

PUBLIC DISCLOSURE

October 7, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Community Trust Bank, Inc.
346 North Mayo Trail
Pikeville, Kentucky 41501

RSSD #509811

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

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 the 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

PERFORMANCE TEST RATINGS

The following table indicates the performance level of Community Trust Bank, Inc. Pikeville, Kentucky (CTB) with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	COMMUNITY TRUST BANK, INC. PERFORMANCE TESTS		
	Lending Test *	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

SUMMARY OF MAJOR FACTORS SUPPORTING THE RATINGS

The major factors supporting the ratings include:

- A good responsiveness to credit needs;
- A high percentage of loans made in the bank’s assessment area;
- A good distribution of loans among borrowers of different income levels and businesses of different revenue sizes;
- A good geographic distribution of loans throughout the assessment area;
- A good record of serving the credit needs of low-income individuals and areas and very small businesses exhibited;
- Makes a relatively high level of community development loans;
- Makes use of flexible lending practices in serving the assessment area’s credit needs;
- Makes an excellent level of qualified community development investments and grants;
- Often in a leadership position in providing community development investments and grants;
- Retail delivery systems that are accessible to geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A leader in providing community development services.

DESCRIPTION OF INSTITUTION

Overview

CTB is a wholly-owned subsidiary of Community Trust Bancorp, Inc. (CTBI). Both companies are headquartered in Pikeville, Kentucky. As of June 30, 2019, CTB reported total assets of \$4.4 billion and total deposits of \$3.5 billion. CTB accounted for 99.5% of the holding company's consolidated assets. The Community Trust Community Development Corporation (CDC) is a subsidiary of CTB. The CDC primarily invests in small business investment companies, other qualifying business ventures, and affordable housing tax credit deals. The CDC is a primary contributor to CTB's investment test under Community Reinvestment Act (CRA). There are no other nonbank subsidiaries that provide mortgage lending or investment qualified CRA activities.

Business Lines

CTB provides traditional banking services to business and retail clients through the following lines of business:

- Personal Banking – includes checking, savings, debit cards, credit cards, real estate mortgage loans, home equity lines, and indirect and personal consumer loans;
- Business Banking – includes business checking, savings, certificates of deposit, credit cards, commercial real estate, revolving credit lines, and United State Department of Agriculture (USDA) and Small Business Administration (SBA) funding; and
- Wealth Management (under CTBI) – includes full-service brokerage and insurance services and wealth management services such as wealth planning, portfolio management, trust and estate, and retirement plan services.

Assessment Areas

Below are CTB's assessment areas that are evaluated as part of this CRA Performance Evaluation:

- Huntington-Ashland WV-KY-OH Metropolitan Statistical Area (MSA) #26580, consisting of Cabell, Lincoln, and Wayne counties in West Virginia and Boyd and Greenup counties in Kentucky (*excluding Putnam County, West Virginia and Lawrence County, Ohio*)
- Nonmetropolitan Kentucky, consisting of Adair, Bell, Boyle, Fleming, Floyd, Franklin, Green, Johnson, Knott, Laurel, Letcher, Madison, Marion, Mercer, Montgomery, Perry, Pike, Pulaski, Rockcastle, Russell, Taylor, and Whitley counties
- Lexington-Fayette KY MSA #30460 (Lexington-Fayette), consisting of Clark, Fayette, Scott, and Woodford counties (*excluding Bourbon and Jessamine counties*)
- Knoxville TN MSA #28940 (Knoxville), consisting of Anderson and Campbell counties (*excluding Blount, Grainger, Knox, Loudon, Morgan, Roane, and Union counties*)
- Nonmetropolitan West Virginia, consisting of Mingo and Nicholas counties

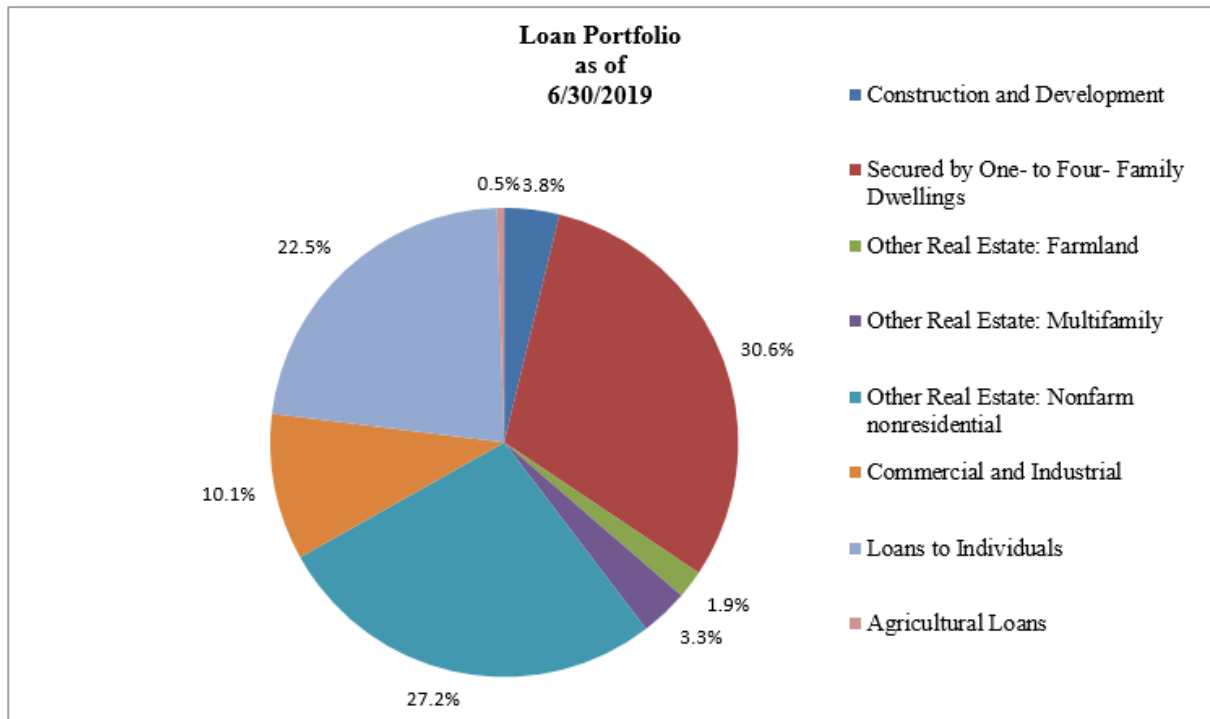
Financial Overview

CTB offers a wide variety of consumer, residential real estate, commercial, and agricultural loan products to fulfill the credit needs of the residents and businesses in its assessment areas. Consumer loan products include auto loans, personal lines of credit, installment loans, home equity loans, real estate mortgage loans, and credit cards. CTB also offers construction lending and commercial loan products, including loans and lines of credit, business credit cards, and USDA and SBA loans.

The following charts display CTB’s loan portfolio composition as of June 30, 2019.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	6/30/2019		12/31/2018		12/31/2017	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	119,244	3.8%	137,157	4.4%	141,284	4.6%
Secured by One- to Four- Family Dwellings	958,819	30.6%	963,028	30.6%	950,871	31.2%
Other Real Estate: Farmland	60,774	1.9%	58,098	1.8%	57,516	1.9%
Other Real Estate: Multifamily	103,604	3.3%	99,627	3.2%	88,149	2.9%
Other Real Estate: Nonfarm nonresidential	853,105	27.2%	844,953	26.8%	856,826	28.1%
Commercial and Industrial	316,947	10.1%	297,954	9.5%	262,279	8.6%
Loans to Individuals	706,672	22.5%	729,212	23.2%	675,197	22.1%
Agricultural Loans	15,691	0.5%	18,062	0.6%	19,786	0.6%
Total	\$3,134,856	100.00%	\$3,148,091	100.00%	\$3,051,908	100.00%

* This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.



CTB's investment portfolio as of June 30, 2019, was \$806.2 million, which represented 18.5% of total assets. Investments in U.S. treasury and agency securities accounted for 45.5% of investments, while interest-bearing bank balances comprised 28.1% of investments. The remaining 26.4% of total investments consisted of municipal and all other securities.

No known legal impediments exist that would restrain CTB from meeting the credit needs of its assessment areas.

Previous Public Evaluation

CTB's performance was evaluated using the CRA procedures for large banks. CTB received a "Satisfactory" rating as a result of the May 11, 2015 CRA Performance Evaluation. The lending, investment, and service tests received "High Satisfactory" ratings.

SCOPE OF EVALUATION

For the purpose of this evaluation, CTB has five CRA assessment areas in Kentucky, Tennessee, and West Virginia. Assessment areas were reviewed for lending, investment, and service performance. All five assessment areas were selected for full-scope reviews. Criteria used to select full-scope assessment areas include: the volume of Home Mortgage Disclosure Act (HMDA) reportable and CRA small business lending by number of loans and dollar amount as a percentage of overall lending activity, deposit market share, number of branches, percentage of deposits, percentage of low- and moderate-income geographies, volume of community development activity, and other non-financial considerations.

Borrower distribution received greater weight than geographic distribution based on the percentage of families by family income compared to the percentage of low- and moderate-income geographies in the assessment area, unless otherwise noted. Nonmetropolitan Kentucky received the most weight in this evaluation because it is CTB's primary market. It has the most branches and the largest concentrations of lending, deposit, and community development activities. The Lexington-Fayette MSA received the second-highest weight because it has the next largest concentration of lending and deposits and a significant percentage of low- and moderate-income tracts. The Huntington-Ashland MSA received the third-highest weight due to its overall percentage of lending and branches and a significant percentage of low- and moderate-income tracts. The Knoxville MSA and Nonmetropolitan West Virginia assessment area¹ received the fourth- and fifth- highest weight, respectively.

Evaluation Period and Products Reviewed

This evaluation includes an analysis of HMDA- and CRA-reportable loans originated from January 1, 2015 through December 31, 2017. In the evaluation, 2018 HMDA-reportable loans

¹ The Knoxville MSA and Nonmetropolitan West Virginia assessment area received limited-scope reviews in the previous CRA Performance Evaluation. CTB had two assessment areas in Tennessee and in West Virginia. Due to changes made by the Office of Management of Budget to MSA delineations in 2014, the four assessment areas were consolidated into two. Specifically, Lincoln County, West Virginia was moved from the Charleston WV MSA to the Huntington-Ashland WV-KY-OH MSA, which resulted in no remaining branches in the Charleston, WV MSA; and Campbell County, Tennessee was moved to the Knoxville, TN MSA.

were unable to be considered due to lack of regulatory guidance for the additional reportable fields while this evaluation was being completed CRA-reportable and HMDA-reportable loans for 2018 will be analyzed in a subsequent performance evaluation. HMDA-reportable home purchase, home improvement, refinance, and CRA-reportable small business loans were the major lending products reviewed in this evaluation. However, due to limited volumes in the Knoxville and Nonmetropolitan West Virginia assessment areas, HMDA-reportable loan products were combined, in order to conduct a meaningful analysis, and CRA-reportable small business loans were not considered. Due to low volume levels, HMDA-reportable multi-family loans and CRA-reportable small farm loans were not considered in all five of the assessment areas. Lastly, other types of consumer loans that can be reported optionally were not included in the analysis.

Community development loans and investments funded between April 1, 2015, and October 7, 2019 were reviewed as part of the lending and investment tests, respectively. Investments with community development as a primary purpose that were funded during a prior evaluation period, but still outstanding as of December 31, 2018 also were considered. Community development services provided between April 1, 2015 and October 7, 2019 were reviewed as part of the service test evaluation.

A summary of the scope of the evaluation is in Appendix A.

Evaluation Analysis

CTB is an interstate bank with operations in Kentucky, Tennessee, and West Virginia. CTB meets the CRA regulation's asset-size criteria for large banks; it had assets of \$1.252 billion or more for both of the prior two calendar years; therefore, CTB is being evaluated under CRA procedures for large banks. In addition, CTB is subject to the HMDA and submits CRA (CRA) loan data to the Federal Reserve Board of Governors annually.

This evaluation of CTB's lending record in individual assessment areas includes the use of and comparison to demographic characteristics. The primary sources for demographic data are the U.S. Census Bureau and Dun & Bradstreet.² Demographic characteristics of a particular assessment area are useful in analyzing a financial institution's lending record, as they provide a means of estimating loan demand and identifying lending opportunities. To understand small business loan demand, self-reported data on revenue size and geographic location from business entities are collected and published by Dun & Bradstreet. However, the demographic data should not be construed as defining an expected level of lending in a particular area or to a particular group of borrowers. The data, along with housing and economic conditions information, is used to establish performance context and evaluate CTB accordingly.

Loans are evaluated to determine the lending activity inside and outside CTB's assessment areas. In addition, loans inside the assessment area are evaluated based on the geographic and borrower income distribution for each assessment area. The geographic distribution of HMDA loans is

² Demographic data: Includes 2010 U.S. Census Bureau, 2015 ACS, and Dun & Bradstreet data, plus the most current census data available. American Community Survey (ACS) data is part of the U.S. Census Bureau's Decennial Census Program and is designed to provide more current demographic, social, economic, and housing estimates throughout the decade. <https://dataferrett.census.gov/AboutDatasets/ACS.html>

assessed by comparing the percentage of loans made in each geography type (low-, moderate-, middle-, and upper-income) to the percentage of owner-occupied units in each geography type. Small business loans are compared to the percentage of small businesses in each geographic income category.

The distribution of HMDA-reportable loans by borrower income is assessed by comparing the percentage of loans made to borrowers in each income category (low-, moderate-, middle-, and upper-income) with the percentage of families in each income category. The distribution of small business loans by borrower income is assessed by comparing the percentage of loans made to businesses in each revenue category (less than or comparable to \$1 million and greater than \$1 million) to the percentage of total businesses in each revenue category.

CTB's lending performance also was compared to the performance of aggregate lenders in 2015, 2016, and 2017.³ Aggregate lenders include all lenders required to report HMDA-reportable and CRA-reportable small business lending data in the respective assessment areas. Lending market share also is discussed to give a better understanding of where CTB ranks in the respective areas. For retail services, CTB's branch distribution analysis was conducted using data as of June 30, 2016⁴ and June 30, 2017.

Community development activities were reviewed to determine whether they have community development as a primary purpose and meet the geographic requirements of the CRA. The eligibility of a loan, investment, or service is based on demographic information available to CTB at the time the community development activity was undertaken. Qualified community development activities were analyzed from quantitative and qualitative perspectives to better understand the volume of activity impacting a particular assessment area, the innovativeness of those activities, and the responsiveness to local community development and credit needs. When appropriate, peer comparisons were conducted using annualized metrics to gauge the relative performance of the institution in a particular assessment area.

To better understand assessment area community development and credit needs, several sources were used including publicly accessible data, information submitted by CTB, and plans describing the community development environment in local markets. Nine community contact interviews were conducted with representatives from affordable housing, economic development, and community and social services operating inside CTB's assessment areas. These individuals have expertise in their respective fields and are familiar with the economic, social, and demographic characteristics and community development opportunities in the assessment area. Information obtained from these interviews helped establish a context for the communities in which CTB operates and gather information on its performance.

Community contacts identified affordable housing as the area's most critical need, followed by workforce development, access to small dollar loans for small businesses, financial education training, and supportive services for struggling individuals and families impacted by the opioid crisis and higher rates of poverty and unemployment. Lastly, contacts identified several opportunities for bank participation. More detailed information obtained from individual

³ As of the start of this evaluation 2018 aggregate lender data was unavailable

⁴ 2016 branch distribution based on 2010 census data; 2017 branch distribution based on 2015 census data

community contacts is included in the “Description of the Institution’s Operations” section for each full-scope assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

CTB’s overall CRA performance is rated “Satisfactory.” Details are provided below, including facts, data, and analyses used to form conclusions regarding the lending, investment, and service test performance ratings. CTB’s CRA program includes a CRA compliance committee that monitors and discusses CRA activities to assist the bank in focusing on meeting the credit, service, and community development needs of its assessment areas. Areas for improvement in the CRA program include developing strategies to better provide community development activities across CTB’s delineated footprint and continuing to foster collaborative relationships with community partners to help develop products and services that are responsive to credit needs in the community.

Lending Test

CTB’s performance under the lending test is rated “High Satisfactory.” The lending test is rated Outstanding in the Commonwealth of Kentucky and High Satisfactory in the Huntington-Ashland multistate MSA, the State of Tennessee, and the State of West Virginia.

Overall, the penetration of loans among borrowers of different income levels and to businesses of different sizes is good. The geographic distribution of loans is good with moderate gaps in lending. Also, CTB makes a relatively high level of community development loans. Lastly, CTB is considered responsive to credit needs of low-income individuals and areas and very small businesses and commensurate with deposit activity. No conspicuous gaps in lending activity by income category were identified.

While CTB’s lending distribution by borrower income and geography is referenced throughout this evaluation, detailed information about HMDA-reportable and CRA-reportable small business loans can be found in Appendices D and E for full-scope assessment areas, respectively. In some assessment areas and product discussions, specific data are quoted from these tables to support relevant points; otherwise, general references are made about performance, and the reader should refer to the appendices for specific data.

Lending Activity

CTB’s lending levels reflect a good responsiveness to the credit needs across its assessment areas taking into consideration its strategic objectives, economic conditions, and competitive factors. Lending activity is good in all five assessment areas. While no substantial concentration of loans was identified in excluded counties within MSAs in CTB’s delineated footprint, a small concentration was identified in Jessamine County in the Lexington-Fayette MSA. In addition to lending, CTB modified existing real-estate secured loans to borrowers and made use of flexible lending practices. Loan modifications were assessed in Nonmetropolitan Kentucky⁵ to determine CTB’s ability to assist low- and moderate-income homeowners and in low- and moderate-income

⁵ Loan Modifications: Nonmetropolitan Kentucky was the only assessment area with enough volume to conduct a meaningful analysis

geographies avoid foreclosures.

As the data shows in the table below, CTB originated more HMDA-related loans by number and dollar amount than small business-related loans; as a result, HMDA-related lending typically had a greater impact on lending ratings. Detailed information about lending activity can be found in the multi-state and state sections of this evaluation.

Assessment Area Concentration

The following table shows the number and percentage of loans located inside and outside of CTB's assessment areas by loan type. As indicated below, CTB originated a high percentage of the total loans by volume (80.8%) and by dollar volume (76.5%) to borrowers and businesses in its assessment areas.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	1,533	87.8	\$60,292	83.3	214	12.2	\$12,119	16.7
Home Purchase - Conventional	2,192	79.1	\$317,239	76.8	580	20.9	\$95,784	23.2
Multi-Family Housing	48	71.6	\$47,943	76.2	19	28.4	\$14,984	23.8
Refinancing	1,279	83.6	\$180,708	82.6	250	16.4	\$38,177	17.4
Total HMDA related	5,052	82.6	\$606,182	79.0	1,063	17.4	\$161,064	21.0
Small Bus. - Secured by Real Estate	59	66.3	\$7,523	63.5	30	33.7	\$4,326	36.5
Small Business	1,706	80.7	\$204,177	71.5	409	19.3	\$81,276	28.5
Total Small Bus. related	1,765	80.1	\$211,700	71.2	439	19.9	\$85,602	28.8
Small Farm	328	62.7	\$20,615	66.1	195	37.3	\$10,558	33.9
Total Small Farm related	328	62.7	\$20,615	66.1	195	37.3	\$10,558	33.9
TOTAL LOANS	7,145	80.8	\$838,497	76.5	1,697	19.2	\$257,224	23.5

Note: Affiliate loans not included

CTB originated 82.6% of HMDA-related loans by volume and 79.0% by dollar amount and 80.1% of small business loans by volume and 71.2% by dollar amount to borrowers and businesses in its assessment areas. This indicates CTB's willingness to originate loans that meet the credit needs of its delineated assessment areas.

Distribution of Lending by Borrower Income, Business Revenue Size, and Geography

The overall distribution of loans among borrowers of different income levels and to businesses of different sizes is good. HMDA-reportable lending to borrowers of different income levels and to businesses of different sizes is good in Nonmetropolitan Kentucky, the Huntington-Ashland MSA, and the Lexington-Fayette MSA. HMDA-reportable lending to borrowers of different income levels is excellent in the Knoxville MSA and Nonmetropolitan West Virginia.

The overall geographic distribution of loans reflects a good penetration throughout the assessment area. The geographic distribution of HMDA-reportable loans is good in Nonmetropolitan

Kentucky, the Huntington-Ashland MSA, and Nonmetropolitan West Virginia and excellent in the Lexington-Fayette MSA and the Knoxville MSA. The geographic distribution of small business loans was good in Nonmetropolitan Kentucky, the Lexington-Fayette MSA, and the Huntington-Ashland MSA.

HMDA-reportable and small business lending analyses in each assessment area are discussed in detail later in this evaluation.

Community Development Loans

CTB made a relatively high level of community development loans during the evaluation period. Since the previous evaluation, CTB originated or renewed 57 community development loans totaling approximately \$58.2 million. The following table reflects the total number community development loans by purpose, number, and dollar amount.

Purpose of CD Loan	#	\$
Revitalization & Stabilization	35	\$32,668,029
Community Services	9	\$14,852,300
Economic Development	6	\$9,814,142
Affordable Housing	7	\$838,840
Total	57	\$58,173,311

The largest concentration of community development loans by state was in Kentucky with \$56.6 million, accounting for 97.4% by dollar volume of bank-wide community development lending. As a result, CTB is a leader in making community development loans in Kentucky. Performance in Nonmetropolitan Kentucky had the greatest impact and CTB’s performance and responsiveness was considered excellent in this assessment area, considering its size and presence in the market, competition, and community development opportunities. The majority (87.5%) of CTB’s community development lending by dollar volume (\$50.9 million) occurred in Nonmetropolitan Kentucky. The community development loans originated or renewed during the evaluation period were for a variety of purposes, including the revitalization/stabilization of targeted low- and moderate-income census tracts or other qualified geographies, community services targeted to low- and moderate-income individuals, the promotion of economic development by financing small businesses that resulted in permanent job creation and/or retention, and affordable housing for low- and moderate-income individuals. CTB makes a relatively high level of community development loans in the Lexington-Fayette MSA. Community development lending in this assessment area totaled \$5.8 million, accounting for 9.9% of bank-wide community development lending. These loans supported affordable housing, economic development, and services to low- and moderate-income individuals. Community development loans originated in Kentucky resulted in improved outcomes for low- and moderate-income individuals and families and helped to provide needed services or stabilize the economy. Community contacts stressed the critical need for affordable housing, home improvements, and drug treatment and other social services targeted to lower-income individuals and families as a result of the opioid crisis. These loans exhibited an excellent responsiveness to credit needs of lower income individuals and lower income and distressed geographies and very small businesses across CTB’s assessment areas in Kentucky.

