamper FTBCI's ability to meet the community's credit needs.

III. DESCRIPTION OF ASSESSMENT AREA

FTBCI has defined one assessment area which consists of Boone, Hamilton, Madison, Hendricks, Marion, Hancock, Morgan, Johnson, Shelby, Rush, Fayette, Decatur, Ripley, Dearborn, and Ohio counties in Central Indiana. The assessment area includes the entire Indianapolis Metropolitan Statistical Area (MSA 3480) and a small portion of the Cincinnati Metropolitan Statistical Area (MSA 1640) which crosses the Indiana state line into Ohio and Dearborn counties in southeastern Indiana. There are a total of 364 census tracts/block numbering areas (BNAs) in the bank's assessment area. The assessment area complies with the

requirements of the Community Reinvestment Act and does not arbitrarily exclude low- or moderate-income census tracts.

Tables 2 and 3 present relevant demographic information for the assessment area. The median family income for the assessment area is \$36,712 compared with \$36,658 for MSA 1640, and \$37,198 for MSA 3480, respectively.

<i>Type of Geography*</i>	<i># and % of Geographies</i>	<i># and % of Population</i>	<i># and % of Families</i>	<i># and % of O-O** Units</i>
<i>Low-I ncome</i>	28 8%	76,762 5%	17,093 4%	11,387 3%
<i>Moderate-I ncome</i>	78 21%	294,107 19%	74,844 18%	60,556 16%
<i>Middle-I ncome</i>	180 50%	749,660 50%	205,565 51%	193,734 51%
<i>Upper-I ncome</i>	78 21%	396,517 26%	112,011 27%	113,910 30%
<i>Total</i>	364	1,517,046	409,513	379,587

* Geographies are classified as follows: low-income geographies have median family incomes less than 50% of the area median family income, moderate-income geographies have median family income from 50% to less than 80% of the area median family income, middle-income geographies have median family income from 80% to less than 120% of the area median family income, and upper-income geographies have median family income equal to or greater than 120% of the area median family income.

** Owner-occupied units.

<i>Family Income Level*</i>	<i>Number of Families</i>	<i>% of Families</i>
<i>Low-I ncome</i>	75,991	18.6%
<i>Moderate-I ncome</i>	76,593	18.7%
<i>Middle-I ncome</i>	98,988	24.2%
<i>Upper-I ncome</i>	157,941	38.6%
<i>Below Poverty Level**</i>	30,606	8.6%

* Family income levels are classified as follows: low-income families have median family incomes less than 50% of the area median family income, moderate-income families have median family income from 50% to less than 80% of the area median family income, middle-income families have median family income from 80% to less than 120% of the area median family income, and upper-income families have median family income equal to or greater than 120% of the

area median family income.

** Subset of low-income families.

There are 624,163 housing units in the assessment area, with 60.8% owner-occupied, 32.0% rental units, and 7.2% vacant. One-to-four family units comprise 77.2% of the housing stock, while multi-family units of five or more comprise 17.8% and mobile homes comprise 4.1% of the remaining housing stock, respectively. The assessment area median housing value is \$62,000, median gross rent is \$403 per month, and 29.1% of the housing stock was built prior to 1950. By comparison, the owner occupancy rates for MSA 3480 and 1640 are similar (60.0% and 59.8%, respectively) while the median housing value (\$69,849) and percent of housing built prior to 1950 (34.6%) for MSA 3480 are slightly higher than MSA 1640 and the bank's overall assessment area.

Service, retail trade, and manufacturing are the dominant industry employers. Eli Lilly and Company (pharmaceuticals 7,500 employees), Marsh Supermarkets Inc./Village Pantry Markets (grocers/retail 7,000), Allison Transmission and Allison Engine Company (manufacturing 8,200 combined), and Anthem, Inc. (insurance/health carrier 3,000), are major employers in their respective industries. The local economies are strong and are experiencing business development and expansion and growth in employment. The unemployment rates in the counties that comprise the assessment area range from 1.3% to 5.0%, with an average unemployment rate of 2.7%. This rate is lower than the unemployment rate for the State of Indiana of 3.3%.

Table 4 details recent unemployment rates by county as compared with the state and national averages.