Community development lending in Tennessee totaled \$1.5 million, accounting for 2.6% of bank-wide community development lending; CTB makes an adequate level of community development lending in the Knoxville MSA. CTB made no community development loans in either the Huntington-Ashland MSA or West Virginia; therefore, CTB makes few, if any community development loans in the multi-state MSA and in West Virginia. Although there are fewer branches and deposits in these assessment areas compared to those in Kentucky, CTB has a key presence in these markets and the capacity and resources to make enough community development loans in these areas to help meet assessment area credit needs. The relatively low amount of community development loans in these three markets had a negative impact on CTB's community development lending performance.

Consideration was given to several qualified community development loans that benefited counties within Kentucky and Tennessee, but outside CTB's delineated assessment areas. *Refer to Commonwealth of Kentucky and State of Tennessee /Conclusions with Respect to Performance Tests for more details.* Lastly, since CTB was responsive to the credit and community development needs in its assessment areas a community development loan without a purpose, mandate, or function of serving CTB's assessment areas was considered to positively impact performance. Consideration was given to a community development loan totaling \$2.8 million to a for-profit business to provide approximately 800 temporary housing units for displaced flood victims in Houston, Texas, designated as a major disaster area by the federal government in 2017 in the aftermath of Hurricane Harvey.

More information on individual community development loans can be found in the full-scope assessment area sections of this evaluation.

Flexible Lending Practices⁶

CTB makes use of flexible lending practices in serving credit needs of borrowers in low- and moderate-income geographies and to low- and moderate-income borrowers throughout its assessment area. These programs primarily are designed to assist first-time homebuyers with needed down payment or closing costs or small businesses with access to capital.

- **In-House Special Home Loan Program** – CTB developed a loan program for low- and moderate-income borrowers that make home ownership more affordable by reducing out-of-pocket expenses. Qualified borrowers are able to borrow up to 100% of the home's purchase price, private mortgage insurance is not required, eligible homebuyers can receive up to 3% of the home's purchase price (or \$3,000) for down payment assistance, and down payment as low as \$500 (may be gifted from family or non-profit). The interest rate is based on Freddie Mac's fixed rate product with no points/no origination fee and an interest rate that may be discounted by 1% for applicant(s) with incomes of 60% or less of the area's Median Family Income (MFI). For properties in low- or moderate-income areas, there is no income limitation. For properties not in low- or moderate-income areas, the applicant's income cannot exceed 80% MFI for the property location. The maximum

⁶ Unlike other large bank CRA performance criteria, a lack of innovative and/or flexible lending practices does not necessarily impact the bank's performance negatively. These activities are largely used to augment consideration given to an institution's performance under the quantitative criteria.

payment is limited to 30% of borrower’s income and the maximum debt-to-income is 43%. Escrow for taxes and insurance and homeownership counseling is required. In partnership with housing development agencies (Habitat for Humanity/REACH), CTB provided \$1.1 million in permanent financing to 11 qualified borrowers in the Huntington-Ashland MSA.

- Federal Home Loan Bank (FHLB) of Cincinnati Welcome Home Program: This FHLB program provides down payment assistance to low- and moderate-income individuals funded through direct subsidies from member banks. CTB provided direct subsidies totaling \$100,000 to 21 individuals through this program.
- Small Business Administration (SBA) 7(a) Loan Program: This program is the SBA’s most common loan program, offering funds to start-ups and existing small businesses with access to capital with more flexible repayment terms than conventional commercial financing for multiple purposes. CTB was listed as the number one community bank SBA lender in Kentucky for the past ten consecutive years. During the evaluation period, CTB originated 217 SBA 7(a) loans totaling \$38.7 million of which 166 loans (76.5%) totaling \$25.2 million (65.1%) were made inside CTB’s CRA footprint, and 51 loans (23.5%) totaling \$13.5 million (34.9%) were made in outside CTB’s delineated assessment area in Kentucky, Tennessee, and West Virginia.

Use of these products in serving low- and moderate-income individuals and in low- and moderate-income areas was considered when there was sufficient volume. Several community contacts noted affordable housing as a significant need across CTB’s CRA footprint. Use of these products enhanced CTB’s overall lending test performance.

More information on individual flexible lending programs can be found in the full-scope assessment area sections of this evaluation, if applicable.

Investment Test

CTB’s performance under the investment test is rated “Outstanding.” The investment test is rated Outstanding in the Commonwealth of Kentucky, the Huntington-Ashland multistate MSA, and the State of Tennessee. The investment test is rated High Satisfactory in the State of West Virginia.

CTB holds 123 qualified community development investments totaling \$42.6 million in this evaluation period. CTB obtained 99 new investments; these current period investments total approximately \$31.5 million and represent 74.1% of total investments. From prior periods, CTB holds 24 outstanding investments with a current book value of approximately \$11.1 million and represent 25.9% of total investments. The majority (72.4%) of CTB’s qualified investments by dollar volume (\$30.9 million) benefitted Kentucky and 11.7%, 11.8%, and 4.1% benefitted the Huntington-Ashland multistate assessment area, Tennessee, and West Virginia, respectively.

The following table reflects the total number of qualified community development investments by purpose, number, and dollar amount:

Purpose of CD Investment	#	\$
Affordable Housing	103	\$34,109,741
Community Services	17	\$4,720,325

Revitalization/Stabilization	2	\$2,375,965
Economic Development	1	\$1,365,000
Total	123	\$42,571,031

The majority of CTB’s qualified investments by dollar and number supported affordable housing initiatives primarily through a CRA Qualified Investment Fund that invests in mortgage pools guaranteed by various government mortgage agencies. CTB also invested in Low-Income Housing Tax Credits (LIHTC) and mortgage backed securities. Completed tax credit housing projects provide valuable affordable housing units and wraparound services and/or amenities for veterans, the elderly, and low- to moderate-income families and individuals. In addition, CTB invested in New Market Tax Credits (NMTC) which help incentivize businesses and real estate investment in low-income and impoverished communities and foster job creation. The remaining qualified investments were municipal school bonds that provide needed capital to schools or universities that serve majority low- and moderate-income student bodies. Community contacts stressed the critical need for all aspects of affordable housing and workforce development initiatives for lower-skilled workers that pay a livable wage. As a result, these qualified investments exhibit an excellent responsiveness to credit and community development needs Nonmetropolitan Kentucky and the Lexington-Fayette, Huntington-Ashland, and Knoxville metropolitan areas; and exhibit a good responsiveness in Nonmetropolitan West Virginia.

Qualified investments also included donations totaling \$1.5 million. CTB partners with a wide array of organizations and non-profits to fund outreach activities, affordable housing, educational programs, and initiatives aimed at responding to community needs, improving the financial stability of individuals and families, and revitalizing underserved communities. The following table reflects the total number community development donations by purpose, number, and dollar amount:

Purpose of CD Donation	#	\$
Community Services	329	\$875,979
Revitalization/Stabilization	54	\$517,376
Economic Development	15	\$61,005
Affordable Housing	24	\$53,884
Total	422	\$1,508,244

The largest percentage of donations made was in Kentucky, totaling \$1.4 million and representing 94.1% by dollar volume of total donations. Of the donations made in Kentucky 78.2% were made in Nonmetropolitan Kentucky and 21.8% were made in the Lexington-Fayette assessment area. Of the remaining total donations, 5.4% were made in the Huntington-Ashland multistate assessment area, 0.4% in West Virginia, and 0.1% in Tennessee.

Therefore, CTB made an excellent level of qualified community development investments, particularly those not routinely provided by private investors, often in a leadership position in Nonmetropolitan Kentucky, and in the Lexington-Fayette, Huntington-Ashland, and Knoxville metropolitan areas. CTB made a relatively high level of qualified community development investments and was occasionally in a leadership position in Nonmetropolitan West Virginia.

Consideration was given to several qualified community developments investments and donations that benefited a broader statewide or regional area in Kentucky, Tennessee, and West Virginia. *Refer to respective Conclusions with Respect to Performance Tests for more details.* Lastly, since CTB was responsive overall to the credit and community development needs a donation without a purpose, mandate, or function of serving CTB's assessment areas was considered to positively impact performance. Consideration was given to a donation totaling \$5,000 to the American Red Cross to provide aide to displaced flood victims in Houston, Texas, which was designated as a major disaster area by the federal government in 2017 in the aftermath of Hurricane Harvey.

More information detailing specific investments and contributions can be found in the full-scope assessment area sections of this evaluation.

Service Test

CTB's performance under the service test is rated "High Satisfactory." The service test is rated Outstanding in the Commonwealth of Kentucky, High Satisfactory in the Huntington-Ashland multistate MSA, and Low Satisfactory in the State of Tennessee and the State of West Virginia.

Retail Services

Since the previous evaluation, CTB has not opened or closed any branches; however, CTB consolidated two branches in middle-income tracts to nearby locations and closed 12 cash-only automated teller machines (ATMs) in Nonmetropolitan Kentucky and the Knoxville MSA. Therefore, CTB's record of opening and closing branches has not adversely affected the accessibility of its delivery systems. For this evaluation period, CTB has 81 branches and 83 cash-only ATMs.

Overall retail delivery systems are accessible to CTB's geographies and individuals of different income levels. Of CTB's branches 19.8% serve low- and moderate-income geographies. Performance is mainly the result of the distribution of branches in Kentucky where CTB has the majority of its branches; therefore, delivery systems are readily accessible in Nonmetropolitan Kentucky and accessible in the Lexington-Fayette MSA. Delivery systems are also accessible in the Huntington-Ashland MSA and reasonably accessible in Tennessee and West Virginia. Nonmetropolitan West Virginia is the only assessment area without a branch located in low- or moderate-income geographies; however, this assessment area has no low-income tracts and only had one moderate-income tract in 2015/2016 and three moderate-income tracts in 2017. Therefore, the lack of branches in moderate-income geographies in Nonmetropolitan West Virginia does not negatively impact performance. The geographic distribution of CTB's branches and cash-only ATMs as of June 30, 2017, is shown in the table below.

Geographic Distribution of Branches and ATMs

Exam: Community Trust Bank 2019
Assessment Group(s): Entire Bank - 2017

Analysis Year: 2017

Tract Income Levels	BRANCHES							ATMS								DEMOGRAPHICS						
	Total Branches		Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Total ATMS		Full Service				Cash Only				Census Tracts		Households	Total Businesses	
	#	%	#	#	#	#	#	Total	%	Total	%	Opened	Closed	Total	%	Opened	Closed	#	%	%	%	
Low	Total	2	2.5%	0	0	2	2	0	Total	3	3.6%	0	0	0	3	3.6%	0	0	20	4.9%	3.6%	4.2%
	DTO	0		0	0	0			Stand Alone	1		0	0	0	1		0	0				
	LS	0		0	0	0																
Moderate	Total	14	17.3%	0	0	14	13	9	Total	15	18.1%	0	0	0	15	18.1%	0	3	89	21.9%	20.9%	17.7%
	DTO	0		0	0	0			Stand Alone	0		0	0	0	0		3					
	LS	0		0	0	0																
Middle	Total	50	61.7%	0	2	42	40	23	Total	46	55.4%	0	0	0	46	55.4%	0	6	202	49.8%	52.3%	50.7%
	DTO	0		0	0	0			Stand Alone	9		0	0	9		0	5					
	LS	0		0	0	0																
Upper	Total	15	18.5%	0	0	13	15	14	Total	19	22.9%	0	0	0	19	22.9%	0	1	94	23.2%	23.2%	27.1%
	DTO	0		0	0	0			Stand Alone	5		0	0	5		0	1					
	LS	0		0	0	0																
Unknown	Total	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0	0	0	0.0%	0	0	1	0.2%	0.0%	0.2%
	DTO	0		0	0	0			Stand Alone	0		0	0	0		0	0					
	LS	0		0	0	0																
Totals	Total	81	100.0%	0	2	71	70	46	Total	83	100.0%	0	0	0	83	100.0%	0	10	406	100.0%	100.0%	100.0%
	DTO	0		0	0	0			Stand Alone	15		0	0	15		0	9					
	LS	0		0	0	0																

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows
*Closed branches are only included in the "Closed" columns and are not included in any other totals
(Represents consolidated branches)
LPOs not included in totals.

Banking services do not vary or inconvenience any portion of CTB’s assessment areas. Banking centers are generally open six days a week and provide lobby services full days Monday through Thursday (8:30 a.m. to 4:00 p.m.) and Friday (9:00 am to 6:00 pm) and half days on Saturday (8:30 a.m. – noon). Seventy of CTB’s offices offer extended hours until 5:30 pm or 6:00 p.m. during the week and 46 offices have weekend hours.

CTB used alternative delivery systems to supplement its branch and ATM networks. Alternative delivery systems primarily consist of website (*ctbi.com*) and mobile banking applications that allow for standard online banking capabilities (mobile app, security alerts/notifications, bill pay, deposits, person-to-person pay, Apple Pay, Samsung Pay, and Android Pay). CTB has seen an upward trend in digital banking enrollment in the last year,⁷ especially in mobile banking and remote deposits. Consumer and business mobile banking have increased 19.0% and 105.0%, respectively; and consumer and business mobile deposits have increased 29.0% and 145.0%, respectively. Lastly, person-to-person pay increased 50.0% in the last year. CTB also offers 24-hour telephone banking that provides customers with deposit and loan account information and funds transfer and loan payment capabilities. The website, mobile banking, and telephone banking services are available to all bank customers regardless of location or income.

Community Development Services

CTB is a leader in providing community development services throughout its assessment areas with 95 employees providing 5,546 hours of community development services and supporting 141 different organizations during the evaluation period. CTB is a leader in providing community development services in Nonmetropolitan Kentucky and the Huntington-Ashland MSA. CTB provides an adequate level of community development services in the Lexington-Fayette MSA and the Knoxville MSA. CTB provides a limited level of community development services in Nonmetropolitan West Virginia.

⁷ October 2018 – October 2019

The following table provides qualified community development services by hours. CTB employees had extensive involvement with organizations and activities that promote or facilitate community services targeted to low- and moderate-income individuals, economic development by financing small businesses, promote or facilitate affordable housing to low- and moderate-income individuals, and, to a lesser extent, revitalization/stabilization of low- and moderate-income areas.

Purpose of CD Service	# Organizations	# Services	# Hours
Community Services	74	305	2,888
Economic Development	38	266	2,086
Revitalization & Stabilization	18	74	401
Affordable Housing	6	22	171
Total	136	667	5,546

Community contacts indicated the critical need for all aspects of affordable housing and opportunities for financial institutions to provide access to capital to small businesses, workforce development, and social services targeted to low- and moderate-income individuals, particularly those impacted by the opioid crisis. The majority of community development services provided by CTB employees addressed these needs. As a result, community development services are considered to be responsive to available service opportunities.

Finally, consideration was given to community development services that benefited a broader statewide or regional area in Kentucky. *Refer to Commonwealth of Kentucky/Conclusions with Respect to Performance Tests for more details.*

CTB’s directors, officers, and staff provided their financial expertise to the community by engaging in activities that promoted or facilitated affordable housing, services for low- and moderate-income individuals, economic development, and revitalization of low- and moderate-income areas.

The variety of community development services, the impact and responsiveness to community development needs in various individual assessment areas, and the number of organizations and individuals that benefitted were the primary factors supporting the overall rating.

Community development services included, but were not limited to:

Financial Education

CTB offers the following financial workshops:

- National Endowment for Financial Education (NEFE) High School Financial Planning Program (HSFPP) – a non-profit that provides an assortment of stand-alone lessons organized into topical modules that includes money management, borrowing, and earning power. These lessons include activities, worksheets, and self-assessments.
- Apprisen – a non-profit that offers curriculum about establishing a money management plan, managing debt, understanding credit reports and scores, using credit wisely, building savings, bank account management, and consumer awareness.

- Employees also provide financial literacy services by participating in mock banks and reality stores. In reality store/mock bank scenarios each student is given a job and salary and various life circumstances (car repairs, medical crisis, etc.). These events allow students to progress through various stations, including a financial station, where they learn how to open a checking and/or savings account. It is an interactive way for students to acquire practical money management skills.

Board and Committee Memberships

CTB officers and managers provided financial expertise through their involvement with community development organizations throughout the assessment areas by serving as board directors, loan committee members, or treasurers.

Technical Assistance

CTB's employees provided technical assistance to community development and non-profit organizations. Technical assistance included fund raising, accounting and bookkeeping, applying for government grants, volunteer income tax assistance, and reviewing loan application requests.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

While management has implemented policies, procedures, training programs, and internal assessments, substantive violations of Section (5) of the Federal Trade Commission Act involving unfair and deceptive practices were identified in the concurrent Consumer Compliance examination. The violations did not cause the CRA rating to be adjusted. The violations were self-identified, and bank management was proactive in taking corrective action to address the violations.

MULTISTATE METROPOLITAN AREA
(Full-scope Review)

CRA RATING for Huntington-Ashland WV-KY-OH MSA #26580: Satisfactory

The lending test is rated: High Satisfactory
The investment test is rated: Outstanding
The service test is rated: High Satisfactory

The major factors supporting this rating include:

- A good responsiveness to credit needs;
- A good distribution of loans among borrowers of different income levels and to businesses of different revenue sizes;
- A good geographic distribution of loans throughout the assessment area;
- A good record of serving the credit needs of low-income individuals and areas and very small businesses exhibited
- Makes few, if any community development loans;
- Makes use of flexible lending practices in serving assessment area's credit needs;
- An excellent level of qualified community development investments and grants;
- Often in a leadership position in providing community development investments and grants;
- Retail delivery systems that are accessible to geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A leader in providing community development services.

SCOPE OF EVALUATION

A full-scope review was conducted for the Huntington-Ashland multistate assessment area. The time period and products evaluated for this assessment area are consistent with the scope discussed in the Institution section of this report.

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN
HUNTINGTON-ASHLAND WV-KY-OH MSA #26580**

The Huntington-Ashland WV-KY-OH MSA (Huntington-Ashland) consists of Cabell, Lincoln, and Wayne counties in West Virginia and Boyd and Greenup counties in Kentucky. CTB’s delineated assessment area excludes Putnam County in West Virginia and Lawrence County in Ohio. Due to changes in median family income levels resulting from changes in U.S. census data, this assessment area was comprised of the following tracts for this analysis:

Tract Income Level	2015/2016	2017
	Number of Tracts	Number of Tracts
Low	5	6
Moderate	17	18
Middle	34	30
Upper	11	12
Unknown	0	1
Total	67	67

This assessment area gained one low-income census tract, one moderate-income census tract, one upper-income census tract, and one unknown-income census tract and lost four middle-income census tracts.

As of June 30, 2018, CTB ranked sixth out of 19 institutions with 7.1% of the deposit market share.⁸ WesBanco Bank, Inc. had the largest deposit market share with 11.5%, followed by Huntington Federal Savings Bank, City National Bank of West Virginia (City National), JPMorgan Chase Bank, National Association (JPMorgan Chase), and Branch Banking and Trust Company (BB&T) with 10.5%, 10.4%, 10.3%, and 8.8%, respectively. Deposits in this assessment area accounted for 8.7% of CTB’s total deposits. This was the third-highest percentage of deposits within CTB’s CRA footprint.

From January 1, 2015 through December 31, 2017 CTB originated 330 HMDA-reportable loans and 171 CRA-reportable loans, which represents 6.5% and 10.0% of the total loans originated during the evaluation period. These are the third largest HMDA and CRA markets for loans originated during the evaluation period.

In 2017, CTB ranked tenth among 186 HMDA reporters in the assessment area. The top two HMDA lenders in the assessment area were City National and Quicken Loans, Inc. (Quicken). CTB ranked 12th of 59 CRA reporters in the assessment area in 2017. The top five CRA lenders in the assessment area were American Express Bank FSB (American Express), Synchrony Bank, Capital One Bank (USA), National Association (Capital One), Chase Bank USA, National Association (Chase Bank USA) and PNC. These lenders tend to be issuers of credit cards, and their CRA loans primarily consist of commercial credit card accounts.

⁸ Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report:
<https://www7.fdic.gov/sod/sodMarketBank.asp?barItem=2>

Interviews were conducted with two community contacts to provide additional information regarding the assessment area. The first contact was with an economic development organization which is focused on promoting and advancing the business prosperity and economic welfare in the area. The organization's operating funds are typically guaranteed each year due to the county being designated as distressed. The organization helps existing companies retain and expand their businesses and works to attract new businesses to the area. Partnerships with regional and state economic development agencies help this organization to provide access to training and resources for the area's small businesses. According to the contact, area unemployment remains high; as a result, residents may commute over an hour to work in either Charleston, West Virginia or Huntington, West Virginia in order to have access to higher paying jobs. While there are several universities in the area, graduates tend to leave to find good jobs. The area's working-age population tends not to have college degrees and may be addicted to opioids which impacts the local economy. The contact stated while there is a need for workforce development and access to small dollar loans, the area has a multitude of challenges due to the effects of the opioid epidemic.

The second contact was with a community development agency which provides a wide range of services targeted toward low- and moderate-income individuals and families in the Huntington-Ashland area. Programs include homecare for the low-income elderly, regional transportation for Medicaid patients, economic development grants, workforce development, and aging and disability services for low-income individuals and families. The agency works with low-income seniors to help keep them in their homes rather than go to long-term care facilities. While remaining at home provides many benefits, it can also lead to financial stress as these homes are generally older and in need of maintenance. The community has been highly impacted by the opioid epidemic and the repercussions of addiction extend beyond the addicted individuals, affecting child welfare, caregiving, public safety, criminal justice, housing, and the economy. The contact stated the area also been severely impacted by the shift from American steel to foreign steel; the agency has a workforce development program that provides re-employment services and programs to displaced steel workers. The agency also has a revolving loan fund program that offers low-interest loans to area start-up and existing businesses. These funds are used in the event that full financing cannot be obtained from a bank or to fill credit gaps between the bank's participation and the borrower's cash-contribution. The contact stated there are opportunities for area banks to work more closely with the University of Kentucky's Small Business Development Center (SBDC). Working with SBDC would help entrepreneurs establish a rapport with bankers and provide them additional opportunities to achieve better business results.