<i>Table 4 Unemployment Rates as of August 1997*</i>	
<i>State of Indiana</i>	<i>3.3%</i>
<i>Boone County</i>	<i>1.8%</i>
<i>Dearborn County</i>	<i>3.6%</i>
<i>Decatur County</i>	<i>2.3%</i>
<i>Fayette County</i>	<i>5.0%</i>
<i>Hamilton County</i>	<i>1.3%</i>
<i>Hancock County</i>	<i>2.2%</i>
<i>Hendricks County</i>	<i>1.7%</i>
<i>Johnson County</i>	<i>2.0%</i>
<i>Madison County</i>	<i>3.6%</i>
<i>Marion County</i>	<i>3.0%</i>
<i>Morgan County</i>	<i>2.6%</i>

<i>Ohio County</i>	<i>2.8%</i>
<i>Ripley County</i>	<i>2.8%</i>
<i>Rush County</i>	<i>2.5%</i>
<i>Shelby County</i>	<i>3.0%</i>
<i>United States (National)</i>	<i>4.8%</i>

**Based upon Indiana Department of Workforce Development information.*

Community contacts were conducted in conjunction with the examination. The community contacts included meetings with community and economic development organizations. The primary needs identified as a result of these contacts included small business training, commercial loans for new development, and lending for housing and rehabilitation.

IV. INSTITUTION RATING

This institution's CRA performance is rated satisfactory.

The major factors and criteria contributing to this rating include:

- ! Excellent responsiveness to assessment area credit needs*
- ! A high percentage of loans inside the assessment area*
- ! Penetration of assessment area geographies*
- ! Reasonable distribution of loans throughout the assessment area*
- ! Penetration of loans among retail customers of different income levels and business customers of different sizes*
- ! Leadership role in providing community development loans*
- ! Leadership role in providing innovative and flexible lending practices*
- ! Delivery systems accessible to essentially all of the assessment area*
- ! Active role in providing qualified community development investments*
- ! Leadership role in providing credit and community economic development needs*

Table 5 indicates the performance level of FTBCI with respect to the lending, investment, and service test.

<i>Table 5 FTBCI PERFORMANCE TESTS</i>			
<i>PERFORMANCE LEVELS</i>	<i>LENDING TEST*</i>	<i>INVESTMENT TEST</i>	<i>SERVICE TEST</i>
<i>Outstanding</i>			

<i>High Satisfactory</i>	X	X	X
<i>Low Satisfactory</i>			
<i>Needs to Improve</i>			
<i>Substantial Noncompliance</i>			

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

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Lending Test

Lending Activity

The bank's 1997 consumer lending, 1996 and 1997 real estate lending, and 1996 small business and farm lending within the assessment area were reviewed. Based upon the bank's new loan origination reports, through June 30, 1997, FTBCI originated 1,724 consumer loans totaling approximately \$29,968,367 in 1997. Approximately 91% of the bank's 1997 consumer lending (1,569 loans) was within the assessment area. The majority of the lending activity is related to motor vehicles, home equity, consumer, home purchase and refinance, small business, and small farm and reflects a high level of responsiveness to the assessment area's credit needs.

Table 6 shows the number and dollar amount of the bank's 1996 new real estate, small business, and farm lending inside its assessment area.

<i>Loan Type</i>	<i>Number of Loans</i>	<i>% of Total Loans</i>	<i>Amount of Loans *</i>	<i>% of Total Loans</i>
<i>Real Estate Purchase</i>	361	99.2%	\$51,929	99.4%
<i>Home Refinance</i>	137	96.6%	\$14,580	99.1%
<i>Home Improvement</i>	225	73.3%	\$2,327	86.1%
<i>Small Business</i>	956	87.7%	\$120,050	83.7%
<i>Small Business - Real Estate</i>	60	90.9%	\$5,086	89.5%
<i>Farm</i>	283	82.7%	\$8,750	74.3%
<i>Total</i>	2,022	87.6%	\$202,722	71.7%

* In thousands.

Review of the bank's 1996 lending revealed that a substantial majority of the bank's loans were extended within the assessment area. Additionally, review of the bank's 1997 year-to-date HMDA data revealed an increase in overall loan volume (1,246 total originations) and continued strong performance within the assessment area, with 1,025 loans (82.3%) originated within the assessment area.