Population Characteristics

According to 2015 census data, the population in the assessment area was 245,277 of which 6.4% live in low-income tracts and 19.0% live in moderate-income tracts. In addition 78.9% of the population was 18 years of age or older, which is the legal age to enter into a contract. The population age 65 and over was 17.5% in Boyd County and 18.5% in Greenup County compared to 14.4% in Kentucky. The population age 65 and over was 16.6% in Cabell County, 16.5% in Lincoln, and 17.7% in Wayne County compared to 17.3% in West Virginia. The larger senior population, particularly in Greenup County, means this assessment area probably has a smaller working- and consumer-age population and reduced economic activity. The table below illustrates the population decreased in all counties within the assessment area.

Population Change					
Area	2010 Population	2015 Population	Percent Change 2010-2015	2018 Population	Percent Change 2015-2018
Boyd County (KY)	49,607	48,507	-2.2%	47,240	-2.6%
Greenup County (KY)	36,892	35,982	-2.5%	35,268	-2.0%
Cabell County (WV)	96,349	96,462	0.1%	93,224	-3.4%
Lincoln County (WV)	21,683	21,292	-1.8%	20,599	-3.3%
Wayne County (WV)	42,444	41,187	-3.0%	39,944	-3.0%
State of Kentucky	4,339,367	4,422,057	1.9%	4,468,402	1.0%
State of West Virginia	1,852,994	1,839,767	-0.7%	1,805,832	-1.8%

Source: U.S. Census Bureau- American Fact Finder - 2017 Populations and 2018 Population Estimates

Huntington, West Virginia (Cabell County) is the most populous city in this assessment area with 46,048 residents and its population decreased 6.4% between 2010 and 2018. Ashland, Kentucky (Boyd County) the second-most populous city has 20,382 residents, and its population decreased by 6.0% between 2010 and 2018.⁹

Income Characteristics

The 2010 median family income (\$52,071) in the assessment area was less than Kentucky median family income (\$55,367) and West Virginia median family income (\$52,866). As shown below, the assessment area median family income increased in 2017 and 2018, respectively.

Borrower Income Levels													
Huntington-Ashland, WV-KY-OH - MSA													
HUDEstimated Median Family Income		Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2017	\$55,100	0	-	\$27,549	\$27,550	-	\$44,079	\$44,080	-	\$66,119	\$66,120	-	& above
2018	\$56,900	0	-	\$28,449	\$28,450	-	\$45,519	\$45,520	-	\$68,279	\$68,280	-	& above

The counties in this assessment area are located in rural Appalachia and have poverty rates ranging from 28.3% in Lincoln County, West Virginia to 16.0% in Greenup County, Kentucky from 2015 through 2017. In addition, Boyd County, Kentucky and Cabell, Lincoln, and Wayne counties in West Virginia had poverty rates greater than 20.0%. Greenup County, Kentucky was the only rural Appalachian county in this assessment area with poverty rates below the state average during this period. Area poverty rates shown below illustrate a concerning trend of poverty and economic stagnations among rural residents in Appalachian West Virginia especially.

¹ U.S. Census Bureau QuickFacts:
<https://www.census.gov/quickfacts/fact/table/ashlandcitykentucky,huntingtoncitywestvirginia/PST045218>

Poverty Rates					
County	2015	2016	Percentage Point Change 2015-2016	2017	Percentage Point Change 2016-2017
Boyd County (KY)	20.5%	18.2%	-2.3	20.1%	1.9
Greenup County (KY)	16.8%	17.4%	0.6	16.0%	-1.4
Cabell County (WV)	20.2%	21.9%	1.7	26.1%	4.2
Lincoln County (WV)	28.3%	24.2%	-4.1	25.7%	1.5
Wayne County (WV)	22.5%	21.5%	-1.0	20.4%	-1.1
Kentucky	18.3%	18.2%	-0.1	17.1%	-1.1
West Virginia	18.0%	17.9%	-0.1	18.5%	0.6
U. S.	14.7%	14.0%	-0.7	13.4%	-0.6

Source: U.S. Census Bureau

According to 2015 census data, 21.2% of the 98,241 households in this assessment area are below the poverty level, 2.6% are receiving public assistance, and 13.1% have rent costs greater than 30.0% of their monthly income.

Housing Characteristics

According to the 2015 census data, there are 113,484 housing units and 62,870 families in the assessment area. From an income perspective, 7.7% of the housing units and 5.3% of families are in the assessment area's low-income tracts, while 20.1% of the housing units and 17.9% of families in the assessment area are in moderate-income tracts. In addition, 27.9% of the housing units in low-income tracts are owner occupied, 52.4% are rental and 19.7% are vacant while 50.1% of housing units in moderate-income tracts are owner-occupied, 32.5% are rental, and 17.4% are vacant. Therefore, based on the low number of families and housing units and the high percentage of rental/vacant units, there appears to be limited credit-related opportunities for CTB to make home purchase loans in low- and moderate-income tracts and provide various aspects of affordable housing, particularly in low-income tracts.

The 2015 census data shows the median age of housing stock was 50 years old, and 24.5% of assessment area's 113,484 housing units are at least 65 years old (built before 1950). This indicates there are opportunities to make home improvement loans. The median housing value in the assessment area was \$97,287 with an affordability ratio of 40.9. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. As indicated in the table below, median housing values increased between 2010 and 2015 except in Wayne County and the greatest increase in housing values occurred in Lincoln County. During this same time period housing became less affordable in Greenup, Cabell, and Lincoln counties most likely because median family income did not keep pace with home price growth; however, housing became slightly more affordable in Boyd and Wayne counties. In addition, median gross rents increased across the assessment area, particularly in Boyd County. The table below presents housing characteristics from the census data between 2010 and 2015 in the assessment area, Kentucky and West Virginia.

Housing Costs Change								
Area	Median Housing Value		Percent Change	2010 Affordability Ratio	2015 Affordability Ratio	Median Gross Rent		Percent Change
	2010	2015				2010	2015	
Boyd County (KY)	93,200	99,700	7.0%	41.6	42.5	533	625	17.3%
Greenup County (KY)	88,400	97,700	10.5%	47.9	46.4	550	629	14.4%
Cabell County (WV)	97,500	112,800	15.7%	35.4	34.0	590	653	10.7%
Lincoln County (WV)	65,100	81,000	24.4%	47.4	44.2	485	524	8.0%
Wayne County (WV)	85,500	82,800	-3.2%	41.0	43.9	525	589	12.2%
Kentucky	116,800	123,200	5.5%	35.6	35.5	601	675	12.3%
West Virginia	94,500	103,800	9.8%	40.6	40.2	549	643	17.1%

Source: U.S. Census Bureau

According to 2015 census data, 32.7% of renters in the assessment area have rent costs more than \$700 a month and nearly 42.4% of units for rent (30,246) have renters who are considered to be cost burdened or have rent costs greater than 30.0% of their monthly income. Increasing rental costs may make it more difficult for potential first-time homebuyers to save enough to make a sufficient down payment in the rising interest rate environment.

Building permits are a leading indicator of future activity in the construction sector. As indicated in the table below, building permits fell well below statewide and national trends between 2017 and 2018 in Cabell County.

Building Permits					
County	2016	2017	Percent Change 2016-2017	2018	Percent Change 2017-2018
Boyd County (KY)	0	2	N/A	2	0.0%
Greenup County (KY)	15	15	0.0%	17	13.3%
Cabell County (WV)	45	68	51.1%	65	-4.4%
Lincoln County (WV)	14	16	14.3%	18	12.5%
Wayne County (WV)	21	25	19.0%	28	12.0%
Kentucky	12,714	12,630	-0.7%	13,826	9.5%
West Virginia	2,544	2,719	6.9%	2,887	6.2%
U. S.	1,206,642	1,281,977	6.2%	1,328,827	3.7%

Source: U.S. Bureau of Labor Statistics

The overall increase in the number of permits could indicate an increasing demand for home purchase loans during this evaluation period.

Labor, Employment, and Economic Characteristics

The Appalachian region covers all of West Virginia and parts of 12 other states, including Kentucky. Employment has traditionally relied on mining and manufacturing but tourism is steadily gaining in popularity due to the scenic landscapes and forests. Historically, Appalachia

has battled poverty, unemployment, stagnant industry, and lower educational attainment and wages. While progress has been made to narrow those gaps, significant divisions remain between Appalachia and the rest of the nation. The Appalachian Regional Commission (ARC),¹⁰ a federal-state partnership dedicated to promoting economic development and addressing quality of life issues for Appalachian residents, releases annual listings of each Appalachian county’s economic health from best to worst. Every county is designated as either attainment, competitive, transitional, at-risk, or distressed. The ARC bases its classifications on several economic indicators, including poverty rates, per capita market income, and three-year average of unemployment rates.

The rural Appalachian counties in this assessment area appear to be making improvements in economic status but are still experiencing economic stagnation and higher levels of unemployment and poverty, particularly in Lincoln County, West Virginia.

County Economic Status in the Appalachian Region, FY 2017	
Area	Economic Status
Boyd County, Kentucky	Transitional
Greenup County, Kentucky	Transitional
Cabell County, West Virginia	Transitional
Lincoln County, West Virginia	Distressed
Wayne County, West Virginia	Transitional
<i>Source: Appalachian Regional Commission</i>	

According to Dun & Bradstreet, the majority of businesses (87.4%) in the assessment area have revenue under \$1 million. There are approximately 98,003 paid employees in this assessment area who are working in either the private sector or government according to Kentucky Cabinet for Economic Development and Workforce West Virginia. By percentage of employees, the largest job category in the assessment area is education and health services, followed by trade/transportation/utilities, government, leisure/hospitality, and professional/business sector.

The table below illustrates the average unemployment rates related to this assessment area.

¹⁰ Appalachian Regional Commission (ARC) – County Economic Status, FY 2017:
https://www.arc.gov/reports/region_report.asp?FIPS=21999&REPORT_ID=62

Unemployment Rates
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580

Area	Years - Annualized	
	2017	2018
Boyd County, KY	7.2	5.9
Greenup County, KY	7.7	6.6
Cabell County, WV	4.5	4.7
Lincoln County, WV	6.8	6.9
Wayne County, WV	5.8	6.0
Huntington-Ashland, WV-KY-OH MSA #26580	5.7	5.5
Kentucky	4.9	4.3
West Virginia	5.2	5.3
National	4.4	3.9

Not Seasonally Adjusted

Data extracted on October 3, 2019

Between 2017 and 2018 unemployment rates declined in Boyd and Greenup counties in Kentucky and increased in Cabell, Lincoln, and Wayne counties in West Virginia. Only Cabell County had an unemployment rate lower than the state rate. Overall, unemployment rates across the assessment area were greater than the national unemployment rate during this time period.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
HUNTINGTON-ASHLAND WV-KY-OH MSA #26580**

Lending Test

CTB’s performance relative to the lending test in the Huntington-Ashland MSA is rated “High Satisfactory.”

CTB’s lending activity demonstrates a good responsiveness to the credit needs of the community but makes few, if any community development loans. CTB made no community development loans in this assessment area during the evaluation period. CTB has a good distribution among borrowers of different income levels and to businesses of different revenue sizes, and a good geographic distribution of loans; however, there was a significant level of lending gaps. CTB makes use of flexible lending practices in serving credit needs in this assessment area. Lastly, CTB exhibits a good record of serving the credit needs of low-income individuals and areas and businesses with gross annual revenues of \$1 million or less.

Borrower distribution received greater weight than geographic distribution based on the percentage of families by family income compared to the percentage of low- and moderate-income geographies in this assessment area. Greatest consideration was given to the evaluation of small business lending followed by home purchase, home improvement and refinance lending based on the overall volume of loans. Details of CTB’s residential mortgage and small business lending and information regarding peer lending is in Appendices D, E and F.

Lending Activity

Lending levels reflect a good responsiveness to the credit needs in the assessment area. CTB originated 330 HMDA loans and 171 CRA loans and had a significant level of lending gaps in this assessment area during the evaluation period. The percentage of CTB's lending in the Huntington-Ashland MSA is 7.1% while the percentage of total deposits is greater at 8.7%. Lastly, no substantial concentration of loans was identified in excluded counties within this MSA.

Distribution by Borrower Income and Revenue Size of the Business

CTB's overall distribution among borrowers of different income levels and businesses of different sizes is good. Borrower distribution is good for small business lending, adequate for home purchase lending, and good for home improvement and refinance lending.

Small Business Lending

CTB made 62 small business loans totaling \$8.1 million to businesses of different sizes in 2017, and 36 (58.1%) of these loans totaling \$5.5 million (68.2%) were made to businesses with revenues of \$1 million or less. While this is below the percentage of small businesses in the assessment area at 87.4%, the percentage of loans by volume and dollar amount exceeded the 2017 aggregate of all lenders at 44.9% and 37.8%, respectively. Therefore, the distribution of small business loans to businesses of different sizes is good considering CTB's performance relative to aggregate of all lenders.

In 2017 CTB made an adequate percentage of small dollar loans (56.5%) in amounts of \$100,000 or less compared to 61.7% of small dollar loans made by aggregate of all lenders. This indicates CTB's willingness to lend in smaller amounts which tend to represent amounts typically requested by small businesses.

CTB made 50 small business loans totaling \$8.4 million to businesses of different sizes in 2016, and 32 (64.0%) of these loans totaling \$5.7 million (67.7%) were made to businesses with revenues of \$1 million or less. While this is below the percentage of small businesses in the assessment area at 88.7%, the percentage of loans by volume and dollar amount exceeded the 2016 aggregate of all lenders at 46.0% and 44.1%, respectively. Therefore, the distribution of small business loans to businesses of different sizes is good considering CTB's performance relative to aggregate of all lenders.

In 2016 CTB made an adequate percentage of small dollar loans (60.0%) in amounts of \$100,000 or less compared to 90.7% of small dollar loans made by aggregate of all lenders. This indicates CTB's willingness to lend in smaller amounts which tend to represent amounts typically requested by small businesses.

CTB made 59 small business loans totaling \$7.4 million to businesses of different sizes in 2015, and 42 (71.2%) of these loans totaling \$4.7 million (62.8%) were made to businesses with revenues of \$1 million or less. While this is below the percentage of small businesses in the assessment area at 90.4%, the percentage of loans by volume and dollar amount exceeded the

2015 aggregate of all lenders at 42.7% and 38.5%, respectively. Therefore, the distribution of small business loans to businesses of different sizes is excellent considering CTB's performance relative to proxy by volume and aggregate of all lenders.

In 2015 CTB made a good percentage of small dollar loans (74.6%) in amounts of \$100,000 or less compared to 91.4% of small dollar loans made by aggregate of all lenders. This indicates CTB's willingness to lend in smaller amounts which tend to represent amounts typically requested by small businesses.

Overall CTB's small business lending performance was below the percentage of small businesses and exceeded aggregate of all lenders by volume and dollar amount. In addition, community contacts indicated a need for access to small dollar loans for new and existing businesses and the need for entrepreneurs and bankers to establish rapport in order to achieve better business results. Also, CTB displayed a consistent willingness to make small dollar loans. Therefore, borrower distribution of small business lending is good.

Home Purchase Lending

CTB made 49 home purchase loans totaling \$6.6 million in 2017. Also, CTB originated three (6.1%) home purchase loans totaling \$349,000 (5.8%) to borrowers with unknown-income designations compared to aggregate of all lenders that made 15.2% by volume and 14.3% by dollar amount to borrowers with unknown-income designations.

In 2017 CTB made six (12.2%) home purchase loans totaling \$402,000 (6.6%) to low-income borrowers, which was well below the percentage of families at 24.7%. However, the percentage of loans by volume and dollar amount exceeded the 2017 aggregate of all lenders at 7.0% and 3.4%, respectively. While CTB's performance was poor compared to proxy, given CTB's strong performance compared to aggregate of all lenders, the borrower distribution of home purchase loans to low-income borrowers is excellent.

CTB made nine (18.4%) home purchase loans totaling \$734,000 (12.1%) to moderate-income borrowers, which exceeded the percentage of families at 17.1% by volume and fell below by dollar amount. However, the percentage of loans by volume and dollar amount was comparable to the 2017 aggregate of all lenders at 19.1% and 13.1%, respectively. Given CTB's strong performance compared proxy and comparable performance compared to aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

CTB made eight home purchase loans totaling \$712,000 to middle-income borrowers. This represents 16.3% of home purchase loans by volume and 11.7% by dollar amount, compared to the percentage of families at 20.0%. The 2017 aggregate of all lenders made 21.7% by volume and 19.2% by dollar amount to middle-income borrowers.

CTB made 23 home purchase loans totaling \$3.9 million to upper-income borrowers. This represents 46.9% of home purchase loans by volume and 63.8% by dollar amount, compared to the percentage of families at 38.3%. The 2017 aggregate of all lenders made 37.1% by volume and 50.0% by dollar amount to upper-income borrowers.

CTB made 41 home purchase loans totaling \$4.9 million in 2016. Also, CTB originated five (12.2%) home purchase loans totaling \$375,000 (7.7%) to borrowers with unknown-income designations compared to aggregate of all lenders that made 17.7% by volume and 14.8% by dollar amount to borrowers with unknown-income designations.

In 2016 CTB made two (4.9%) home purchase loans totaling \$163,000 (3.3%) to low-income borrowers, which was well below the percentage of families at 23.5%. The percentage of loans by volume and dollar amount was below the 2016 aggregate of all lenders at 7.5% and 3.9%, respectively. While CTB's performance was very poor compared to proxy, CTB's performance was adequate compared to aggregate of all lenders. Therefore, the borrower distribution of home purchase loans to low-income borrowers is adequate.

CTB made five (12.2%) home purchase loans totaling \$401,000 (8.2%) to moderate-income borrowers, which was below the percentage of families at 18.3%. The percentage of loans by volume and dollar amount was below the 2016 aggregate of all lenders at 19.1% and 13.7%, respectively. Given CTB's performance compared proxy and aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is adequate.

CTB made ten home purchase loans totaling \$1.1 million to middle-income borrowers. This represents 24.4% of home purchase loans by volume and 21.8% by dollar amount, compared to the percentage of families at 20.5%. The 2016 aggregate of all lenders made 23.6% by volume and 21.3% by dollar amount to middle-income borrowers.

CTB made 19 home purchase loans totaling \$2.9 million to upper-income borrowers. This represents 46.3% of home purchase loans by volume and 59.0% by dollar amount, compared to the percentage of families at 37.6%. The 2016 aggregate of all lenders made 32.0% by volume and 46.2% by dollar amount to upper-income borrowers.

CTB made 31 home purchase loans totaling \$5.2 million in 2015. Also, CTB originated four (12.9%) home purchase loans totaling \$657,000 (12.6%) to borrowers with unknown-income designations compared to aggregate of all lenders that made 14.8% by volume and 14.2% by dollar amount to borrowers with unknown-income designations.

In 2015 CTB made no home purchase loans to low-income borrowers, while the percentage of families is 23.5% and the 2017 aggregate of all lenders are 7.3% and 3.5% by volume and dollar amount, respectively. Compared to proxy and aggregate of all lenders, the borrower distribution of home purchase loans to low-income borrowers is very poor.

CTB made two (6.5%) home purchase loans totaling \$190,000 (3.6%) to moderate-income borrowers, which was well below the percentage of families at 18.3%. The percentage of loans by volume and dollar amount was also below the 2015 aggregate of all lenders at 18.8% and 12.5%, respectively. Given CTB's performance compared proxy and aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is poor.

CTB made ten home purchase loans totaling \$1.5 million to middle-income borrowers. This represents 32.3% of home purchase loans by volume and 28.2% by dollar amount, compared to

the percentage of families at 20.5%. The 2015 aggregate of all lenders made 23.8% by volume and 22.1% by dollar amount to middle-income borrowers.

CTB made 15 home purchase loans totaling \$2.9 million to upper-income borrowers. This represents 48.4% of home purchase loans by volume and 55.6% by dollar amount, compared to the percentage of families at 37.6%. The 2015 aggregate of all lenders made 35.2% by volume and 47.7% by dollar amount to upper-income borrowers.

Overall CTB's home purchase performance varied substantially compared to the percentage of families and aggregate of all lenders; therefore, borrower distribution of home purchase lending is adequate.

Home Improvement Lending

CTB made 32 home improvement loans totaling \$1.0 million in 2017. Also, CTB did not originate any home improvement loans to borrowers with unknown-income designations compared to aggregate of all lenders that made 3.6% by volume and 5.5% by dollar amount to borrowers with unknown-income designations.

In 2017 CTB made four (12.5%) home improvement loans totaling \$7,000 (0.7%) to low-income borrowers, which was substantially below the percentage of families at 24.7%. However, the percentage of loans by volume substantially exceeded the 2017 aggregate of all lenders at 7.1% and was well below aggregate at 2.5% by dollar volume. CTB made some very small dollar home improvement loans to low-income borrowers, which is needed given the older housing stock. This shows CTB's willingness to make small dollar loans. Given CTB's performance compared to proxy and aggregate of all lenders by volume, the borrower distribution of home improvement loans to low-income borrowers is good.

CTB made six (18.8%) home improvement loans totaling \$38,000 (3.8%) to moderate-income borrowers, which exceeded the percentage of families at 17.1% by volume and was well below by dollar amount. However, the percentage of loans by volume was comparable to the 2017 aggregate of all lenders at 21.5% and well below by dollar amount at 13.2%. Given CTB's mixed performance compared proxy and aggregate of all lenders, the borrower distribution of home improvement loans to moderate-income borrowers is good.