Geographic Distribution

FTBCI 1996 and 1997 real estate, small business, and farm originations were reviewed to assess the bank's lending performance with respect to geographic distribution. Table 7 depicts the number and amount of the bank's mortgage lending in each category of geography as a percentage of the number and amount of total mortgage lending. Home purchase, refinance, and home improvement loans are compared to the percentage of owner-occupied units in each geography, while multi-family loans are compared to the percentage of multi-family units in each geography.

<i>Table 7 Distribution of 1996 Mortgage Loans by Geography</i>				
<i>Type of Loan</i>	<i>Low-I ncome</i>	<i>Moderate-I ncome</i>	<i>Middle-I ncome</i>	<i>Upper-I ncome</i>
<i>Home Purchase Loans *</i>	0.8% 0.2%	4.2% 1.5 %	28.3% 20.4%	66.7% 77.9%
<i>Home Refinance Loans *</i>	1.5% 1.0%	7.3% 2.3%	35.7% 22.5%	55.5% 74.2%
<i>Home I mprovement Loans *</i>	1.8% 0.7%	11.1% 9.6%	51.1% 46.6%	36.0% 43.1%
<i>Owner-Occupied Units **</i>	3.0%	16.1%	51.4%	29.5%
<i>Multi-Family Loans *</i>	0% 0%	0% 0%	0% 0%	0% 0%
<i>Multi-Family Units **</i>	7.5%	23.1%	48.8%	20.6%

* Number and dollar amount of mortgage loans as a percentage of: 361 purchase loans totaling \$51,929; 137 refinance loans totaling \$14,580; 225 home improvement loans totaling \$2,327 total mortgage loans

** Percentage of total units.

The bank's assessment area contains 15 counties, with the majority of low- or moderate-income geographies located within MSA 3480 Marion County (83 of 106 total low- or moderate-income geographies). One moderate-income geography is located in Dearborn County (MSA 1640) and in Ohio County (MSA 1640). Census tracts in MSA 1640 comprise only two percent of the bank's assessment area. Review of the bank's lending data revealed that the bank generated 2.8% of its overall originations (40 real estate mortgages, 14 small business loans, and 10 farm loans) in MSA 1640.

Review of the bank's 1996 real estate lending revealed fairly low penetration in low- and moderate-income geographies, where the bank originated a total of 59 loans (8%). The bank's penetration in Marion County low- and moderate-income geographies reflects its smaller

size and limited number of offices relative to larger competing institutions located in downtown Indianapolis. Discussions with management regarding the lack of multifamily loans reported indicated that the bank relies upon its loans and lines of credit to third parties to meet assessment area credit needs. The bank's 1997 year-to-date real estate lending is depicted in table 7A below:

<i>Type of Geography</i>	<i>Number</i>	<i>Percent</i>	<i>Dollar Amount (000's)</i>	<i>Percent</i>
<i>Low Income</i>	8	0.8%	812	0.9%
<i>Moderate Income</i>	46	4.5%	1,264	1.5%
<i>Middle Income</i>	454	29.6%	23,592	27.6%
<i>Upper Income</i>	517	66.9%	59,901	70.0%

Table 8 depicts percentages of the number and dollar amount of the bank's loans to business and farms with less than \$1 million in annual revenue in each category of geography as a percentage of the number and dollar amount of total small business and small farm lending.

<i>Type of Loan</i>	<i>Low-Income</i>	<i>Moderate-Income</i>	<i>Middle-Income</i>	<i>Upper-Income</i>
<i>Small Business, Real Estate*</i>	3.3%	5.0%	38.3%	53.3%
	3.3%	2.8%	26.4%	64.4%
<i>Small Business, Other*</i>	3.5%	11.3%	52.5%	32.7%
	5.7%	12.2%	47.3%	34.8%
<i>Farm*</i>	0%	0%	87.6%	12.4%
	0%	0%	89.0%	11.0%

*Number and dollar percentages based upon 956 small business loans totaling \$120,050, 60 small business-other loans totaling \$5,086, and 283 farm originations totaling \$8,750

Table 8 reveals a reasonable distribution of small business loans among low- and moderate-income geographies. The bank's limited farm lending in low- or moderate-income census tracts reflects the limited number of low- or moderate-income geographies (one) in the rural portions of the assessment area. If farm loans are excluded from the total, approximately 14% of the bank's small business originations were generated in low- or moderate-income geographies.

Borrower Distribution

Table 10 by percentage, depicts the number and amount of the bank's 1996 and 1997 mortgage lending in each category of borrower

income as a percentage of the number and amount of total mortgage lending. Lending percentages are compared to the percentage of population in each income category.

<i>Table 10</i> <i>Distribution of 1996 Mortgage Loans by Borrower Income</i>				
<i>Type of Loan</i>	<i>Income</i>			
	<i>Low</i>	<i>Moderate</i>	<i>Middle</i>	<i>Upper</i>
<i>Home Purchase Loans *</i>	5.0%	11.1%	23.0%	56.2%
	1.4%	5.5%	17.3%	69.5%
<i>Home Refinance Loans *</i>	2.9%	11.7%	25.5%	55.5%
	0.9%	5.3%	16.6%	72.2%
<i>Home Improvement Loans *</i>	7.1%	17.8%	33.3%	40.4%
	3.7%	13.6%	26.3%	55.4%
<i>Family Income- **</i>	18.6%	18.7%	24.2%	38.6%

* Number and amount percentages based upon the following totals: 361 home purchase loans for \$51,929; 137 home refinance loans totaling \$14,580; 225 home improvement loans totaling \$2,327.

** Percentage of total population based upon 1990 census median family income for the assessment area.

Table 10A illustrates the number and dollar amount of 1997 real estate lending by borrower income level:

<i>Table 10A</i> <i>Distribution of 1997 Mortgage Loans by Borrower Income</i>				
<i>Borrower Income Level</i>	<i>Number</i>	<i>Percent</i>	<i>Dollar Amount (000's)</i>	<i>Percent</i>
<i>Low</i>	24	2.3%	275	0.3%
<i>Moderate</i>	104	10.1%	3,698	4.3%
<i>Middle</i>	208	20.3%	9,808	11.5%
<i>Upper</i>	663	64.7%	68,921	80.5%

As depicted in Tables 10 and 10A, the bank's mortgage lending to low- and moderate-income borrowers compares reasonably with census demographics. The bank generated approximately 19% (134 of 723 total originations) of its originations to low- and moderate-income

individuals in 1996. Review of the bank's 1997 HMDA Loan Application Register ("LAR") through June 30, 1996, revealed that approximately 13% of the bank's year-to-date originations were to low- or moderate-income applications. FTBCI's overall distribution of borrowers reflects reasonable penetration among retail customers of different income levels, with consideration given to the bank's size and to competition within Marion County.

Table 11 shows the number and amount of small business and small farm loans to businesses with less than \$1 million in annual revenues and the respective percentages of total small business and small farm loans.

Table 11 Small Business and Farm Loans With Revenues Less Than \$1 Million				
<i>Type of Loan</i>	<i>Number of Loans</i>	<i>% of Total Loans</i>	<i>Amount of Loans*</i>	<i>% of Total Amount</i>
<i>Small Business</i>	655	68.5%	\$55,832	46.5%
<i>Small Bus. - RE</i>	44	73.3%	\$5,086	59.3%
<i>Farm</i>	279	98.6%	\$8,750	92.7%

*In thousands.

Table 11 illustrates that the majority of FTBCI small business and farm loans are to businesses and farms with less than \$1 million in annual revenues. FTBCI's distribution of borrowers reflects excellent penetration among business and farm customers of different revenue sizes.

Table 12 depicts the number and amount of small business and small farm loans by loan amount as a percentage of total small business and small farm loans.

Table 12 Small Business and Farm Loans by Origination Amount						
<i>Type of Loan</i>	<i>Loan Amount < = \$100,000 Number/Percent</i>		<i>Loan Amount > \$100,000 < = \$250,000 Number/Percent</i>		<i>Loan Amount > \$250,000 Number/Percent</i>	
<i>Business</i>	525	80.2%	73	11.1%	57	8.7%
<i>Business RE</i>	37	84.1%	6	13.6%	1	2.3%
<i>Farm</i>	262	93.9%	16	5.7%	1	0.4%

Review of small business and farm originations revealed that a substantial majority of the bank's originations were for amounts of \$100,000 or less.