CTB made five home improvement loans totaling \$20,000 to middle-income borrowers. This represents 15.6% of home improvement loans by volume and 2.0% by dollar amount, compared to the percentage of families at 20.0%. The 2017 aggregate of all lenders made 23.8% by volume and 19.4% by dollar amount to middle-income borrowers.

CTB made 17 home improvement loans totaling \$945,000 to upper-income borrowers. This represents 53.1% of home improvement loans by volume and 93.6% by dollar amount, compared to the percentage of families at 38.3%. The 2017 aggregate of all lenders made 47.1% by volume and 59.4% by dollar amount to upper-income borrowers.

CTB made 39 home improvement loans totaling \$1.6 million in 2016. Also, CTB originated three (7.7%) home improvement loans totaling \$243,000 (14.5%) to borrowers with unknown-income designations compared to aggregate of all lenders that made 4.0% by volume and 4.6% by dollar amount to borrowers with unknown-income designations.

In 2016 CTB made two (5.1%) home improvement loans totaling \$10,000 (0.6%) to low-income borrowers, which was substantially below the percentage of families at 23.5%. The percentage of loans by volume was also below the 2016 aggregate of all lenders at 11.8% by volume and 4.5% by dollar amount. Given CTB's performance compared proxy and aggregate of all lenders, the borrower distribution of home improvement loans to low-income borrowers is poor.

CTB made 11 (28.2%) home improvement loans totaling \$185,000 (11.0%) to moderate-income borrowers, which was well above the percentage of families at 18.3% by volume and below proxy by dollar amount. However, the percentage of loans by volume substantially exceeded the 2016 aggregate of all lenders at 19.5% and was comparable by dollar amount at 14.0%. Given CTB's strong performance compared proxy and aggregate of all lenders by volume, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

CTB made 12 home improvement loans totaling \$517,000 to middle-income borrowers. This represents 30.8% of home improvement loans by volume and 30.8% by dollar amount, compared to the percentage of families at 20.5%. The 2016 aggregate of all lenders made 24.7% by volume and 18.9% by dollar volume to middle-income borrowers.

CTB made 11 home improvement loans totaling \$722,000 to upper-income borrowers. This represents 28.2% of home improvement loans by volume and 43.1% by dollar amount, compared to the percentage of families at 37.6%. The 2016 aggregate of all lenders made 40.0% by volume and 58.0% by dollar amount to upper-income borrowers.

CTB made 39 home improvement loans totaling \$2.0 million in 2015. Also, CTB originated one (2.6%) home improvement loan totaling \$103,000 (5.2%) to a borrower with an unknown-income designation compared to aggregate of all lenders that made 2.6% by volume and 8.3% by dollar amount to borrowers with unknown-income designations.

In 2015 CTB made five (12.8%) home improvement loans totaling \$42,000 (2.1%) to low-income borrowers, which was below the percentage of families at 23.5% by volume and substantially below by dollar amount. The percentage of loans exceeded the 2015 aggregate of all lenders at 7.3% by volume and was below by dollar amount at 3.0%. Given CTB's strong performance compared aggregate of all lenders by volume, the borrower distribution of home improvement loans to low-income borrowers is good.

CTB made seven (17.9%) home improvement loans totaling \$132,000 (6.7%) to moderate-income borrowers, comparable to the percentage of families at 18.3% by volume and well below proxy by dollar amount. However, the percentage of loans by volume was below the 2015 aggregate of all lenders at 21.4% and by dollar amount at 11.7%. Given CTB's comparable performance to proxy and aggregate of all lenders by volume, the borrower distribution of home improvement loans to moderate-income borrowers is good.

CTB made 11 home improvement loans totaling \$432,000 to middle-income borrowers. This represents 28.2% of home improvement loans by volume and 22.0% by dollar amount, compared to the percentage of families at 20.5%. The 2015 aggregate of all lenders made 20.1% by volume and 15.2% by dollar amount to middle-income borrowers.

CTB made 15 home improvement loans totaling \$1.3 million to upper-income borrowers. This represents 38.5% of home improvement loans by volume and 63.9% by dollar amount, compared to the percentage of families at 37.6%. The 2015 aggregate of all lenders made 48.6% by volume and 61.8% by dollar amount to upper-income borrowers.

Overall CTB's home improvement performance was comparable to the percentage of families and exceeded aggregate of all lenders; therefore, borrower distribution of home purchase lending is good, especially since CTB made some very small dollar home improvement loans to low-income borrowers, which is needed given the older housing stock.

Refinance Lending

CTB made 27 refinance loans totaling \$3.7 million in 2017. Also, CTB did not originate any refinance loans to borrowers with unknown-income designations compared to aggregate of all lenders that made 13.1% by volume and 14.5% by dollar amount to borrowers with unknown-income designations.

In 2017 CTB made two (7.4%) refinance loans totaling \$69,000 (1.9%) to low-income borrowers, which was well below the percentage of families at 24.7%. However, the percentage of loans by volume exceeded the 2017 aggregate of all lenders at 6.5% and was below aggregate of all lenders at 3.1% by dollar volume. Given CTB's performance compared to aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is adequate.

CTB made two (7.4%) refinance loans totaling \$241,000 (6.5%) to moderate-income borrowers, which was well below the percentage of families at 17.1%. The percentage of loans was below the 2017 aggregate of all lenders by volume and dollar amount at 13.8% and 9.3%, respectively. Given CTB's performance compared aggregate of all lenders, the borrower distribution of refinance loans to moderate-income borrowers is adequate.

CTB made six refinance loans totaling \$530,000 to middle-income borrowers. This represents 22.2% of refinance loans by volume and 14.4% by dollar amount, compared to the percentage of families at 20.0%. The 2017 aggregate of all lenders made 21.9% by volume and 17.6% by dollar amount to middle-income borrowers.

CTB made 17 refinance loans totaling \$2.9 million to upper-income borrowers. This represents 63.0% of refinance loans by volume and 77.2% by dollar amount, compared to the percentage of families at 38.3%. The 2017 aggregate of all lenders made 44.7% by volume and 55.6% by dollar amount to upper-income borrowers.

CTB made 28 refinance loans totaling \$3.1 million in 2016. Also, CTB originated two (7.1%) refinance loans totaling \$417,000 (13.3%) to borrowers with unknown-income designations

compared to aggregate of all lenders that made 16.3% by volume and 19.2% by dollar amount to borrowers with unknown-income designations.

In 2016 CTB made no refinance loans to low-income borrowers, while the percentage of families was at 23.5% and the 2016 aggregate of all lenders was 7.0% by volume and 3.6% by dollar amount. Given CTB's performance compared proxy and aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is very poor.

CTB made four (14.3%) refinance loans totaling \$216,000 (6.9%) to moderate-income borrowers, which was below the percentage of families at 18.3%. However, the percentage of loans by volume was comparable to the 2016 aggregate of all lenders at 15.0% and was below by dollar amount at 9.2%. Given CTB's performance compared proxy and aggregate of all lenders by volume, the borrower distribution of refinance loans to moderate-income borrowers is good.

CTB made eight refinance loans totaling \$800,000 to middle-income borrowers. This represents 28.6% of refinance loans by volume and 25.6% by dollar amount compared to the percentage of families at 20.5%. The 2016 aggregate of all lenders made 20.7% by volume and 17.0% by dollar amount to middle-income borrowers.

CTB made 14 refinance loans totaling \$1.7 million to upper-income borrowers. This represents 50.0% of refinance loans by volume and 54.2% by dollar amount, compared to the percentage of families at 37.6%. The 2016 aggregate of all lenders made 41.1% by volume and 51.0% by dollar amount to upper-income borrowers.

CTB made 31 refinance loans totaling \$3.8 million in 2015. Also, CTB originated one (3.2%) refinance loan totaling \$348,000 (9.2%) to a borrower with an unknown-income designation compared to aggregate of all lenders that made 16.2% by volume and 18.0% by dollar amount to borrowers with unknown-income designations.

In 2015 CTB made three (9.7%) refinance loans totaling \$244,000 (6.5%) to low-income borrowers, which was below the percentage of families at 23.5%. However, the percentage of loans substantially exceeded the 2015 aggregate of all lenders at 7.5% by volume and 3.7% by dollar amount. Given CTB's strong performance compared aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is good.

CTB made four (12.9%) refinance loans totaling \$269,000 (7.1%) to moderate-income borrowers, which was below the percentage of families at 18.3% by volume and well below proxy by dollar amount. However, the percentage of loans was comparable to the 2015 aggregate of all lenders at 14.4% by volume and 9.5% by dollar amount. Given CTB's performance to proxy and aggregate of all lenders by volume, the borrower distribution of refinance loans to moderate-income borrowers is good.

CTB made ten refinance loans totaling \$985,000 to middle-income borrowers. This represents 32.2% of refinance loans by volume and 26.1% by dollar amount, compared to the percentage of families at 20.5%. The 2015 aggregate of all lenders made 20.2% by volume and 17.5% by dollar amount to middle-income borrowers.

CTB made 13 refinance loans totaling \$1.9 million to upper-income borrowers. This represents 41.9% of refinance loans by volume and 51.1% by dollar amount, compared to the percentage of families at 37.6%. The 2015 aggregate of all lenders made 41.6% by volume and 51.3% by dollar amount to upper-income borrowers.

Overall CTB’s refinance performance was comparable to the percentage of families and exceeded aggregate of all lenders; therefore, borrower distribution of refinance lending is good.

Geographic Distribution of Loans

CTB’s overall distribution of lending among geographies is good. Home purchase and refinance lending is adequate and home improvement lending is excellent. Small business loans are good. The following gaps in lending were noted in the assessment area.

Tract Income Level	Percentage of Lending Penetration		
	2015	2016	2017
Low	40.0%	20.0%	33.3%
Moderate	52.9%	52.9%	44.4%
Middle	55.9%	64.7%	70.0%
Upper	54.5%	64.7%	58.3%
Unknown	N/A	63.6%	0.0%
Total	53.7%	58.2%	56.7%

Overall lending gaps are significant. Gaps are highest in low-income tracts; CTB did not penetrate a majority of low-income tracts during the evaluation period. However, CTB penetrated a majority of moderate-income tracts in 2015 and 2016. While the highest penetration rate was in middle-income tracts, low-income tracts and many of the moderate-income tracts have owner-occupancy rates less than 50.0% and rental/vacancy rates greater than 50.0%, which likely impacted CTB’s ability to lend in these areas.

Small Business Lending

CTB made 62 small business loans totaling \$8.1 million in 2017. CTB made one (1.6%) loan in low-income tracts totaling \$305,000 (3.8%), which is substantially below the percentage of businesses in these tracts at 13.0%. The percentage of loans was substantially below the 2017 aggregate of all lenders at 13.4% by volume and 12.0% by dollar amount. Given CTB’s performance compared to proxy and aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is very poor.

CTB made 19 (30.6%) loans in moderate-income tracts totaling \$2.4 million (29.8%), which exceeded the percentage of businesses in these tracts at 19.4%. The percentage of loans substantially exceeded the 2017 aggregate of all lenders at 17.1% by volume and 19.6% by dollar amount. Given CTB’s strong performance compared to proxy and aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is excellent.

CTB made 33 loans in middle-income tracts totaling \$5.0 million. This represents 53.2% of small business loans by volume and 61.5% by dollar amount, compared to the percentage of businesses in these tracts at 49.7%. The 2017 aggregate of all lenders made 49.4% by volume and 53.2% by dollar amount in middle-income tracts.

CTB made nine loans in upper-income tracts totaling \$401,000. This represents 14.5% of small business loans by volume and 4.9% by dollar amount, compared to the percentage of businesses in these tracts at 17.6%. The 2017 aggregate of all lenders made 18.9% by volume and 14.6% by dollar amount in upper-income tracts.

CTB made 50 small business loans totaling \$8.4 million in 2016. CTB made 16 (32.0%) loans in low-income tracts totaling \$2.5 million (29.3%), which is substantially above the percentage of businesses in these tracts at 9.4%. The percentage of loans exceeded the 2016 aggregate of all lenders by volume and dollar amount at 8.4% and 9.2%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is excellent.

CTB made five (10.0%) loans in moderate-income tracts totaling \$1.3 million (22.4%), which was below the percentage of businesses in these tracts at 22.4% by volume and comparable by dollar amount. The percentage of loans was below the 2016 aggregate of all lenders by volume at 21.1% and by dollar amount at 27.4%. Given CTB's performance compared to proxy and aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is adequate.

CTB made 17 loans in middle-income tracts totaling \$3.4 million. This represents 34.0% of small business loans by volume and 40.1% by dollar amount, compared to the percentage of businesses in these tracts at 46.1%. The 2016 aggregate of all lenders made 45.7% by volume and 39.8% by dollar amount in middle-income tracts.

CTB made 12 loans in upper-income tracts totaling \$1.3 million. This represents 24.0% of small business loans by volume and 15.0% by dollar amount, compared to the percentage of businesses in these tracts at 22.1%. The 2016 aggregate of all lenders made 45.7% by volume and 39.8% by dollar amount in upper-income tracts.

CTB made 59 small business loans totaling \$7.4 million in 2015. CTB made 15 (25.4%) loans in low-income tracts totaling \$2.5 million (34.5%), which substantially exceeded the percentage of businesses in these tracts at 9.3%. The percentage of loans substantially exceeded the 2015 aggregate of all lenders at 9.8% and 10.5%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is excellent.

CTB made four (6.8%) loans in moderate-income tracts totaling \$263,000 (3.5%), which was well below the percentage of businesses in these tracts at 22.1%. The percentage of loans was also well below the 2015 aggregate of all lenders at 20.1% and 28.3%, respectively. Given CTB's performance compared to proxy and aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is poor.

CTB made 22 loans in middle-income tracts totaling \$2.5 million. This represents 37.3% of small business loans by volume and 33.7% by dollar amount, compared to the percentage of businesses in these tracts at 46.5%. The 2015 aggregate of all lenders made 42.2% by volume and 39.5% by dollar amount in middle-income tracts.

CTB made 18 loans in upper-income tracts totaling \$2.1 million. This represents 30.5% of small business loans by volume and 28.2% by dollar amount, compared to the percentage of businesses in these tracts at 22.1%. The 2015 aggregate of all lenders made 24.1% by volume and 20.8% by dollar amount in upper-income tracts.

Overall, CTB's performance was slightly below proxy and aggregate of all lenders; therefore, the geographic distribution of small business lending is good.

Home Purchase Lending

CTB made 49 home purchase loans totaling \$6.1 million in 2017. CTB made two (4.1%) home purchase loans totaling \$153,000 (2.5%) in low-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 3.6% by volume and was below proxy by dollar amount. The percentage of loans by volume exceeded the 2017 aggregate of all lenders at 3.8% and was below aggregate at 2.8% by dollar amount. Given CTB's strong performance compared to proxy and aggregate of all lenders by volume, the geographic distribution of home purchase loans in low-income tracts is excellent.

CTB made six (12.2%) home purchase loans totaling \$361,000 (6.0%) in moderate-income tracts, which was well below the percentage of owner-occupied units in these tracts at 16.8% by volume and substantially below by dollar amount. The percentage of loans by volume exceeded the 2017 aggregate of all lenders at 11.0% and was below aggregate at 7.6% by dollar amount. Given CTB's performance compared to proxy and aggregate of all lenders by volume, the geographic distribution of home purchase loans in moderate-income tracts is good.

CTB made 27 home purchase loans totaling \$3.7 million in middle-income tracts. This represents 55.1% of home purchase loans by volume and 61.4% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 59.8% by volume and exceeded proxy by dollar amount. The 2017 aggregate of all lenders made 59.7% by volume and 60.7% by dollar amount in middle-income tracts.

CTB made 14 home purchase loans totaling \$1.8 million in upper-income tracts. This represents 28.6% of home purchase loans by volume and 30.1% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 19.7%. The 2017 aggregate of all lenders made 25.4% by volume and 28.8% by dollar amount in upper-income tracts.

CTB made 41 home purchase loans totaling \$4.9 million in 2016. CTB made no home purchase loans in low-income tracts, which is below the percentage of owner-occupied units in these tracts at 1.8%. The 2016 aggregate only made 0.9% of its home purchase loans by volume and 0.5% by dollar amount in low-income tracts. Given CTB's performance compared to proxy and aggregate of all lenders, the geographic distribution of home purchase loans in low-income tracts is poor.

CTB made six (14.6%) home purchase loans totaling \$621,000 (12.7%) in moderate-income tracts, which is slightly below the percentage of owner-occupied units in these tracts at 16.7%. The percentage of loans by volume and dollar amount exceeded the 2016 aggregate of all lenders at 10.2% and 7.6%, respectively. Given CTB's performance strong performance compared to aggregate of all lenders, the geographic distribution of home purchase loans in moderate-income tracts is excellent. The demand for home purchase loans in moderate-income is likely negatively impacted by the relatively low owner-occupancy rate of 49.7%. This supports that performance is excellent in these tracts.

CTB made 28 home purchase loans totaling \$3.5 million in middle-income tracts. This represents 68.3% of home purchase loans by volume and 71.0% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 60.8%. The 2016 aggregate of all lenders made 62.2% by volume and 61.7% by dollar amount in middle-income tracts.

CTB made seven home purchase loans totaling \$798,000 in upper-income tracts. This represents 17.1% of home purchase loans by volume and 16.3% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 20.7%. The 2016 aggregate of all lenders made 26.7% by volume and 30.2% by dollar amount in upper-income tracts.

CTB made 31 home purchase loans totaling \$5.2 million in 2015. CTB made one (3.2%) home purchase loan totaling \$220,000 (4.2%) in a low-income tract, which substantially exceeded the percentage of owner-occupied units in these tracts at 1.8%. The percentage of loans by volume and dollar amount substantially exceeded the 2015 aggregate of all lenders at 1.4% and 1.0%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of home purchase loans in low-income tracts is excellent.

CTB made nine (29.0%) home purchase loans totaling \$1 million (19.4%) in moderate-income tracts, which substantially exceeded the percentage of owner-occupied units in these tracts at 16.7%. The percentage of loans by volume and dollar amount substantially exceeded the 2015 aggregate of all lenders at 11.3% and 8.0%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of home purchase loans in moderate-income tracts is excellent.

CTB made 12 home purchase loans totaling \$1.6 million in middle-income tracts. This represents 38.7% of home purchase loans by volume and 31.5% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 60.8%. The 2015 aggregate of all lenders made 59.1% by volume and 58.1% by dollar amount in middle-income tracts.

CTB made nine home purchase loans totaling \$2.3 million in upper-income tracts. This represents 29.0% of home purchase loans by volume and 44.9% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 20.7%. The 2015 aggregate of all lenders made 28.2% by volume and 32.9% by dollar amount in upper-income tracts.

Overall CTB's home purchase lending performance varied compared to proxy and aggregate of all lenders; therefore, the geographic distribution of home purchase lending is adequate.

Home Improvement Lending

CTB made 32 home improvement loans totaling \$1.0 million in 2017. CTB made two (6.3%) home improvement loans totaling \$18,000 (1.8%) in low-income tracts, which exceeded the percentage of owner-occupied units in these tracts by volume at 3.6% and was well below by dollar amount. The percentage of loans by volume and dollar amount exceeded the 2017 aggregate of all lenders at 2.8% and 1.5%, respectively. Given CTB's strong performance compared to proxy by volume and aggregate of all lenders, the geographic distribution of home improvement loans in low-income tracts is excellent.

CTB made five (15.6%) home improvement loans totaling \$105,000 (10.4%) in moderate-income tracts, which is slightly below the percentage of owner-occupied units in these tracts at 16.8%. The percentage of loans by volume and dollar amount exceeded the 2017 aggregate of all lenders at 10.7% and 6.6%, respectively. Given CTB's strong performance compared to aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

CTB made 16 home improvement loans totaling \$590,000 in middle-income tracts. This represents 50.0% of home improvement loans by volume and 58.4% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 59.8%. The 2017 aggregate of all lenders made 64.3% by volume and 67.7% by dollar amount in middle-income tracts.

CTB made nine home improvement loans totaling \$297,000 in upper-income tracts. This represents 28.1% of home improvement loans by volume and 29.4% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 19.7%. The 2017 aggregate of all lenders made 21.7% by volume and 23.4% by dollar amount in upper-income tracts.

CTB made 39 home improvement loans totaling \$1.7 million in 2016. CTB made no home improvement loans in low-income tracts. This was below the percentage of owner-occupied units in these tracts at 1.8%. The 2016 aggregate of all lenders made 2.3% of its home improvement loans by volume and 1.5% by dollar volume in low-income tracts. Given CTB's performance compared to proxy and aggregate of all lenders, the geographic distribution of home improvement loans in low-income tracts is very poor.

CTB made eight (20.5%) home improvement loans totaling \$112,000 (6.7%) in moderate-income tracts, which exceeded percentage by volume of owner-occupied units in these tracts at 16.7% and was well below proxy by dollar amount. The percentage of loans by volume exceeded the 2016 aggregate of all lenders at 13.7% and was below aggregate at 9.2% by dollar amount. Given CTB's strong performance compared to proxy and aggregate of all lenders by volume, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

CTB made 20 home improvement loans totaling \$856,000 in middle-income tracts. This represents 51.3% of home improvement loans by volume and 51.0% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 60.8%. The 2016 aggregate of all lenders made 56.5% by volume and 57.3% by dollar amount in middle-income tracts.

CTB made 11 home improvement loans totaling \$709,000 in upper-income tracts. This represents 28.2% of home improvement loans by volume and 42.3% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 20.7%. The 2016 aggregate of all lenders made 27.5% by volume and 31.9% by dollar amount in upper-income tracts.

CTB made 39 home improvement loans totaling \$1.9 million in 2015. CTB made one (2.6%) home improvement loan in a low-income tract totaling \$5,000 (0.3%), which substantially exceeded the percentage of owner-occupied units in these tracts at 1.8% by volume and was well below proxy by dollar amount. The percentage of loans by volume substantially exceeded the 2015 aggregate at 1.4% and was well below aggregate by dollar amount at 0.9%. Given CTB's strong performance compared to proxy and aggregate of all lenders by volume, the geographic distribution of home improvement loans in low-income tracts is excellent.