Community Development Loans

Since the previous examination, FTBCI has originated \$7,758,523 in community development loans. These extensions of credit show a responsiveness to the lending needs of the low- and moderate-income communities located in the bank's assessment area. Loan purposes range from providing affordable housing to low- and moderate-income areas to economic revitalization projects that benefit the development of these communities. A complete list of the eight community development loans is detailed below:

- ! Increased and additional financing to Pleasant Run Childrens Home, a not-for-profit health/rehabilitation/welfare agency devoted to treatment of youth who generally have a combination of physical, social, emotional, and academic problems. Their main office and treatment facilities are located in LMI communities.
- ! New financing to Chef For Hire, Inc., a local caterer. The new funds will be used to relocate the business to a CDC. The project involves the rehabilitation of a formerly abandoned industrial building located in an LMI community. The relocation and rehab will result in job opportunities and training for LMI residents as well as stabilize the project and the surrounding neighborhood.
- ! Increased financing to the Fort Harrison Reuse Authority, a quasi-government agency that undertakes the planning, rehabilitation, development, and other preparations for all property within Fort Harrison, an LMI redevelopment area.
- ! Increased financing to Martin Luther King Community Development Center. The organization's main function is to fund housing and community development projects in LMI communities.
- ! Funding to Fayette Vocational Builders, Inc., to build affordable housing and to provide training to vocational school students.
- ! New financing to L. J. Underwriting Associates, Inc., to purchase a 42-unit apartment building to house low-income individuals in an LMI community.
- ! Renew financing to the Archdiocese of Indianapolis, a nonprofit catholic church that administers and, in part, funds Catholic Social Services, a provider of a multitude of social services to LMI individuals and families.
- ! New financing to Fort Harrison Associates, L.L.C. to construct a medical practice facility in the Ft. Harrison Reuse Authority area, an LMI redevelopment area.

Innovative/Flexible Lending Criteria

FTBCI uses innovative and flexible lending criteria to improve its ability to meet the credit needs within its assessment area. The following is a listing of these innovative and/or flexible lending programs, several of which demonstrate the bank's initiative in creating loan products that meet the special needs of some of its residents:

- ! The Good Neighbor Mortgage Loan Program provides flexible, affordable home purchase loans for low- and moderate-income residents. The program features four options based upon property location, household income, and source of down payment. Program specifics vary, but they typically include more liberal debt-to-income ratios, lower down payment requirements, and reduced closing costs. Since the previous evaluation, 29 loans were originated for more than \$1.5 million.
- ! FHA and VA loans are government-guaranteed mortgage loans offering no or low down payment to qualified buyers. Since

the previous examination, the bank has originated 37 FHA loans totaling \$2,927,000 and 23 VA loans totaling \$2,083,000.

- ! The bank originates government-assisted business loans in conjunction with the Small Business Administration (SBA) 7A and 504 loan programs. As of June 30, 1997, the bank had 33 outstanding SBA loans totaling \$3,843,865.
- ! The Fresh Start Loan Program provides automobile loans for individuals who need special financing due to a less-than-satisfactory credit history or no credit history. There are currently a total of 24 loans for \$133,546 in the bank's portfolio.
- ! Good Neighborhood Secured Credit Cards are secured by a Fifth Third savings account for individuals trying to establish or re-establish credit history. The bank approved 1,250 applications in 1996 and has approved 813 year-to-date. There are currently 3,439 active accounts in the bank's portfolio.

Investment Test

FTBCI makes investments and grants primarily through the Fifth Third Foundation and the Fifth Third Community Development Corporation (CDC), a subsidiary of Fifth Third Bancorp. CDC makes investments through low-income housing tax credits and small business venture capital equity funds.

The Foundation Office is a department of the Fifth Third Investment Advisors, a division of Fifth Third Bank of Cincinnati. The Foundation Office manages the Cincinnati bank's charitable trust established from profits of the bank for the purpose of providing grants and contributions to community and neighborhood, health and human services, educational, and cultural organizations. The Foundation makes over \$2 million in contributions from this trust annually. In addition to the bank's charitable trust, the Foundation Office serves as sole trustee for several privately established trusts. In its fiduciary capacity, the bank has the opportunity to direct grants and contributions from these trusts to organizations that provide affordable housing and other community development services which benefit low- and moderate-income individuals and geographies. In 1997, the foundation donated \$40,000 locally, including a \$25,000 donation to a fund-raising campaign located in a low-income census tract.

Grants and contributions were made to organizations that provide money management education to young adults; home buyer education and counseling; youth mentoring services; community services; job skills and training; affordable housing; and small business development and incubator services.