CTB made 12 (30.8%) home improvement loans totaling \$426,000 (21.7%) in moderate-income tracts, which substantially exceeded the percentage of owner-occupied units in these tracts at 16.7%. The percentage of loans by volume and dollar amount substantially exceeded the 2015 aggregate of all lenders at 12.8% and 15.3%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

CTB made 19 home improvement loans totaling \$1.3 million in middle-income tracts. This represents 48.7% of home improvement loans by volume and 66.0% by dollar amount, compared to the percentage of owner-occupied units at 60.8%. The 2015 aggregate of all lenders made 64.1% by volume and 61.7% by dollar amount in middle-income tracts.

CTB made seven home improvement loans totaling \$236,000 in upper-income tracts. This represents 17.9% of home improvement loans by volume and 12.0% by dollar amount, compared to the percentage of owner-occupied units at 20.7%. The 2015 aggregate of all lenders made 21.5% by volume and 22.0% by dollar amount in upper-income tracts.

Overall CTB home improvement lending performance was strong compared to proxy and aggregate of lenders; therefore, geographic distribution of home improvement lending is excellent. One of the community contacts indicated that many homes are in need of maintenance. CTB was responsive to this need by providing home improvement loans, especially in low- and moderate-income tracts.

Refinance Lending

CTB made 27 refinance loans totaling \$3.6 million in 2017. CTB made two (7.4%) refinance loans totaling \$189,000 (5.1%) in low-income tracts, which substantially exceeded the percentage of owner-occupied units in these tracts at 3.6%. The percentage of loans by volume and dollar amount substantially exceeded the 2017 aggregate at 3.1% and 2.8%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of refinance loans in low-income tracts is excellent.

CTB made one (3.7%) refinance loan totaling \$43,000 (1.2%) in moderate-income tracts, which was well below the percentage of owner-occupied units in these tracts at 16.8%. The percentage

of loans by volume and dollar amount was well below the 2017 aggregate at 9.7% and 7.3%, respectively. Given CTB's performance compared to proxy and aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is very poor.

CTB made 16 refinance loans totaling \$2.5 million in middle-income tracts. This represents 59.3% of refinance loans by volume and 68.6% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 59.8%. The 2017 aggregate of all lenders made 63.4% by volume and 65.2% by dollar amount in middle-income tracts.

CTB made eight (29.6%) refinance loans totaling \$927,000 (25.1%) in upper-income tracts, compared to the percentage of owner-occupied units in these tracts at 19.7%. The 2017 aggregate of all lenders made 23.6% by volume and 24.6% by dollar amount in upper-income tracts.

CTB made 28 refinance loans totaling \$3.1 million in 2016. CTB made no refinance loans in low-income tracts. This was below the percentage of owner-occupied units at 1.8%. The 2016 aggregate made 1.0% refinance loans by volume and 0.5% by dollar volume in low-income tracts. Given CTB's performance compared to proxy and aggregate of all lenders, the geographic distribution of refinance loans in low-income tracts is poor.

CTB made two (7.1%) refinance loan totaling \$555,000 (17.7%) in moderate-income tracts, which was well below the percentage of owner-occupied units by volume in these tracts at 16.7% and exceeded proxy by dollar amount. The percentage of loans by volume was below the 2016 aggregate of all lenders at 9.9% and by dollar amount exceeded aggregate at 7.7%. Given CTB's performance compared to proxy and aggregate of all lenders by volume, the geographic distribution of refinance loans in moderate-income tracts is adequate.

CTB made 22 refinance loans totaling \$2.3 million in middle-income tracts. This represents 78.6% of refinance loans by volume and 74.0% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 60.8%. The 2016 aggregate of all lenders made 61.6% by volume and 61.3% by dollar amount in middle-income tracts.

CTB made four refinance loans totaling \$258,000 in upper-income tracts. This represents 14.3% of refinance loans by volume and 8.2% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 20.7%. The 2016 aggregate of all lenders made 27.5% by volume and 30.5% by dollar amount in upper-income tracts.

CTB made 31 refinance loans totaling \$3.8 million in 2015. CTB made no refinance loans in low-income tracts. This was below the percentage of owner-occupied units in these tracts at 1.8%. The 2015 aggregate made 1.7% of its refinance loans by volume and 1.5% by dollar volume in low-income tracts. Given CTB's performance compared to proxy and aggregate of all lenders, the geographic distribution of refinance loans in low-income tracts is poor.

CTB made two (6.5%) refinance loans totaling \$240,000 (6.4%) in moderate-income tracts, which was well below the percentage of owner-occupied units in these tracts at 16.7%. The percentage of loans by volume and dollar amount was below the 2015 aggregate of all lenders at 9.4% and

7.3%, respectively. Given CTB's performance compared to proxy and aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is adequate.

CTB made 20 refinance loans totaling \$2.3 million in middle-income tracts. This represents 64.5% of refinance loans by volume and 60.2% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 60.8%. The 2015 aggregate of all lenders made 61.9% by volume and 61.9% by dollar amount in middle-income tracts.

CTB made nine refinance loans totaling \$1.3 million in upper-income tracts. This represents 29.0% of refinance loans by volume and 33.4% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 20.7%. The 2015 aggregate of all lenders made 26.9% by volume and 29.2% by dollar amount in upper-income tracts.

Overall CTB's refinance lending performance varied compared to proxy and aggregate of all lenders; therefore, geographic distribution of refinance lending is adequate.

Community Development Loans

CTB originated no community development loans during the evaluation period compared to having 8.7% of total deposits and 7.1% of total loans in this assessment area. While there is significant competition for community development loans and a number of large national banks in this market, CTB ranks sixth out of 19 institutions with 7.1% of the deposit market share. Therefore, CTB makes few, if any community development loans in this assessment area.

Flexible Lending Programs

CTB originated 11 In-House Special Home loans totaling \$1.1 million in assessment area during the evaluation period. Three of these loans were in low- or moderate-income areas and ten were originated to low- or moderate-income borrowers.

CTB provided direct subsidies totaling \$40,000 to eight low- or moderate-income individuals through the FHLB of Cincinnati's Welcome Home down payment assistance program in this assessment area.

CTB originated 18 SBA 7(a) loans totaling \$2.9 million. These loans provide funds to start-ups and existing small businesses with access to capital with more flexible repayment terms than conventional commercial financing for multiple purposes.

CTB makes use of flexible lending practices in serving the credit needs of the Huntington-Ashland assessment area. These programs are designed to improve affordable housing for low- and moderate-income individuals and provide small businesses with access to capital to help existing companies retain and expand their businesses or attract new small businesses to the area. Further, community contacts noted affordable housing as a significant need in this area and also indicated a need for access to capital for small businesses. Therefore, the impact of these programs on low- and moderate-income geographies and to low- and moderate-income borrowers and small businesses enhanced CTB's overall lending test performance.

Investment Test

CTB’s performance relative to the investment test in the Huntington-Ashland MSA is rated “Outstanding.”

CTB obtained 15 new investments totaling approximately \$4.9 million, representing 11.7% of qualified investments by dollar amount. These investments supported affordable housing initiatives through a CRA Qualified Investment Fund that invests in mortgage pools guaranteed by various government mortgage agencies. These investments supported 99 Section 8 eligible rental units and 14 single-family homes for low- and moderate-income families and individuals, including the elderly and disabled. The economic stagnation and higher levels of unemployment and poverty support the critical need for all aspects of affordable housing in this assessment area; therefore, qualified investments exhibit an excellent responsiveness to credit and community development needs across the assessment area.

CTB made a qualified in-kind contribution of donated office space to a local affordable housing agency valued at \$1,200 and 60 small dollar donations totaling \$81,430 representing 5.4% of total dollar volume of donations. This ranks as CTB’s third highest percentage of donations made during the evaluation period.

Purpose of CD Donation	#	\$
Community Services	53	\$71,710
Economic Development	6	\$9,620
Affordable Housing	2	\$1,300
Total	61	\$82,630

Donations primarily support non-profit organizations that provide a multitude of services to low- and moderate-income individuals and families including, but not limited to, food banks, homeless shelters, crime prevention programs for seniors, emergency housing and utility assistance, and free and low-cost medical services. Due to the impact of the opioid crisis, community contacts emphasized the great need for a multitude of social services. Donations also supported a local affordable housing organization, an economic development alliance, and an area development council with a mission to enhance the area’s business climate.

Overall, CTB made 12.2% of its total qualified community development investments and donations in the Huntington-Ashland assessment area, which is greater than the percentage of total deposits at 8.7%, total loans at 7.1%, and total percentage of branch offices at 11.1%. This ranks as CTB’s third highest percentage of qualified community development investment activity. Therefore, CTB made an excellent level of qualified community development investments in the Huntington-Ashland assessment area, particularly those not routinely provided by private investors, often in a leadership position.

Service Test

CTB’s performance relative to the services test in the Huntington-Ashland MSA is rated “High Satisfactory.” Retail services are accessible and CTB is a leader in providing community development services.

Retail Services

CTB has not opened or closed any offices since the previous evaluation in the Huntington-Ashland assessment area; therefore, CTB’s record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies and to low- and moderate-income households. CTB’s delivery services are accessible to CTB’s geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or low- and moderate-income households, and are consistent with the services and hours discussed in the “Institution” assessment.

CTB has eight branch offices with cash-only ATMs and one branch with a stand-alone drive-through cash-only ATM nearby. Eight branches provide drive-through, extended, and weekend hours of service and one branch provides drive-through and weekend hours of service. CTB’s branch offices in this assessment area represent 11.1% of its branch offices.

The following table illustrates the percentage of branch offices in low-, moderate-, middle, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts in 2017 based on 2015 census data. CTB had one branch office in low-, three in moderate-, four in middle-, and one in upper-income census tracts in 2015/2016 based on 2010 census data.

Geographic Distribution of Branches

Analysis Year: 2017

Exam: Community Trust Bank 2019

Huntington Ashland WV KY OH MSA #26580 2017

Tract Income Levels	BRANCHES							DEMOGRAPHICS				
	Total Branches		Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses	
	#	%	#	#	#	#	#	#	%	%	%	
Low	Total	1	11.1%	0	0	1	1	1	6	9.0%	7.2%	13.0%
	DTO	0		0	0	0						
	LS	0		0	0							
Moderate	Total	2	22.2%	0	0	2	2	2	18	26.9%	19.2%	19.4%
	DTO	0		0	0	0						
	LS	0		0	0							
Middle	Total	4	44.4%	0	0	4	3	4	30	44.8%	54.7%	49.7%
	DTO	0		0	0	0						
	LS	0		0	0							
Upper	Total	2	22.2%	0	0	2	2	2	12	17.9%	18.3%	17.6%
	DTO	0		0	0	0						
	LS	0		0	0							
Unknown	Total	0	0.0%	0	0	0	0	0	1	1.5%	0.5%	0.4%
	DTO	0		0	0	0						
	LS	0		0	0							
<i>Totals</i>	Total	9	100.0%	0	0	9	8	9	67	100.0%	100.0%	100.0%
	DTO	0		0	0	0						
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows
*Closed branches are only included in the "Closed" column and are not included in any other total
LP or not included in total.

Branch distribution in low-income tracts is considered excellent. The distribution of branches exceeded that of households and low-income census tracts, and was comparable to the percentage of total businesses in these tracts. Branch distribution in moderate-income tracts is considered adequate. Therefore, the branch distribution in low- and moderate-income tracts is good.

Community Development Services

CTB is a leader in providing community development services in the Huntington-Ashland assessment area. During the evaluation period, 11 employees provided 75 services totaling 675 hours of community development services to 17 different organizations that provide a multitude of services throughout the assessment area. This represents 12.0% of all community development service hours, which is greater than the percentage of total deposits at 8.7% and the percentage of branch offices at 11.1%. In addition, the community development service hours provided in this assessment area equate to 0.34 ANP.¹¹

Community Services			Economic Development			Revitalization & Stabilization		
# Services	# Hours	# Orgs	# Services	# Hours	# Orgs	# Services	# Hours	# Orgs
56	523	12	18	146	4	1	6	1

Employees provided financial expertise through leadership positions in multiple community organizations that offer services to low- and moderate-income individuals and families, promote affordable housing, community and economic development, and area revitalization and stabilization. Community development services include 597 hours serving on boards and committees, 48 hours providing technical expertise, and 30 hours providing financial literacy education.

Community contacts indicated opportunities for financial institutions to provide access to capital to small businesses and workforce development and social services targeted to low- and moderate-income individuals, particularly those impacted by the opioid crisis. The majority of community development services addressed these needs. Employees provided technical expertise, including but not limited to fund raising and financial literacy training to economic development organizations and non-profits, respectively. As a result, these community development services are considered to be responsive to expressed needs in this assessment area.

¹¹ Annualized Persons (ANP): Number CD qualified service hours divided by 2,000 work hours in a year

COMMONWEALTH OF KENTUCKY

CRA RATING for Commonwealth of Kentucky:¹² Outstanding

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: Outstanding

The major factors supporting this rating include:

- A good responsiveness to credit needs;
- A good geographic distribution of loans throughout the assessment area;
- A good distribution of loans among borrowers of different income levels and to businesses of different revenue sizes;
- A good record of serving the credit needs of low-income individuals and areas and very small businesses exhibited;
- A leader in making community development loans;
- Makes use of flexible lending practices in serving the assessment area's credit needs;
- An excellent level of qualified community development investments and grants;
- Often in a leadership position in providing community development investments and grants;
- Retail delivery systems are accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A leader in providing community development services.

SCOPE OF EVALUATION

Full-scope reviews were conducted for Nonmetropolitan Kentucky and the Lexington-Fayette MSA. The time period and products evaluated for these assessment areas are consistent with the scope discussed in the institution section of this report.

Nonmetropolitan Kentucky received greater weight in determining the CRA rating for the state, since it had the largest lending volumes and number of banking centers and ranked first in the institution's share of lending, deposits, and branches during the evaluation period. The Lexington-Fayette assessment area ranked second in CTB's share of lending, deposits, and branches during the evaluation period.

¹² For 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.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COMMONWEALTH OF KENTUCKY

Lending activity accounted for 85.3% of the CTB's total lending activity and deposits accounted for 81.9% of the CTB's total deposits. HMDA-reportable lending in Kentucky represented 85.2% of the CTB's total HMDA lending and CRA-reportable lending represented 82.9% of the CTB's total CRA lending. As of June 30, 2018, CTB ranked seventh among 178 insured institutions and has a deposit market share of 3.5% in Kentucky.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COMMONWEALTH OF KENTUCKY

Lending Test

CTB's performance under the lending test in Kentucky is rated "Outstanding."

Lending Activity

CTB originated 4,306 HMDA loans totaling \$486.5 million and 1,414 small business loans totaling \$166.4 million during the evaluation period in Kentucky.

CTB's lending activity reflects a good responsiveness to the credit needs across its assessment areas in Kentucky taking into consideration economic conditions and competitive factors. Lending activity is good in Nonmetropolitan Kentucky and the Lexington-Fayette MSA. While no substantial concentration of loans was identified in excluded counties within CTB's delineated footprint, a small concentration was identified in Jessamine County in the Lexington-Fayette MSA. In addition to lending, CTB modified existing real-estate secured loans to borrowers and made use of flexible lending practices in Kentucky. Loan modifications were assessed in Nonmetropolitan Kentucky to determine CTB's ability to assist low- and moderate-income homeowners and in low- and moderate-income geographies avoid foreclosures.

Borrower-Income, Business Revenue Size, and Geography

The overall distribution of loans among borrowers of different income levels and to businesses of different sizes in Kentucky is good. HMDA-reportable lending to borrowers of different income levels and to businesses of different sizes is good in Nonmetropolitan Kentucky and the Lexington-Fayette MSA.

The overall geographic distribution of loans reflects a good penetration in Kentucky. The geographic distribution of HMDA-reportable loans is good in Nonmetropolitan Kentucky and excellent in the Lexington-Fayette MSA. The geographic distribution of small business loans is good in Nonmetropolitan Kentucky and the Lexington-Fayette MSA.

Lastly, CTB exhibits a good record of serving the credit needs of low-income individuals and areas and businesses with gross annual revenues of \$1 million or less in Kentucky.

A detailed analysis for the borrower-income distribution and geographic distribution is provided with the analysis for each assessment area.

Community Development Loans

CTB is a leader in making community development loans in Kentucky. The largest concentration of community development loans by state was in Kentucky with \$56.6 million, accounting for 97.4% by dollar volume of bank-wide community development lending. Performance in Nonmetropolitan Kentucky had the greatest impact on community development lending. The majority (87.5%) of CTB's community development lending by dollar volume (\$50.9 million) occurred in Nonmetropolitan Kentucky; therefore, CTB is a leader in making community development loans in Nonmetropolitan Kentucky. CTB makes a relatively high level of community development loans in the Lexington-Fayette MSA with community development lending totaling \$5.8 million and accounting for 9.9% of bank-wide community development lending by dollar volume.

The community development loans originated or renewed during the evaluation period were for a variety of purposes, including the revitalization/stabilization of targeted low- and moderate-income census tracts or other qualified geographies, community services targeted to low- and moderate-income individuals, the promotion of economic development by financing small businesses that resulted in permanent job creation and/or retention, and affordable housing for low- and moderate-income individuals. These loans supported affordable housing, economic development, and services to low- and moderate-income individuals. Community development loans originated in Kentucky resulted in improved outcomes for low- and moderate-income individuals and families and helped to provide needed services or stabilize the economy. Community contacts stressed the critical need for affordable housing, home improvements, and drug treatment and other social services targeted to lower-income individuals and families as a result of the opioid crisis. These loans exhibited an excellent responsiveness to credit needs of lower income individuals and lower income and distressed geographies and very small businesses across CTB's assessment areas in Kentucky.

Lastly, consideration was given to eight qualified community development loans totaling \$41.4 million that benefited counties within Kentucky but outside CTB's delineated assessment areas. These loans supported an affordable housing project (223 units), two SBA 504 loans, and temporary housing and other wrap-around services for low- and moderate-income children (i.e., group home for abused children). In particular CTB originated a community development loan to a Community Development Financial Institution along with a NMTC investment to fund construction of a mixed use commercial/residential property in a low-income area in Louisville, Kentucky to create a commercial kitchen incubator to accommodate up to 50 food entrepreneurs that prepare and distribute food in low-income areas with limited access to healthy food. The project also includes the construction of up to 50 single-family homes. CTB also originated a community development loan along with a LIHTC investment to help a non-profit expand its drug rehabilitation center in a distressed middle-income census tract in Louisville, Kentucky, an area plagued by the opioid epidemic. In addition to providing free treatment for addiction, the center also provides homeless persons access to permanent affordable housing (68 units receiving Section 8 assistance). These community development loans made in combination with qualified

community development investments exhibit excellent responsiveness to credit needs of low-income individuals and areas in Kentucky.

Flexible Lending

Overall, CTB makes use of flexible lending practices within assessment areas located in Kentucky.

CTB originated 34 SBA 7(a) loans totaling \$4.8 million that benefited small businesses in counties within Kentucky but outside CTB's delineated assessment areas. These loans provide funds to start-ups and existing small businesses with access to capital with more flexible repayment terms than conventional commercial financing for multiple purposes.

Investment Test

CTB's performance under the investment test in Kentucky is rated "Outstanding."

CTB holds 80 qualified community development investments totaling \$24.8 million in Kentucky. CTB obtained 60 new investments totaling approximately \$18.8 million, representing 76.0% of qualified investments by dollar amount. From prior periods, CTB holds 20 outstanding investments with a current book value of approximately \$5.9 million, representing 24.0% of qualified investments by dollar amount. The majority (64.2%) of CTB's qualified investments by dollar volume (\$15.9 million) benefitted Nonmetropolitan Kentucky, and 35.8% by dollar volume (\$8.9 million) benefitted the Lexington-Fayette MSA.

Consideration was also given to five qualified community development investments totaling \$6.1 million that support affordable housing initiatives across the Commonwealth of Kentucky with a purpose, mandate, or function that includes serving the geographies or individuals located within CTB's assessment areas. These investments were made through a CRA Qualified Investment Fund that invests in mortgage pools guaranteed by various government mortgage agencies and Kentucky Housing Corporation mortgage revenue bonds.

The majority of qualified investments supported affordable housing initiatives, schools with majority of students eligible for free- and reduced-lunch programs, and business and real estate investment in low-income communities to foster job creation; all needs expressed by community contacts or from the performance context. Therefore, these qualified investments exhibit an excellent responsiveness to credit and community development needs across Kentucky.

Lastly, since CTB was considered responsive to the credit and community development needs; investments that do not support organizations or activities with a purpose, mandate, or function of serving CTB's geographies or individuals located within Kentucky were considered to positively impact state performance. Consideration was given to 54 qualified community development investments totaling \$43.1 million in Kentucky, consisting of 15 qualified community development investments totaling \$27.1 million (62.9%) made during the current review period and 39 prior period investments with a current book value totaling \$16.0 million (37.1%). These investments were primarily LIHTCs supporting at least 859 units of affordable housing throughout Kentucky and municipal school bonds supporting schools with majority of students eligible for

free- and reduced-lunch programs. In particular CTB invested in a NMTC and LIHTC which were made in conjunction with two community development loans. *Refer to Community Development Loans for details.* These qualified community development investments, particularly those made in combination with community development loans exhibit excellent responsiveness to credit needs of low-income individuals and areas in Kentucky.

CTB also made 347 donations in Kentucky totaling \$1.4 million representing 94.1% of total dollar volume of donations made during the evaluation period. Of the donations made in Kentucky 78.2% were made in Nonmetropolitan Kentucky and 21.8% were made in the Lexington-Fayette assessment area. Donations primarily supported non-profit organizations that provide a multitude of services to low- and moderate-income individuals and families. Lastly, consideration was given to six donations totaling \$6,700 that benefitted counties within the state but outside CTB's delineated assessment areas within Kentucky. These donations supported an organization that provides college scholarship assistance to qualified low- and moderate-income high school students, an organization that fosters economic development throughout Kentucky, and a housing partnership that supports a multitude of services to sustain and promote access to affordable housing.

CTB made 73.3% of its total qualified community development investments and donations in Kentucky compared to the percentage of total deposits at 81.9%, total loans at 85.3%, and total percentage of branch offices at 81.5%. Overall, this is an excellent level of qualified community development investments, particularly those not routinely provided by private investors, often in a leadership position.

Additional information regarding performance under the investment test is provided in the respective analyses for each assessment area.

Service Test

CTB's performance under the service test in Kentucky is rated "Outstanding." Retail services are accessible and CTB is a leader in providing community development services.

For details regarding the institution's performance in the individual assessment areas, refer to the respective assessment area's "Service Test" section in this report.

Retail Services

Since the previous evaluation, CTB has not opened or closed any branches in Kentucky; however, CTB consolidated a branch in middle-income tract to a nearby location and closed eight cash-only automated teller machines (ATMs) in Nonmetropolitan Kentucky. Therefore, CTB's record of opening and closing branches has not adversely affected the accessibility of its delivery systems. For this evaluation period, CTB has 66 branches and 69 cash-only ATMs in Kentucky.

Overall retail delivery systems are accessible to CTB's geographies and individuals of different income levels. Of CTB's branches 9.1% serve low- and moderate-income geographies in Kentucky. Delivery systems are readily accessible in Nonmetropolitan Kentucky and accessible in the Lexington-Fayette MSA.

Banking services do not vary or inconvenience any portion of CTB's assessment areas in Kentucky. Banking centers are generally open six days a week and provide lobby services full days Monday through Thursday (8:30 a.m. to 4:00 p.m.) and Friday (9:00 am to 6:00 pm) and half days on Saturday (8:30 a.m. – noon). Fifty-eight CTB's offices in Kentucky offer extended hours until 5:30 pm or 6:00 p.m. during the week and 37 offices have weekend hours.

CTB uses alternative delivery systems to supplement its branch and ATM networks; the website, mobile banking, and telephone banking services are available to all bank customers regardless of location or income.

Community Development Services

CTB is a leader in providing community development services in Kentucky with 81 employees providing 4,643 hours of community development services and supporting 120 different organizations during the evaluation period in Kentucky. CTB is a leader in providing community development services in Nonmetropolitan Kentucky and provides an adequate level in the Lexington-Fayette MSA.

CTB's directors, officers, and staff provided their financial expertise to the community by engaging in activities that promoted or facilitated affordable housing, services for low- and moderate-income individuals, economic development, and revitalization of low- and moderate-income areas. Community development service hours provided in Kentucky equate to 2.32 ANP.

Community contacts indicated the critical need for all aspects of affordable housing and opportunities for financial institutions to provide access to capital to small businesses, workforce development, and social services targeted to low- and moderate-income individuals, particularly those impacted by the opioid crisis. The majority of community development services provided by CTB employees addressed these needs. As a result, community development services are considered to be responsive to available service opportunities in Kentucky.

Because CTB was considered responsive to the credit and community development needs in the state consideration was given to economic development services that benefited a broader statewide or regional area in Kentucky. Two employees gave 29 hours serving as board members for the New Markets Tax Credit Advisory Board and U.S. Department of Agriculture Farm Service Agency. Consideration was also given to multiple community development services that benefitted counties within the state but outside CTB's delineated assessment areas within Kentucky. These services supported economic development, revitalization/stabilization, and community services targeted to low- and moderate-income people and were provided by four employees that gave 195 hours to eight organizations. These community development services resulted in 138 hours serving on boards and committees, 48 hours providing technical expertise, and nine hours providing financial literacy education.

NONMETROPOLITAN AREA
(Full-scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN NONMETROPOLITAN KENTUCKY

Nonmetropolitan Kentucky consists of entireties of Adair, Bell, Boyle, Fleming, Floyd, Franklin, Green, Johnson, Knott, Laurel, Letcher, Madison, Marion, Mercer, Montgomery, Perry, Pike Pulaski, Rockcastle, Russell, Taylor, and Whitley counties. Due to changes in median family income levels resulting from changes in U.S. census data, this assessment area was comprised of the following tracts for this analysis:

Tract Income Level	2015/2016	2017
	Number of Tracts	Number of Tracts
Low	2	2
Moderate	34	33
Middle	104	115
Upper	42	32
Total	182	182

This assessment area lost one moderate-income census tract and one moderate-income census tract and gained 11 middle-income tracts, and lost 10 upper-income census tracts. There were no changes to the number of low-income tracts.

Between 2016 and 2017, 112 middle-income census tracts (97.4%) were designated as distressed due to poverty and/or unemployment and nearly half (48.2%) of distressed middle-income tracts were also designated as remote rural underserved tracts.

County	Number of Distressed Tracts	Number of Underserved Tracts
	Poverty/Unemployment	Remote Rural
Adair County	6	
Bell County	4	
Fleming County	3	
Floyd County	7	7
Green County	4	4
Johnson County	6	6
Knott County	4	4
Laurel County	12	
Letcher County	7	7
Marion County	5	
Montgomery County	5	
Perry County	6	6
Pike County	16	16
Pulaski County	11	
Rockcastle County	3	

Russell County	4	4
Taylor County	5	
Whitley County	4	
Total Tracts	112	54

As of June 30, 2018, CTB ranked first out of 60 institutions with 19.9% of the deposit market share. Whitaker Bank, Inc. and United Bank & Capital Trust Company ranked second and third with 4.3% and 4.0% of the deposit market share, respectively. Deposits in this assessment area accounted for 69.8% of CTB’s total deposits. This was the largest percentage of deposits within CTB’s CRA footprint.

From January 1, 2015 through December 31, 2017 CTB originated 3,580 HMDA-reportable loans and 1,055 CRA-reportable loans, which represents 70.9% and 61.8% of the total loans originated during the evaluation period. These are the largest HMDA and CRA markets for loans originated during the evaluation period.

In 2017, CTB ranked first among 307 HMDA reporters in the assessment area. The next two largest HMDA lenders in the assessment area were Quicken, and U.S. Bank National Association (U.S. Bank) NA. CTB ranked sixth of 81 CRA reporters in the assessment area in 2017. The top five CRA lenders in the assessment area were American Express, U.S. Bank, Capital One Synchrony Bank and Chase Bank USA. These lenders tend to be issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Interviews were conducted with four community contacts to provide additional information regarding the assessment area. The first contact was with a community action partnership which provides a multitude of services targeted toward low- and moderate-income individuals and families in central Kentucky. These programs include adult day care, transportation services, weatherization and home energy assistance, food and shelter, Head Start, health insurance assistance, and senior companionship. According to the contact, automotive plant jobs are available; however, due to an aging workforce, the pool of skilled trade professionals is diminishing. It appears young adult workers are not interested in working in the skilled trades because they are not mechanically inclined. As a result local community colleges and workforce development agencies are starting to offer free vocational classes to try and attract young people to skilled trade professions. Even though the economy is doing well, there are still people in the area working multiple jobs to cover monthly expenses because these jobs frequently do not pay a living wage. The contact stated there is a need for financial institutions to provide financial literacy training to help the unbanked and underbanked obtain some sort of bank accounts and access to credit. The contact believes the area’s financial institutions appear to be committed to help meet the credit needs of lower-income individuals and communities.

The second contact was with a community action agency that provides a variety of programs and assistance designed to fight poverty including Early Head Start, substance abuse and prevention, emergency shelter, workforce development, affordable housing, transitional housing assistance, and home weatherization. The contact explained the Cumberland Valley area has some of the poorest counties in the country; the poverty rate is nearly 1.5 times the national rate. Since 2012 this region has experienced declines in population and median household income primarily due to the large decline of coal industry jobs. Many people have stopped looking for jobs because total

employment in the region has dropped by at least 20.0% in the last decade. The contact stated that lower workforce participation likely has a greater impact on hiring for entry-level and lower-wages jobs than for jobs that require advanced skills and pay more. However, efforts are underway to diversify the region's economy and bring more jobs to the area. For the past several years this region benefitted from several Obama-era federal grants intended to assist areas hit economically by downturns in the coal industry. These grants included workforce development, broadband networks, and supporting entrepreneurship activities. Unfortunately, the monies for workforce development programs have been exhausted. The contact explained that while requests for assistance have not increased, they have not tapered off either. The opioid epidemic has affected the workforce causing higher employee turnover, bringing additional costs to train new employees, and dealing with employee thefts. The majority of counties in this region have some of the highest opioid rates in the nation and a relatively low percentage of people in the workforce. As a result, area businesses have a hard time finding workers who can pass drug screening; however, the contact indicated there are plenty of good workers available in the region (i.e., who can pass a drug test), including former coal miners. Former miners have a variety of skills that transfer well to industries such as manufacturing, transportation, and warehousing. At a recent job fair, there were 1,500 applicants for about 60 jobs and less than 2.0% failed an unannounced drug screening. In regards to housing, the lower-income housing stock is in need of weatherization and other repairs. Section 8 housing has long waiting lists and no openings. The need for rental assistance is increasing, especially for those who get behind in rents while looking for work or learning new job skills. What was nice about the grant programs for miners was that the grants were bridge programs that helped miners pay for wraparound services while receiving vocational training. The contact considers homelessness to be a growing concern in the area; there are a limited number of homeless shelters in the region, especially for families. From a needs perspective, the contact stated that employment and housing are the area's top needs. Opportunities for participation by local financial institutions includes: rental assistance programs for low- and moderate-income individuals, transitional housing for the homeless, and/or housing rehabilitation grants for low- and moderate-income homeowners.

The third contact was with a charitable affordable housing agency that provides and creates safe, decent, affordable housing in partnership with those in need. The agency also provides referrals for those who lack sufficient income to qualify to buy a home and existing homeowners who have experienced financial, health, or job-related setbacks and are struggling to make their monthly mortgage payments. The agency receives many of requests for short-term emergency assistance (i.e., rental assistance, utility assistance, and home repairs). The contact stated this agency does not provide temporary housing, but there is a significant need for temporary and transitional housing; unfortunately, the area only has one homeless shelter with 20 beds. Recent research conducted by this agency finds one in four area homes require rehabilitation and nearly 60.0% of rentals have renters who are cost burdened. The contact stated there is a lack of affordable rentals in the area. In addition, because of the high demand for affordable housing and comparatively low supply, it is typical for individuals to be on Section 8 waiting lists for 16 to 18 months. For the first time in three years, the area's Section 8 Housing Choice Voucher Program has openings on the waiting list. Also, there is a limited supply of buildable lots, because the lots have been purchased by developers who are building higher-end single-family housing units. The average price of house has escalated to over \$165,000. The contact said they are having trouble finding available and low-cost land to build affordable single-family units on, particularly in Berea and

Richmond, Kentucky. The contact stated there are opportunities for banks to provide down-payment assistance. While lower-income individuals can typically afford the monthly costs of homeownership, saving 20.0% for a down payment can be very burdensome.

The fourth contact represents a non-profit organization that aims to eliminate substandard housing locally and worldwide through constructing, rehabilitating, and preserving homes. This non-profit also advocates for fair and just housing policies and provides training and access to resources to help families improve their living conditions. While this organization is mainly focused on building homes, the contact indicated there is high demand in the area for home improvement and repair assistance. The contact stated that unemployment is prevalent and available jobs are mostly entry-level jobs that generally do not promote professional advancement or the chance to earn a higher living wage. One opportunity for improvement for area banks would be to increase and promote the products and services available to assist lower-income individuals attain financial access and become part of the economy.

Population Characteristics

According to 2015 census data, the population in the assessment area was 717,654 of which 1.0% live in low-income tracts and 14.7% live in moderate-income tracts. In addition, 77.8% of the population was 18 years of age or older, the legal age to enter into a contract. Green and Russell county have the largest population age 65 and over at 19.9% and 18.4%, respectively, compared to 14.4% in Kentucky. The larger senior population particularly in Green and Russell counties means this assessment area probably has lower prime-age labor force participation rates. The table below shows the area's estimated population change from 2010 to 2018. During this period, Pike County had the largest decline in population followed by Letcher and Floyd counties, respectively, and Madison County experienced the greatest increase in population.

Population Change					
County	2010 Population	2015 Population	Percent Change 2010-2015	2018 Population	Percent Change 2015-2018
Adair County	18,656	19,298	3.4%	19,215	-0.4%
Bell County	28,691	27,379	-4.6%	26,569	-3.0%
Boyle County	28,432	29,714	4.5%	30,100	1.3%
Fleming County	14,348	14,588	1.7%	14,432	-1.1%
Floyd County	39,451	37,529	-4.9%	35,845	-4.5%
Franklin County	49,285	50,008	1.5%	50,815	1.6%
Green County	11,258	10,970	-2.6%	11,049	0.7%
Johnson County	23,356	23,137	-0.9%	22,386	-3.2%
Knott County	16,346	15,657	-4.2%	15,126	-3.4%
Laurel County	58,849	59,870	1.7%	60,669	1.3%
Letcher County	24,519	23,055	-6.0%	21,899	-5.0%
Madison County	82,916	88,156	6.3%	92,368	4.8%
Marion County	19,820	19,191	-3.2%	19,404	1.1%
Mercer County	21,331	21,370	0.2%	21,774	1.9%
Montgomery County	26,499	27,569	4.0%	28,203	2.3%
Perry County	28,712	27,357	-4.7%	26,092	-4.6%
Pike County	65,024	61,803	-5.0%	58,402	-5.5%
Pulaski County	63,063	63,827	1.2%	64,623	1.2%
Rockcastle County	17,056	16,933	-0.7%	16,750	-1.1%
Russell County	17,565	17,657	0.5%	17,821	0.9%
Taylor County	24,512	25,601	4.4%	25,549	-0.2%
Whitley County	35,637	36,092	1.3%	36,242	0.4%
State of Kentucky	4,339,367	4,422,057	1.9%	4,468,402	1.0%

Source: U.S. Census Bureau- American Fact Finder - 2017 Populations and 2018 Population Estimates

The table below shows the most populous cities in this assessment area. While the overall population in the assessment area has remained fairly stable, the population within the assessment area appears to have moved to the largest municipalities. Berea and Richmond experienced the greatest gains in population. These cities are relatively close and easily accessible to Lexington which may explain the increase in population. Middlesboro experienced the greatest loss in population.

Largest Cities in Assessment Area by Population			
City	County	Population (July 1, 2018)	Population Growth (2000 – 2018)
Richmond (6 th largest city in Kentucky)	Madison County	35,894	29.5%
Frankfort	Franklin County	27,679	-0.3%
Danville	Boyle County	16,804	8.5%
Berea	Madison County	15,787	39.3%
Somerset	Pulaski County	11,486	0.6%
Campbellsville	Taylor County	11,411	9.0%
Middlesboro	Bell County	9,326	-10.0%

Source: Biggest US Cities By Population – Kentucky

Income Characteristics

The 2010 median family income (\$45,497) in the assessment area was lower than Kentucky median family income (\$55,367). As shown below, the assessment area median family income increased in 2017 and 2018, respectively.

Borrower Income Levels
Kentucky State Non-Metro

HUDE Estimated Median Family Income		Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2017	\$47,800	0	-	\$23,899	\$23,900	-	\$38,239	\$38,240	-	\$57,359	\$57,360	-	& above
2018	\$49,400	0	-	\$24,699	\$24,700	-	\$39,519	\$39,520	-	\$59,279	\$59,280	-	& above

The majority of counties in this assessment area are in rural Appalachian Kentucky and had some of the highest poverty rates in the nation ranging from 44.7% in Bell County to 17.0% in Madison County from 2015 through 2017. In addition all of the rural Appalachian counties had poverty rates greater than 20.0% during the three-year period; and Bell, Floyd, Knott, and Letcher counties had poverty rates greater than 30.0%. Boyle, Franklin, Marion, Mercer, and Taylor counties, the only counties not within the Appalachian region, had poverty rates ranging from 13.7% in Franklin County to 23.0% in Taylor County. Except for Taylor County, these counties had poverty rates that fell below the state average during the three-year period. The only rural Appalachian counties with poverty rates below the state average during this time were Madison and Montgomery counties. Area poverty rates shown below illustrate a concerning trend of poverty and economic stagnations among rural residents in Appalachian Kentucky.

Poverty Rates					
County	2015	2016	Percentage Point Change 2015-2016	2017	Percentage Point Change 2016-2017
Adair County	27.2%	26.1%	-1.1	22.5%	-3.6
Bell County	44.7%	38.7%	-6.0	36.7%	-2.0
Boyle County	17.2%	17.1%	-0.1	15.5%	-1.6
Fleming County	20.0%	21.2%	1.2	17.4%	-3.8
Floyd County	29.5%	30.4%	0.9	32.2%	1.8
Franklin County	13.7%	13.7%	0.0	13.7%	0.0
Green County	20.5%	20.4%	-0.1	18.5%	-1.9
Johnson County	25.9%	25.9%	0.0	23.3%	-2.6
Knott County	33.8%	38.2%	4.4	34.6%	-3.6
Laurel County	23.0%	23.2%	0.2	24.3%	1.1
Letcher County	33.2%	31.6%	-1.6	30.8%	-0.8
Madison County	18.2%	21.3%	3.1	17.0%	-4.3
Marion County	20.5%	20.1%	-0.4	14.8%	-5.3
Mercer County	15.1%	14.5%	-0.6	13.4%	-1.1
Montgomery County	21.5%	17.9%	-3.6	17.7%	-0.2
Perry County	28.5%	30.9%	2.4	25.9%	-5.0
Pike County	25.0%	31.4%	6.4	28.8%	-2.6
Pulaski County	23.0%	18.9%	-4.1	23.7%	4.8
Rockcastle County	22.9%	24.2%	1.3	21.3%	-2.9
Russell County	24.6%	25.0%	0.4	23.3%	-1.7
Taylor County	23.0%	21.3%	-1.7	18.2%	-3.1
Whitley County	29.2%	29.3%	0.1	26.5%	-2.8
Kentucky	18.3%	18.2%	-0.1	17.1%	-1.1
U. S.	14.7%	14.0%	-0.7	13.4%	-0.6

Source: U.S. Census Bureau

According to 2015 census data, 18.7% of the 281,344 households in this assessment area are below the poverty level, 2.6% are receiving public assistance, and 13.1% have rent costs greater than 30.0% of their monthly income.

Housing Characteristics

According to the 2015 census data, there are 326,070 housing units and 189,031 families in the assessment area. From an income perspective, 1.0% of the housing units and 0.9% of families are in the assessment area's low-income tracts and 14.9% of the housing units and 14.5% of families are in the assessment area's moderate-income tracts. In addition, 44.8% of the housing units in low-income tracts are owner-occupied, 38.8% are rental, and 16.4% are vacant. In moderate-income tracts 57.3% of the housing units are owner-occupied, 25.5% are rental, and 17.3% are vacant. Therefore, based on the limited number of low-income and moderate-income tracts, families and housing units and the high percentage of rental/vacant units, there appears to be limited credit-related opportunities for CTB to make home purchase loans and provide various aspects of affordable housing in these tracts.

The 2015 census data shows the median age of housing stock was 39 years old and 12.2% of assessment area’s 326,070 housing units are at least 65 years old (built before 1950). Letcher, Fleming, Bell, and Marion counties have the highest percentage of housing units built prior to 1950 at 23.0%, 21.0%, 17.9%, and 17.2%, respectively. This indicates there are opportunities to make home improvement loans, particularly in the aforementioned counties. The median housing value in the assessment area was \$93,545 with an affordability ratio of 38.1. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. As indicated in the table below, overall median housing values increased between 2010 and 2015 with the greatest increase in value occurring in Perry and Whitley counties, respectively. However, during this same time period housing became less affordable across the assessment area most likely because median family income did not keep pace with home price growth. In addition, median gross rents generally increased across the assessment area, particularly in Johnson, Bell and Pike counties, respectively. The table below presents housing characteristics from the census data between 2010 and 2015 in the assessment area and Kentucky.

Housing Costs Change								
County	Median Housing Value		Percent Change	2010 Affordability Ratio	2015 Affordability Ratio	Median Gross Rent		Percent Change
	2010	2015				2010	2015	
Adair County	80,000	82,400	3.0%	37.3	40.5	464	505	8.8%
Bell County	64,500	60,400	-6.4%	38.3	37.2	399	478	19.8%
Boyle County	126,700	132,500	4.6%	32.1	30.0	584	637	9.1%
Fleming County	82,700	86,700	4.8%	37.8	40.9	524	497	-5.2%
Floyd County	66,700	70,600	5.8%	41.8	42.6	494	543	9.9%
Franklin County	138,900	137,500	-1.0%	34.5	34.9	597	687	15.1%
Green County	75,400	74,200	-1.6%	48.5	47.2	511	524	2.5%
Johnson County	71,400	79,200	10.9%	43.2	44.9	435	543	24.8%
Knott County	60,200	57,900	-3.8%	48.9	52.5	419	479	14.3%
Laurel County	96,100	94,400	-1.8%	38.3	38.2	522	579	10.9%
Letcher County	51,500	56,300	9.3%	60.7	53.9	464	531	14.4%
Madison County	141,100	144,800	2.6%	30.0	29.3	550	647	17.6%
Marion County	97,000	98,200	1.2%	38.7	39.5	563	554	-1.6%
Mercer County	129,400	133,600	3.2%	37.1	31.5	542	580	7.0%
Montgomery County	98,100	114,000	16.2%	36.7	34.5	561	646	15.2%
Perry County	55,900	71,200	27.4%	52.9	45.9	471	535	13.6%
Pike County	64,700	70,400	8.8%	50.3	47.1	515	616	19.6%
Pulaski County	95,500	106,800	11.8%	34.3	32.6	513	598	16.6%
Rockcastle County	72,300	73,900	2.2%	37.3	42.7	464	522	12.5%
Russell County	81,400	88,000	8.1%	36.8	34.9	487	508	4.3%
Taylor County	96,600	93,700	-3.0%	36.6	35.6	511	578	13.1%
Whitley County	64,400	77,900	21.0%	43.7	39.8	532	573	7.7%
Kentucky	116,800	123,200	5.5%	35.6	35.5	601	675	12.3%

Source: U.S. Census Bureau

According to 2015 census data, 27.0% of renters in the assessment area have rent costs more than \$700 a month and nearly 41.9% of units for rent (87,756) have renters who are considered to be cost burdened or have rent costs greater than 30.0% of their monthly income. Increasing rental costs may make it more difficult for potential first-time homebuyers to save enough to make a sufficient down payment in the rising interest rate environment.