Fifth Third Community Development Corporation ("CDC") is a subsidiary of Fifth Third Bancorp. The CDC makes investments through low-income housing tax credits and small business venture capital equity funds. The CDC has funded \$4 million in low-income housing tax credits as of January 31, 1997, of a total commitment of \$12.6 million. The CDC has funded \$4.5 million in small business venture capital equity funds as of January 31, 1997, of a total commitment of \$9.7 million. These equity funds are invested primarily in small businesses in other Bancorp regions, including businesses in northern Kentucky.

Locally, FTBCI has made \$45,635 in grants and donations to economic and community development organizations since the previous examination. The bank also has a \$50,000 investment in the Indiana Community Business Credit Corporation ("ICBCC") and a \$25,000 investment in LYNX Capital Corporation. The ICBCC funds small- and mid-size businesses that do not qualify for traditional bank financing. LYNX Capital Corporation is reputed to be the largest funding pool for minority-owned businesses in the State of Indiana, with approximately \$2,488,220 in loans outstanding to 28 minority-owned businesses.

The Indiana Statewide Certified Development Corporation ("ISCDC") is a private company that provides long-term, fixed rate financing in conjunction with a participating bank; the bank owns 838 shares in the ISCDC for a total of \$20,950. In October 1996, the bank received a \$460,000 Federal Home Loan Bank Affordable Housing Program subsidy for the Blue Triangle Residence Hall project. The project will renovate a deteriorating 73-year-old structure to create 92 single-room occupancy ("SRO") units (the FHLB subsidy was passed on to Partners in Housing Development, a not-for-profit housing development organization). Additionally, the bank has extended \$38,100 of a \$400,000 commitment to the Indianapolis Neighborhood Housing Partnership Single Family Mortgage Loan Pool (April 1997).

FTBCI has a high level of qualified community development investments and grants and has used innovative and complex investments to support community development initiatives.

Service Test

Retail Banking Services

FTBCI's retail banking and alternative delivery systems are accessible to essentially all geographies within the bank's assessment area. Table 14 shows the bank's distribution of branches and off-site ATMs by geography.

<p style="text-align: center;">Table 14 Distribution of Branches by Geography</p>						
Type of Geography	# of Branches	% of Branches	# of Off-Site ATMs	% of Off-Site ATMs	% of Total Population	% of Total Geographies
Low-Income	2	6%	2	3%	5%	7%
Moderate-Income	5	15%	7	12%	20%	22%
Middle-Income	12	36%	*50	*85%	49%	50%
Upper-Income	14	42%			26%	21%

*These figures are the totals for the ATMs located in both the middle- and upper-income census tracts.

Review of the bank's branch network revealed that 21% of the bank's branches are located in low- and moderate-income geographies which compares favorably to corresponding population of 25% and geographies of 29%. A analysis of the bank's office locations also revealed that additional branches located in middle- and upper-income geographies are conveniently located to low- and moderate-income geographies. The location of the branches provides adequate service accessibility to all geographies within the assessment area.

Table 14 also shows that 15% of the bank's off-site ATMs are located in low- and moderate-income geographies. Additionally, the bank operates one mobile ATM which has been made available at several local community events.

Stand-alone branches offer business hours Monday through Saturday, and the Bank Mart locations have extended hours Monday

through Saturday and are open on Sundays. One bank location is in a retirement home community for the convenience of its residents. In addition, the bank operates a 24-hour, seven-day-a-week Customer Service Call Center and Jeanie Telephone Banking Center which allows customers to open deposit accounts, apply for loans, make account inquiries, pay monthly bills (utilities, department stores, and credit cards), and perform various other banking transactions. Customers also have the opportunity to open deposit accounts and apply for loans through advertisements, direct mailings, and ~~Atake-one~~ brochure displays. Business hours and services are reasonable and do not vary in ways that may inconvenience low- or moderate-income geographies in the assessment area.

Table 15 shows FTBCI's record of opening and closing branches since the previous evaluation.

<i>Type of Geography</i>	<i># of Branches Closed</i>	<i># of Branches Opened</i>
<i>Low-I ncome</i>	0	0
<i>Moderate-I ncome</i>	0	1
<i>Middle-I ncome</i>	0	0
<i>Upper-I ncome</i>	0	2

As depicted in Table 15, since the previous examination, the bank opened one branch in a moderate-income census tract (7106 in MSA 3480) in Shelbyville. The bank's record of opening branches has not adversely affected the accessibility of its delivery systems.