Building permits are a leading indicator of future activity in the construction sector. As indicated in the table below,¹³ across the assessment area building permits decreased between 2016 and 2017 and increased between 2017 and 2018 particularly in Madison County (the most populous county in the assessment area).

Building Permits					
County	2016	2017	Percent Change 2016-2017	2018	Percent Change 2017-2018
Adair County	7	2	-71.4%	0	-100.0%
Bell County	26	28	7.7%	34	21.4%
Boyle County	30	31	3.3%	32	3.2%
Floyd County	2	2	0.0%	5	150.0%
Franklin County	52	65	25.0%	73	12.3%
Johnson County	3	0	-100.0%	2	-
Laurel County	3	6	100.0%	4	-33.3%
Madison County	192	171	-10.9%	205	19.9%
Marion County	11	11	0.0%	13	18.2%
Mercer County	34	46	35.3%	45	-2.2%
Montgomery County	45	76	68.9%	85	11.8%
Perry County	6	0	-100.0%	0	-
Pike County	7	6	-14.3%	5	-16.7%
Pulaski County	28	31	10.7%	34	9.7%
Russell County	4	11	175.0%	6	-45.5%
Taylor County	10	5	-50.0%	5	0.0%
Whitley County	5	8	60.0%	9	12.5%
Kentucky	12,714	12,630	-0.7%	13,826	9.5%
U. S.	1,206,642	1,281,977	6.2%	1,328,827	3.7%

Source: U.S. Bureau of Labor Statistics

The overall increase in the number of permits could indicate an increasing demand for home purchase loans during this evaluation period. However, a community contact mentioned there is a limited supply of buildable lots for single-family homes in Madison County, because the lots have been purchased by developers who are building higher-end housing units.

According to RealtyTrac,¹⁴ foreclosure rates in Kentucky are lower than the national average, and in this assessment area only Frankfort, Kentucky (Franklin County) was listed in the top ten city foreclosures in the state. Kentucky ranked 26th for foreclosure filings by state in September 2017.¹⁵

¹³ Only counties with building permit activities are listed

¹⁴ RealtyTrac: <https://www.realtytrac.com/mapsearch/kentucky-foreclosures.html>

¹⁵ Bankrate: <https://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

Labor, Employment, and Economic Characteristics

As indicated in *The Opioid Epidemic and Its Effects: A Perspective on What We Know from the Federal Reserve Bank of Cleveland*,¹⁶ recent Federal Reserve Bank of Cleveland research suggests that counties that have higher levels of opioid prescriptions have substantially lower prime-age labor force participation rates and reduced labor market activity, which ultimately impacts economic growth potential of a local area. In addition, the Centers of Disease Control and Prevention identified 220 counties in 26 states¹⁷ as vulnerable to high rates of certain types of infections as a result of the opioid epidemic.¹⁸ Fifteen of these counties are in this assessment area: Perry, Bell, Floyd, Whitley, Knott, Pike, Rockcastle, Letcher, Johnson, Russell, Laurel, Taylor, Adair, Green, and Mercer, respectively. As a result, these counties are particularly susceptible to reduced labor market activity and stunted economic growth potential.

The opioid crisis has become a primary area of concern for Kentucky's chamber of commerce. The chamber announced in June 2019 an opioid response for business workforce initiative, to be led by a task force of business and industry representatives to focus on destigmatizing the addiction epidemic and supporting employers' role in opioid prevention, treatment, and recovery in the workplace. According to the chamber's opioid abuse report, Kentucky's drug overdose rate was fourth highest among the states in 2017 and in addition to the devastating impact of opioid abuse on Kentuckians, the criminal justice system and the state's efforts to build and sustain a quality workforce also experience the negative effects. The executive director of the chamber's workforce center stated, the opioid crisis is making the challenges of finding and retaining workers even greater for Kentucky's businesses.¹⁹

The majority of counties in this assessment area are located in the rural Appalachian region of Kentucky. Employment has traditionally relied on mining and manufacturing but tourism is steadily gaining in popularity due to the scenic landscapes and forests. Historically, Appalachia has battled poverty, unemployment, stagnant industry, and lower educational attainment and wages. While progress has been made to narrow those gaps, significant divisions remain between Appalachia and the rest of the nation. According to ARC,²⁰ rural Appalachian counties in this assessment area are still experiencing economic stagnation and higher levels of unemployment and poverty, particularly in Bell, Floyd, Knott, and Letcher counties; while Madison County appears to be making some gains in its economic status.

¹⁶Cleveland Fed: <https://www.clevelandfed.org/newsroom-and-events/publications/community-development-briefs/db-20180531-the-opioid-epidemic.aspx>

¹⁷ Of 220 vulnerable counties; 54 are in Kentucky

¹⁸ amfAR – Kentucky Opioid Epidemic: <https://opioid.amfar.org/KY>

¹⁹“Kentucky's Opioid Crisis is the Focus of New Kentucky Chamber Workforce Initiative.” <https://kychamberbottomline.com/2019/06/24/kentuckys-opioid-crisis-is-the-focus-of-new-kentucky-chamber-workforce-initiative/>

²⁰ Appalachian Regional Commission (ARC) – County Economic Status, FY 2017: https://www.arc.gov/reports/region_report.asp?FIPS=21999&REPORT_ID=62

County Economic Status in the Appalachian Region, FY 2017	
Area	Economic Status
Adair County	Distressed
Bell County	Distressed
Fleming County	At-Risk
Floyd County	Distressed
Green County	At-Risk
Johnson County	Distressed
Knott County	Distressed
Laurel County	At-Risk
Letcher County	Distressed
Madison County	Transitional
Montgomery County	At-Risk
Perry County	Distressed
Pike County	At-Risk
Pulaski County	At-Risk
Rockcastle County	Distressed
Russell County	Distressed
Whitley County	Distressed

Source: Appalachian Regional Commission

According to Dun & Bradstreet, the majority of businesses (89.7%) in the assessment area have revenue under \$1 million. There are approximately 359,379 paid employees in this assessment area who are working in either the private sector or government according to Kentucky Regional Economic Analysis Project (KY-REAP).²¹ By percentage of employees, the largest job category in the assessment area is retail trade, followed by manufacturing, local/state government, accommodation and food services, and administrative and waste management. While not a major employment sector across the assessment area, farming is a major industry for Adair, Fleming, Green, Marion, and Mercer counties.

The table below illustrates the average unemployment rates related to this assessment area.

²¹ KY-REAP: https://kentucky.reaproject.org/analysis/industry-structure/industries_by_region/employment/

Unemployment Rates
Assessment Area: Nonmetropolitan Kentucky

Area	Years - Annualized	
	2017	2018
Adair County	6.1	5.1
Bell County	7.9	6.3
Boyle County	5.1	4.4
Fleming County	6.1	5.4
Floyd County	8.4	6.6
Franklin County	4.1	3.7
Green County	4.7	4.3
Johnson County	8.7	6.9
Knott County	8.6	6.9
Laurel County	5.9	5.1
Letcher County	9.4	6.5
Madison County	4.3	3.9
Marion County	4.2	3.8
Mercer County	4.9	4.5
Montgomery County	6.7	6.0
Perry County	8.3	6.3
Pike County	7.8	5.9
Pulaski County	5.7	5.1
Rockcastle County	5.9	4.9
Russell County	7.2	5.8
Taylor County	4.4	4.3
Whitley County	5.8	5.0
Kentucky	4.9	4.3
National	4.4	3.9

Not Seasonally Adjusted

Data extracted on October 3, 2019

While unemployment rates across the assessment area declined between 2017 and 2018, assessment area unemployment rates were generally higher than the national and state unemployment rates. Knott and Johnson counties had the highest unemployment rates during the evaluation period. A community contact mentioned the low percentage of people in the workforce (more so in region of Kentucky that includes Rockcastle County) is due to the opioid epidemic and loss of jobs in the coal industry.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
NONMETROPOLITAN KENTUCKY**

Lending Test

CTB’s performance under the lending test in this assessment area is excellent. CTB’s lending activity demonstrates a good responsiveness to the credit needs of the community. CTB is a leader in making community development loans. CTB originated 50 community development loans totaling \$50.9 million. CTB has a good distribution among borrowers of different income levels and to businesses of different revenue sizes and a good geographic distribution of loans and a limited level of lending gaps. In addition, CTB makes use of flexible lending practices in this assessment area. CTB exhibits an excellent record of serving the credit needs of highly economically disadvantaged areas in its assessment area and a good record of serving the credit needs of low-income individuals and very small businesses with gross annual revenues of \$1 million or less.

Borrower and geographic distribution received equal weight based on the percentage of families by family income compared to the percentage of low- and moderate-income geographies in this assessment area. Greatest consideration was given to the evaluation of home purchase lending based on the overall volume of loans followed by home improvement, small business, and refinance lending. Details of CTB’s residential mortgage and small business lending and information regarding peer lending is in Appendices D, E and F.

Lending Activity

Lending levels reflect a good responsiveness to the credit needs in the assessment area. The percentage of CTB’s lending in the Nonmetropolitan Kentucky is 69.3% while the percentage of total deposits is greater at 69.8%. CTB originated 3,580 HMDA loans and 1,055 CRA loans and had a limited level of lending gaps in this assessment area during the evaluation period.

CTB made 64 loan modifications in this assessment area. The following tables show the percentage by volume and by dollar amount of the loan modifications made during the evaluation period and the distribution by census tract income and by borrower income.

CTB made no loan modifications in low-income tracts. CTB made nine (14.1%) loan modifications by volume totaling \$478,965 (10.4%) by dollar amount in moderate-income tracts which was slightly below the percentage of owner-occupied units.

	Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts		
	% - #	\$ - %	O/O % (2016)	% - #	\$ - %	O/O % (2016)	% - #	\$ - %	O/O % (2016)	% - #	\$ - %	O/O % (2016)
Total Modifications	0.0%	0.0%	0.4%	14.1%	10.4%	17.3%	71.9%	68.3%	57.9%	14.1%	21.3%	24.4%

Therefore, loan modifications enhanced CTB’s ability to reach moderate-income geographies in Nonmetropolitan Kentucky.

CTB made 24 (37.5%) loan modifications by volume totaling \$1.3 million (27.7%) by dollar amount to low-income borrowers which exceeded the percentage of low-income families. CTB made 21 (32.8%) loan modifications by volume totaling \$1.6 million (34.7%) to moderate-income borrowers which exceeded the percentage of moderate-income families.

	Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers		
	% - #	\$ - %	% of Families (2016)	% - #	\$ - %	% of Families (2016)	% - #	\$ - %	% of Families (2016)	% - #	\$ - %	% of Families (2016)
Total Modifications	37.5%	27.7%	23.6%	32.8%	34.7%	16.4%	21.9%	25.9%	18.3%	7.8%	11.7%	41.7%

Therefore, modifications enhanced CTB’s ability to reach low- and moderate-income borrowers in Nonmetropolitan Kentucky.

Distribution by Borrower Income and Revenue Size of the Business

CTB’s overall distribution among borrowers of different income levels and businesses of different sizes is good. Borrower distribution is good for home purchase, refinance, and small business lending and excellent for home improvement lending.

Home Purchase Lending

CTB made 568 home purchase loans totaling \$80.7 million in 2017. Also, CTB originated 38 (6.7%) home purchase loans totaling \$6.9 million (8.7%) made to borrowers with unknown income designations compared to aggregate of all lenders that made 21.0% by volume and 20.4% by dollar amount to borrowers.

In 2017 CTB made 26 (4.6%) home purchase loans totaling \$1.3 million (1.6%) to low-income borrowers, which was substantially below the percentage of families at 24.5% by loan volume and dollar amount. However, the percentage of loans by volume exceeded the 2017 aggregate at 3.4% and by dollar amount at 1.5%. While CTB’s performance was poor compared to proxy, given CTB’s strong performance compared to aggregate of all lenders, the borrower distribution of home purchase loans to low-income borrowers is good.

CTB made 65 (11.4%) home purchase loans totaling \$5.5 million (6.9%) to moderate-income borrowers, which was below the percentage of families at 16.2% by loan volume and by dollar amount. However, the percentage of loans by volume was below the 2017 aggregate at 14.4% and by dollar amount at 9.6%. Given CTB’s performance compared to proxy and aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is good.

CTB made 114 home purchase loans totaling \$11.2 million to middle-income borrowers. This represents 20.1% of home purchase loans by volume and 14.0% by dollar amount, compared to the percentage of families at 18.2%. The 2017 aggregate of all lenders made 22.5% by volume and 19.7% by dollar amount to middle-income borrowers.

CTB made 325 home purchase loans totaling \$55.5 million to upper-income borrowers. This represents 57.2% of home purchase loans by volume and 68.8% by dollar amount, compared to

the percentage of families at 41.1%. The 2017 aggregate of all lenders made 38.7% by volume and 48.8% by dollar amount to upper-income borrowers.

CTB made 496 home purchase loans totaling \$69.8 million in 2016. Also, there were 46 (9.3%) home purchase loans totaling \$4.7 million (6.7%) made to borrowers with unknown income designations compared to aggregate of all lenders that made 20.1% by volume and 19.5% by dollar amount.

In 2016 CTB made 23 (4.6%) home purchase loans totaling \$1.4 million (2.0%) to low-income borrowers, which was substantially below the percentage of families at 23.6% by loan volume and dollar amount. However, the percentage of loans by volume exceeded the 2016 aggregate at 4.0% and by dollar amount at 1.8%. While CTB's performance was poor compared to proxy, given CTB's strong performance compared to aggregate of all lenders, the borrower distribution of home purchase loans to low-income borrowers is good.

CTB made 62 (12.5%) home purchase loans totaling \$4.7 million (6.8%) to moderate-income borrowers, which was slightly below the percentage of families at 16.4% by loan volume and well below by dollar amount. However, the percentage of loans by volume was comparable to the 2016 aggregate at 15.0% and below by dollar amount at 9.7%. Given CTB's performance compared to proxy and aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is good.

CTB made 92 home purchase loans totaling \$8.6 million to middle-income borrowers. This represents 18.5% of home purchase loans by volume and 12.4% by dollar amount, compared to the percentage of families at 18.3%. The 2016 aggregate of all lenders made 21.0% by volume and 17.8% by dollar amount to middle-income borrowers.

CTB made 273 home purchase loans totaling \$50.3 million to upper-income borrowers. This represents 55.0% of home purchase loans by volume and 72.1% by dollar amount, compared to the percentage of families at 41.7%. The 2016 aggregate of all lenders made 39.9% by volume and 51.2% by dollar amount to upper-income borrowers.

CTB made 418 home purchase loans totaling \$54.8 million in 2015. Also, there were 30 (7.2%) home purchase loans totaling \$4.9 million (8.8%) made to borrowers with unknown income designations compared to aggregate of all lenders that made 20.9% by volume and 20.8% by dollar amount to borrowers.

In 2015 CTB made 24 (5.7%) home purchase loans totaling \$1.3 million (2.3%) to low-income borrowers, which was substantially below the percentage of families at 23.6% by loan volume and dollar amount, respectively. However, the percentage of loans substantially exceeded the 2015 aggregate by volume at 4.3% and by dollar amount at 2.0%. While CTB's performance was poor compared to proxy, given CTB's strong performance compared to aggregate of all lenders, the borrower distribution of home purchase loans to low-income borrowers is good.

CTB made 68 (16.3%) home purchase loans totaling \$4.1 million (7.6%) to moderate-income borrowers, which was slightly below the percentage of families at 16.4% by loan volume and well

below by dollar amount. However, the percentage of loans by volume was comparable to the 2015 aggregate at 16.3% and below by dollar amount at 10.5%. Given CTB's performance compared to proxy and aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is good.

CTB made 90 home purchase loans totaling \$8.0 million to middle-income borrowers. This represents 21.5% of home purchase loans by volume and 14.7% by dollar amount, compared to the percentage of families at 18.3%. The 2015 aggregate made 21.9% by volume and 18.9% by dollar amount to middle-income borrowers.

CTB made 206 home purchase loans totaling \$36.5 million to upper-income borrowers. This represents 49.3% of home purchase loans by volume and 66.5% by dollar amount, compared to the percentage of families at 41.7%. The 2015 aggregate made 36.7% by volume and 47.9% by dollar amount to upper-income borrowers.

Overall CTB's home purchase performance was slightly below the percentage of families and mostly exceeded aggregate of all lenders; therefore, borrower distribution of home purchase lending is good.

Home Improvement Lending

CTB made 348 home improvement loans totaling \$13.9 million in 2017. Also, there were five (1.4%) home improvement loans totaling \$500,000 (3.6%) made to borrowers with unknown incomes designations compared to aggregate of all lenders that made 4.5% by volume and 8.4% by dollar amount.

In 2017 CTB made 32 (9.2%) home improvement loans totaling \$463,000 (3.3%) to low-income borrowers, which was well below the percentage of families at 24.5%. However, the percentage of loans by volume exceeded the 2017 aggregate of all lenders at 8.5% and was comparable by dollar amount at 3.6%. While CTB's performance was poor compared to proxy, given CTB's performance compared to aggregate of all lenders, the borrower distribution of home improvement loans to low-income borrowers is adequate.

CTB made 71 (20.4%) home improvement loans totaling \$1.7 million (12.5%) to moderate-income borrowers, which exceeded the percentage of families at 16.2% by volume and was below by dollar amount. However, the percentage of loans by volume and dollar amount exceeded the 2017 aggregate at 17.1% and at 8.8%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

CTB made 89 home improvement loans totaling \$2.6 million to middle-income borrowers. This represents 25.6% of home improvement loans by volume and 19.1% by dollar amount, compared to the percentage of families at 18.2%. The 2017 aggregate of all lenders made 23.0% by volume and 16.5% by dollar amount to middle-income borrowers.

CTB made 151 home improvement loans totaling \$8.5 million to upper-income borrowers. This represents 43.4% of home improvement loans by volume and 61.4% by dollar amount, compared to the percentage of families at 41.1%. The 2017 aggregate of all lenders made 46.8% by volume and 62.6% by dollar amount to upper-income borrowers.

CTB made 397 home improvement loans totaling \$15.6 million in 2016. Also, there were six (1.5%) home improvement loans totaling \$404,000 (2.6%) made to borrowers with unknown income designations compared to aggregate of all lenders that made 4.1% by volume and 5.5% by dollar amount.

In 2016 CTB made 56 (14.1%) home improvement loans totaling \$589,000 (3.8%) to low-income borrowers, which was below the percentage of families at 23.6% by loan volume and dollar amount. However, the percentage of loans by volume and dollar amount exceeded the 2016 aggregate at 9.5% and 2.6%, respectively. Given CTB's adequate performance compared to proxy and strong performance compared to aggregate of all lenders, the borrower distribution of home improvement loans to low-income borrowers is excellent. The high poverty rates likely limit the ability of low-income borrowers to easily access loans. This level of origination supports that performance is excellent to these borrowers.

CTB made 89 (22.4%) home improvement loans totaling \$1.9 million (12.5%) to moderate-income borrowers, which exceeded the percentage of families at 16.4% by loan volume and was slightly below by dollar amount. The percentage of loans by volume and dollar amount exceeded the 2016 aggregate at 19.6% and 9.9%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

CTB made 93 home improvement loans totaling \$3.3 million to middle-income borrowers. This represents 23.4% of home improvement loans by volume and 20.9% by dollar amount compared to the percentage of families at 18.3%. The 2016 aggregate of all lenders made 21.4% by volume and 18.7% by dollar amount to middle-income borrowers.

CTB made 153 home improvement loans totaling \$9.4 million to upper-income borrowers. This represents 38.5% of home improvement loans by volume and 60.3% by dollar amount, compared to the percentage of families at 41.7%. The 2016 aggregate of all lenders made 45.4% by volume and 63.3% by dollar amount to upper-income borrowers.

CTB made 421 home improvement loans totaling \$13.9 million in 2015. Also, there were five (1.2%) home improvement loans totaling \$195,000 (1.4%) made to borrowers with unknown incomes designations compared to aggregate of all lenders that made 3.9% by volume and 5.1% by dollar amount.

In 2015 CTB made 58 (13.8%) home improvement loans totaling \$732,000 (5.3%) to low-income borrowers, which was below the percentage of families at 23.6% by loan volume and substantially below by dollar amount. However, the percentage of loans by volume and dollar amount substantially exceeded the 2015 aggregate of all lenders at 9.1% and 2.4%, respectively. Given

CTB's performance compared to proxy and aggregate of all lenders, the borrower distribution of home improvement loans to low-income borrowers is good.

CTB made 89 (21.1%) home improvement loans totaling \$1.5 million (10.7%) to moderate-income borrowers, which exceeded the percentage of families at 16.4% by volume and was below the dollar amount. However, the percentage of loans by volume and dollar amount exceeded the 2015 aggregate at 19.4% and 10.3%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

CTB made 106 home improvement loans totaling \$3.3 million to middle-income borrowers. This represents 25.2% of home improvement loans by volume and 23.9% by dollar volume compared to the percentage of families at 18.3%. The 2015 aggregate of all lenders made 23.1% by volume and 18.5% by dollar amount to middle-income borrowers.

CTB made 163 home improvement loans totaling \$8.2 million to upper-income borrowers. This represents 38.7% of home improvement loans by volume and 58.7% by dollar amount compared to the percentage of families at 41.7% by volume and exceeded the percentage of families by dollar amount. The 2015 aggregate of all lenders made 44.5% by volume and 63.7% by dollar amount to upper-income borrowers.

Overall CTB's home improvement performance was comparable to the percentage of families and exceeded aggregate of all lenders; therefore, borrower distribution of home improvement lending is excellent. A community contact from an area affordable housing agency indicated that individuals often struggle to fund home improvements. CTB was able to effectively provide home improvement loans to borrowers, especially low- and moderate-income borrowers.

Refinance Lending

CTB made 277 refinance loans totaling \$37.9 million in 2017. Also, there were five (1.8%) refinance loans totaling \$1.7 million (4.4%) made to borrowers with unknown income designations compared to aggregate of all lenders that made 18.9% by volume and 21.9% by dollar amount.