Community Development Services

FTBCI provides community development services including educational programs for low- and moderate-income ("LMI") individuals and areas, technical assistance and educational services to small businesses, and home ownership counseling and seminars. The bank also participates in community organizations that concentrate on housing issues and land development and provides social services for low- and moderate-income individuals. The bank's officers and staff are involved in these community development organizations. The following is a partial list of FTBCI's activities in providing these services:

- ! Consumer Credit Counseling Services and the Dearborn County Housing Partnership were brought together with the aid of an officer of the bank. This partnership was formed to provide homeowner and credit counseling services for a start-up affordable housing initiative, LMI individuals in LMI area. The officer provides technical expertise in the development of this program as a director.
- ! Indianapolis Neighborhood Housing Partnership provides affordable housing services to LMI individuals residing in Indianapolis. As a member of the board of directors, a bank officer provides technical expertise for various mortgage-related activities of this organization, such as reviewing and approving requests for loans under the single- and multi-family loan pools that are available for LMI individuals and areas.

- ! *Partners in Housing Development develops special needs housing and provides services and training to the homeless and to those with disabilities and AIDS. Financial and banking expertise for program development is provided by an officer of the bank as a member of the board of directors.*
- ! *Community Centers of Indianapolis, Inc., is located in LMI areas and serves LMI individuals. CCI is the parent organization for community centers throughout the Indianapolis area which provides recreational and social services. A bank officer serves on an investment committee and provides advice on investment opportunities for the funding of the organization.*
- ! *Christamore House, one of the community centers under CCI, is located in an LMI area and provides recreational and social services for LMI individuals. A bank officer serves as a director, whereby banking and financial expertise is provided for the successful operation of the center.*
- ! *Police Athletic League of Indianapolis, which is located in and serves LMI individuals, seeks to establish permanent recreational and athletic facilities in LMI neighborhoods. A bank officer provides expertise for proposals to CDCs for the financing of these facilities. In addition, advice has been provided to assist in setting up a foundation to support this organization.*
- ! *Community Care Alliance is a group of social service providers targeted to assist children, many of whom are from LMI families. An officer of the bank serves on the board of directors as treasurer and gives financial advice to the organization.*
- ! *Neighborhood Self-Employment Initiative, in conjunction with CDCs and community groups, provides employment training to LMI individuals in LMI communities. Financial and banking advice is provided by an officer of the bank as a board member.*
- ! *Mayor's Committee on Brownfield Activities (City of Indianapolis) recommends the appropriate standards to clean and abate Brownfield sites, many of which are located in LMI areas. A bank officer serves on the committee and provides commercial real estate lending advice. Once cleaned up, these sites will provide additional land for development.*
- ! *City of Indianapolis, Division of Community Development and Financial Services, reviews proposals from city and community organizations to be funded through the Community Development Block Grant's Neighborhood Development Fund. An officer of the bank is on the committee that reviews these proposals, and makes recommendations prior to submission for the request of funds.*
- ! *Overcoming Obstacles, which is located in LMI areas and serves LMI individuals, is designed to link together non-profit organizations that have similar missions to enhance and expand programming. A bank officer provides CRA expertise as a member on the advisory board.*
- ! *Mid-City Pioneer Corporation reviews, approves, and monitors SBA loans recommended and subsequently approved by the Small Business Administration. A bank officer serves on the loan committee of this certified community development corporation.*

- ! *Fayette County Industrial Development Revolving Loan Fund lends to start-up and expanding manufacturers in the Connersville area, with the main focus on job creation and retention. Two of the bank's employees serve on the board of directors.*

Appendix A

SCOPE OF THE EXAMINATION

Time Period Reviewed: 6/11/96 TO 10/20/97

Financial Institution: The Fifth Third Bank of Central Indiana, Indianapolis, Indiana

Products Reviewed: Home Improvement

Home Purchase

Multi-Family

Home Refinance

Small Business

Small Farm

Small Business - Real Estate

Assessment Area: The Fifth Third Bank of Central Indiana has defined one assessment area which includes fifteen contiguous counties located within the State of Indiana. These counties are part of the Indianapolis, Indiana, Metropolitan Statistical Area 3480 and a small portion of the Cincinnati, Ohio, Primary statistical Area 1640. The entire assessment area was reviewed and evaluated on-site.