In 2017 CTB made 11 (4.0%) refinance loans totaling \$822,000 (2.2%) to low-income borrowers, which was substantially below the percentage of families at 24.5% by loan volume and dollar amount. However, the percentage of loans by volume was slightly below the 2017 aggregate at 4.4% and exceeded by dollar amount at 2.0%. While CTB's performance was poor compared to proxy, given CTB's performance compared to aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is adequate.

CTB made 33 (11.9%) refinance loans totaling \$2.4 million (6.4%) to moderate-income borrowers, which was below the percentage of families at 16.2% by loan volume and dollar amount. However, the percentage of loans by volume exceeded the 2017 aggregate at 11.4% and was slightly below dollar amount at 7.1%. Given CTB's performance compared to proxy and aggregate of all lenders, the borrower distribution of refinance loans to moderate-income borrowers is good.

CTB made 60 refinance loans totaling \$6.1 million to middle-income borrowers. This represents 21.7% of refinance loans by volume and 16.0% by dollar amount, compared to the percentage of families at 18.2%. The 2017 aggregate of all lenders made 17.6% by volume and 13.6% by dollar amount to middle-income borrowers.

CTB made 168 refinance loans totaling \$26.9 million to upper-income borrowers. This represents 60.6% of refinance loans by volume and 71.1% by dollar amount, compared to the percentage of families at 41.1%. The 2017 aggregate of all lenders made 47.7% by volume and 55.5% dollar volume to upper-income borrowers.

CTB made 337 refinance loans totaling \$46.8 million in 2016. Also, there were nine (2.7%) refinance loans totaling \$5.1 million (11.0%) made to borrowers with unknown income designations compared to aggregate of all lenders that made 23.0% by volume and 26.4% by dollar amount.

In 2016 CTB made 17 (5.0%) refinance loans totaling \$1.1 million (2.3%) to low-income borrowers, which was substantially below the percentage of families at 23.6%. However, the percentage of loans by volume and dollar amount substantially exceeded the 2016 aggregate of all lenders at 3.6% and 1.8%, respectively. While CTB's performance was very poor compared to proxy, given CTB's strong performance compared to aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is good.

CTB made 47 (13.9%) refinance loans totaling \$3.2 million (6.9%) to moderate-income borrowers, which was below the percentage of families at 16.4% by loan volume and dollar amount. However, the percentage of loans by volume and dollar amount substantially exceeded the 2016 aggregate of all lenders at 10.7% and 6.3%, respectively. Given CTB's performance compared to proxy and aggregate of all lenders, the borrower distribution of refinance loans to moderate-income borrowers is good.

CTB made 66 refinance loans totaling \$6.8 million to middle-income borrowers. This represents 19.6% of refinance loans by volume and 14.6% by dollar amount, compared to the percentage of families at 18.3%. The 2016 aggregate of all lenders made 16.1% by volume and 12.0% by dollar amount to middle-income borrowers.

CTB made 198 refinance loans totaling \$30.6 million to upper-income borrowers. This represents 58.8% of refinance loans by volume and 65.3% by dollar amount, compared to the percentage of families at 41.7%. The 2016 aggregate of all lenders made 46.6% by volume and 53.4% by dollar amount to upper-income borrowers.

CTB made 299 refinance loans totaling \$39.2 million in 2015. Also, there were seven (2.3%) refinance loans totaling \$2.1 million (5.5%) made to borrowers with unknown income designations compared to the aggregate of all lenders that made 20.6% by volume and 22.7% by dollar amount.

In 2015 CTB made 11 (3.7%) refinance loans totaling \$423,000 (1.1%) to low-income borrowers, which was substantially below the percentage of families at 23.6% by loan volume and dollar amount. However, the percentage of loans by volume was slightly below the 2015 aggregate of

all lenders at 4.1% and by dollar amount and below the aggregate by dollar amount at 2.0% While CTB's performance was very poor compared to proxy, given CTB's similar performance compared to aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is adequate.

CTB made 37 (12.4%) refinance loans totaling \$2.9 million (7.3%) to moderate-income borrowers, which was slightly below the percentage of families at 16.4% by loan volume and dollar amount. However, the percentage of loans by volume and dollar amount exceeded the 2015 aggregate at 11.3% and 7.0%, respectively. Given CTB's performance compared to proxy and strong performance compared to aggregate of all lenders, the borrower distribution of refinance loans to moderate-income borrowers is good.

CTB made 63 refinance loans totaling \$6.3 million to middle-income borrowers. This represents 21.1% of refinance loans by volume and 16.2% by dollar amount, compared to the percentage of families at 18.3%. The 2015 aggregate of all lenders made 18.6% by volume and 14.8% by dollar amount to middle-income borrowers.

CTB made 181 refinance loans totaling \$27.4 million to upper-income borrowers. This represents 60.5% of refinance loans by volume and 70.0% by dollar amount, compared to the percentage of families at 41.7%. The 2015 aggregate of all lenders made 45.4% by volume and 53.5% by dollar amount to upper-income borrowers.

Overall CTB's refinance lending performance varied compared to the percentage of families and mostly exceeded aggregate of all lenders; therefore, borrower distribution of refinance lending is good.

Small Business Lending

CTB made 332 small business loans totaling \$34.1 million to businesses of different sizes in 2017, and 205 (61.7%) of these loans totaling \$20.5 million (60.2%) were made to businesses with revenues of \$1 million or less. While this is below the percentage of small businesses in the assessment area at 89.7%, the percentage of loans by volume and dollar amount substantially exceeded the 2017 aggregate of all lenders at 48.0% and 44.6%, respectively. Therefore, the distribution of small business loans to businesses of different sizes is good considering CTB's performance relative to the aggregate of all lenders.

In 2017 CTB made a good percentage of small dollar loans (75.3%) in amounts of \$100,000 or less compared to 94.5% of small dollar loans made by aggregate of all lenders. This basically indicates CTB's willingness to lend in smaller amounts which tend to represent amounts typically requested by small businesses.

CTB made 368 small business loans totaling \$41.4 million to businesses of different sizes in 2016; and 238 (64.7%) of these loans totaling \$25.5 million (60.9%) were made to businesses with revenues of \$1 million or less. While this is below the percentage of small businesses in the assessment area at 90.7%, the percentage of loans by volume and dollar amount substantially exceeded the 2016 aggregate of all lenders at 46.6% and 42.2%, respectively. Therefore, the

distribution of small business loans to businesses of different sizes is good considering CTB’s performance relative to the aggregate of all lenders.

In 2016 CTB made a good percentage of small dollar loans (71.2%) in amounts of \$100,000 or less compared to 94.4% of small dollar loans made by aggregate of all lenders. This basically indicates CTB’s willingness to lend in smaller amounts which tend to represent amounts typically requested by small businesses.

CTB made 355 small business loans totaling \$35.5 million to businesses of different sizes in 2015, and 219 (61.7%) of these loans totaling \$19.6 million (55.2%) were made to businesses with revenues of \$1 million or less. While this is below the percentage of small businesses in the assessment area at 92.3%, the percentage of loans by volume and dollar amount substantially exceeded the 2015 aggregate of all lenders at 46.2% and 44.6%, respectively Therefore, the distribution of small business loans to businesses of different sizes is good considering CTB’s performance relative to the aggregate of all lenders.

In 2015 CTB made a good percentage of small dollar loans (73.5%) in amounts of \$100,000 or less compared to 95.3% of small dollar loans made by aggregate of all lenders. This basically indicates CTB’s willingness to lend in smaller amounts which tend to represent amounts typically requested by small businesses.

Overall CTB’s small business lending performance was below the percentage of small businesses and substantially exceeded the aggregate of all lenders by volume and dollar amount. Also, CTB displayed a consistent willingness to make small dollar loans. Therefore, borrower distribution of small business lending is good.

Geographic Distribution of Loans

CTB’s overall distribution of lending among geographies is good. Performance was good for all of the loan categories reviewed. The following gaps in lending were noted in the assessment area.

Tract Income Level	Percentage of Lending Penetration		
	2015	2016	2017
Low	50.0%	50.0%	100.0%
Moderate	97.1%	100.0%	97.0%
Middle	96.2%	99.0%	97.4%
Upper	90.5%	95.2%	100.0%
Total	94.5%	97.8%	97.8%

Overall lending gaps are limited. CTB was able to make one or more loans in all of the low-income tracts and moderate-income tracts in the evaluation period and was able to penetrate a majority of all geographies in the assessment area in the evaluation period. Also, the high penetration rate in middle-income tracts is noteworthy since a majority of these tracts are considered to be distressed and/or underserved. Lastly, there are only two low-income tracts which have owner-occupancy rates less than 50.0% and rental/vacancy rates over 50.0%. Moderate-income tracts have owner-

occupancy rates less than 58.0% and rental/vacancy rates around 43.0%. These factors likely impacted CTB's ability to lend in these areas.

From an income perspective, 1.0% of the housing units and 0.9% of families are in the assessment area's low-income tracts and 14.9% of the housing units and 14.5% of families are in the assessment area's moderate-income tracts. In addition, 44.8% of the housing units in low-income tracts are owner-occupied, 38.8% are rental, and 16.4% are vacant. In moderate-income tracts 57.3% of the housing units in moderate-income tracts are owner-occupied, 25.5% are rental, and 17.3% are vacant. Therefore, based on the limited number of low-income and moderate-income tracts, families and housing units and the high percentage of rental/vacant units, there appears to be limited credit-related opportunities for CTB to make home purchase loans and provide various aspects of affordable housing in these tracts.

Home Purchase Lending

CTB made 568 home purchase loans totaling \$80.7 million in 2017. CTB made two (0.4%) home purchase loans in low-income tracts totaling \$78,000 (0.1%), which was well below the percentage of owner-occupied units at 0.8%. The percentage of loans by volume was the same as the 2017 aggregate of all lenders at 0.4% and well below by dollar amount at 2.8%. Given CTB's performance compared to proxy and aggregate, the geographic distribution of home purchase loans in low-income tracts is adequate.

CTB made 73 (12.9%) home purchase loans in moderate-income tracts totaling \$7.6 million (9.4%), which was the same as the percentage of owner-occupied units at 12.9% by volume and below the proxy by dollar amount. The percentage of loans by volume and dollar amount exceeded 2017 aggregate of all lenders at 8.7% and 7.0%, respectively. Given CTB's performance compared to proxy and strong performance compared to the aggregate of all lenders, the geographic distribution of home purchase loans in moderate-income tracts is excellent.

CTB made 384 home purchase loans totaling \$53.4 million in middle-income tracts. This represents 67.6% of home purchase loans by volume and 66.1% by dollar amount, compared the percentage of owner-occupied units at 66.1%. The 2017 aggregate of all lenders made 58.9% by volume and 54.4% by dollar amount in middle-income tracts.

CTB made 109 home purchase loans totaling \$19.7 million in upper-income tracts. This represents 19.2% of home purchase loans by volume and 24.4% by dollar amount, compared to the percentage of owner-occupied units at 24.4%. The 2017 aggregate of all lenders made 31.9% by volume and 38.4% by dollar amount in upper-income tracts.

CTB made 496 home purchase loans totaling \$69.8 million in 2016. CTB made no home purchase loans in low-income tracts, which was substantially below the percentage of owner-occupied units at 0.4%. The 2016 aggregate of all lenders made 0.1% of its home purchase loans by volume and 0.1% by dollar amount in low-income tracts. Given CTB's performance compared to proxy and aggregate of all lenders, the geographic distribution of home purchase loans in low-income tracts is poor.

CTB made 68 (13.7%) home purchase loans totaling \$8.0 million (11.5%) in moderate-income tracts, which was slightly below the percentage of owner-occupied units at 17.3% by volume and below the proxy by dollar amount. The percentage of loans by volume and dollar amount substantially exceeded the 2016 aggregate of all lenders at 10.0% and 8.1%, respectively. Given CTB performance compared to proxy and strong performance compared to aggregate of all lenders, the geographic distribution of home purchase loans in moderate-income tracts is excellent. The demand for home purchase loans in moderate-income is likely negatively impacted by the relatively lower owner-occupancy rate. This supports that performance is excellent in these tracts.

CTB made 308 home purchase loans totaling \$40.6 million in middle-income tracts. This represents 62.1% of home purchase loans by volume and 58.1% by dollar amount, compared to the percentage of owner-occupied units at 57.9%. The 2016 aggregate of all lenders made 52.1% by volume and 48.0% by dollar amount in middle-income tracts.

CTB made 120 home purchase loans totaling \$21.2 million in upper-income tracts. This represents 24.2% of home purchase loans by volume and 30.4% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 24.4%. The 2016 aggregate of all lenders made 37.6% by volume and 43.7% by dollar amount in upper-income tracts.

CTB made 418 home purchase loans totaling \$54.9 million in 2015. CTB made no home purchase loans in low-income tracts, which is below the percentage of owner-occupied units in these tracts at 0.4%. The 2015 aggregate of all lenders made 0.2% of its home purchase loans by volume and 0.1% by dollar volume in low-income tracts. Given CTB's performance compared to proxy and aggregate of all lenders, the geographic distribution of home purchase loans in low-income tracts is poor.

CTB made 67 (16.0%) home purchase loans totaling \$7.4 million (13.6%) in moderate-income tracts, which was slightly below the percentage of owner-occupied units at 17.3%. The percentage of loans by volume and dollar amount substantially exceeded the 2015 aggregate of all lenders at 10.6% and 8.6%, respectively. Given CTB's performance compared to proxy and strong performance compared to the aggregate of all lenders, the geographic distribution of home purchase loans in moderate-income tracts is excellent. The demand for home purchase loans in moderate-income is likely negatively impacted by the relatively lower owner-occupancy rate. This supports that performance is excellent in these tracts.

CTB made 246 home purchase loans totaling \$30.2 million in middle-income tracts. This represents 58.9% of home purchase loans by volume and 54.9% by dollar amount, compared to the percentage of owner-occupied units at 57.9%. The 2015 aggregate of all lenders made 54.6% by volume and 49.7% by dollar amount in middle-income tracts.

CTB made 105 home purchase loans totaling \$17.3 million in upper-income tracts. This represents 25.1% of home purchase loans by volume and 31.5% by dollar volume, compared to the percentage of owner-occupied units at 24.4%. The 2015 aggregate of all lenders made 34.4% by volume and 41.6% by dollar volume in upper-income tracts.

Overall CTB home purchase lending performance varied compared to proxy and mostly exceeded the aggregate of all lenders; therefore, geographic distribution of residential lending is good.

Home Improvement Lending

CTB made 348 home improvement loans totaling \$13.9 million in 2017. CTB made two (0.6%) home improvement loans totaling \$28,000 (0.2%) in low-income tracts, which was below the percentage of owner-occupied units at 0.8% by volume and well below by dollar amount. The percentage of loans by volume was below the 2017 aggregate of all lenders at 1.0% and substantially below the aggregate at 0.9% by dollar amount. Given CTB's performance compared to proxy and aggregate, the geographic distribution of home improvement loans in low-income tracts is adequate.

CTB made 64 (18.4%) home improvement loans totaling \$2.1 million (15.3%) in moderate-income tracts, which exceeded the percentage of owner-occupied units at 14.5%. The percentage of loans by volume and dollar amount also substantially exceeded the 2017 aggregate of all lenders at 13.2% and 10.3%, respectively. Given CTB's strong performance compared to proxy and aggregate, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

CTB made 256 home improvement loans totaling \$10.0 million in middle-income tracts. This represents 73.6% of home improvement loans by volume and 72.0% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 64.6%. The 2017 aggregate of all lenders made 63.2% by volume and 55.2% by dollar amount in middle-income tracts.

CTB made 26 home improvement loans totaling \$1.8 million in upper-income tracts. This represents 7.5% of home improvement loans by volume and 12.6% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 20.2%. The 2017 aggregate of all lenders made 22.3% by volume and 33.5% by dollar amount in upper-income tracts.

CTB made 397 home improvement loans totaling \$15.6 million in 2016. CTB made one (0.3%) home improvement loan totaling \$5,000 (<0.1%) in low-income tracts, which was the same as the percentage of owner-occupied units in these tracts at 0.3% by volume and substantially below proxy by dollar amount. The percentage of loans by volume was the same as the 2016 aggregate of all lenders at 0.3% and substantially below the aggregate at 0.1% by dollar volume. Given CTB's performance by volume compared to proxy and aggregate, the geographic distribution of home improvement loans in low-income tracts is adequate.

CTB made 116 (29.2%) home improvement loans totaling \$4.2 million (27.1%) in moderate-income tracts, which substantially exceeded the percentage of owner-occupied units in these tracts at 17.3%. The percentage of loans by volume and dollar amount substantially exceeded the 2016 aggregate of all lenders at 19.4% and 16.3%, respectively. Given CTB's strong performance compared to the proxy and aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

CTB made 237 home improvement loans totaling \$8.2 million in middle-income tracts. This represents 59.7% of home improvement loans by volume and 52.6% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 57.9%. The 2016 aggregate of all lenders made 59.2% by volume and 53.9% by dollar amount in middle-income tracts.

CTB made 43 home improvement loans totaling \$3.2 million in upper-income tracts. This represents 10.8% of home improvement loans by volume and 20.2% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 24.4%. The 2016 aggregate of all lenders made 21.1% by volume and 29.6% by dollar amount in upper-income tracts.

CTB made 421 home improvement loans totaling \$13.9 million in 2015. CTB made two (0.5%) home improvement loans totaling \$73,000 (0.5%) in low-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 0.4%. The percentage of loans by volume and dollar amount also exceeded the 2015 aggregate at 0.2% and 0.2%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of home improvement loans in low-income tracts is excellent.

CTB made 96 (22.8%) home improvement loans totaling \$2.6 million (18.9%) in moderate-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 17.3%. The percentage of loans by volume and dollar amount also exceeded the 2015 aggregate of all lenders at 17.3% and 13.4%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

CTB made 275 home improvement loans totaling \$1.4 million in middle-income tracts. This represents 65.3% of home improvement loans by volume and 70.8% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 57.9%. The 2015 aggregate of all lenders made 61.6% by volume and 59.3% by dollar amount in middle-income tracts.

CTB made 48 home improvement loans totaling \$1.4 million in upper-income tracts. This represents 11.4% of home improvement loans by volume and 9.8% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 24.4%. The 2015 aggregate of all lenders made 20.8% by volume and 27.1% by dollar amount in upper-income tracts.

While CTB's home improvement lending performance varied compared to proxy and the aggregate of all lenders, several community contacts stressed the need for a multitude of home improvement-type loans, particularly for older housing stock typically located in low- and moderate-income geographies; therefore, the geographic distribution of home improvement lending is good.

Refinance Lending

CTB made 277 refinance loans totaling \$37.9 million in 2017. CTB made two (0.7%) refinance loans in low-income tracts totaling \$170,000 (0.4%), which is below the percentage of owner-occupied units in these tracts at 0.8% by volume and below the proxy by dollar amount. The percentage of loans by volume substantially exceeded the 2017 aggregate of all lenders at 0.4% and was the same as the aggregate by dollar volume at 0.4%. Given CTB's performance compared to proxy and strong performance compared to aggregate of all lenders, the geographic distribution of refinance loans in low-income tracts is good.

CTB made 39 (14.1%) refinance loans in moderate-income tracts totaling \$5.1 million (13.3%), which is comparable to the percentage of owner-occupied units in these tracts was at 14.5%. The

percentage of loans by volume and dollar amount substantially exceeded the 2017 aggregate of all lenders at 8.5% and 8.5%, respectively. Given CTB's performance compared to proxy and strong performance compared to aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is excellent.

CTB made 199 (71.8%) refinance loans totaling \$26.3 million (69.5%) in middle-income tracts. This represents 71.8% of refinance loans by volume and 69.5% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 64.6%. The 2017 aggregate of all lenders made 58.0% by volume and 53.0% by dollar amount in middle-income tracts.

CTB made 37 refinance loans totaling \$6.3 million in upper-income tracts. This represents 13.4% of refinance loans by volume and 16.7% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 20.2%. The percentage of loans by volume and dollar amount substantially exceeded the 2017 aggregate of all lenders at 33.1% and 37.9%, respectively.

CTB made 337 refinance loans totaling \$46.8 million in 2016. CTB made no refinance loans in low-income tracts, which is substantially below the percentage of owner-occupied units in these tracts at 0.4%. The 2016 aggregate made 0.1% of its refinance loans by volume and 0.1% by dollar amount in low-income tracts. Given CTB's performance compared to the proxy and aggregate of all lenders and proxy, the geographic distribution of refinance loans in low-income tracts is poor.

CTB made 55 (16.3%) refinance loan totaling \$6.7 million (14.2%) in moderate-income tracts, which is slightly below the percentage of owner-occupied units in these tracts by at 17.3%. The percentage of loans substantially exceeded the 2016 aggregate of all lenders by volume and dollar amount at 10.0% and 8.1%, respectively. Given CTB's performance compared to proxy and strong performance compared to aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is excellent.

CTB made 220 refinance loans totaling \$29.5 million in middle-income tracts. This represents 65.3% of refinance loans by volume and 63.1% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 57.9%. The 2016 aggregate of all lenders made 50.7% by volume and 47.7% by dollar amount in middle-income tracts.

CTB made 62 refinance estate mortgage loans totaling \$10.6 million in upper-income tracts. This represents 18.4% of refinance loans by volume and 22.7% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 24.4%. The 2016 aggregate of all lenders by volume made 39.0% volume and 43.9% by dollar amount in upper-income tracts.

CTB made 299 refinance loans totaling \$39.2 million in 2015. CTB made no refinance loans, which is below the percentage of owner-occupied units in these tracts at 0.4%. The 2015 aggregate made 0.2% of its refinance loans by volume and 0.1% by dollar amount in low-income tracts. Given CTB's performance compared to the proxy and aggregate of all lenders, the geographic distribution of refinance loans in low-income tracts is poor.

CTB made 53 (17.7%) refinance loans totaling \$6.4 million (16.3%), which exceeded the percentage of owner-occupied units in these tracts by volume at 17.3% and was slightly below by dollar amount. The percentage of loans substantially exceeded the 2015 aggregate of all lenders

by volume and dollar amount at 9.9% and 8.1%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is excellent.

CTB made 196 refinance loans totaling \$25.0 million in middle-income tracts. This represents 65.6% of refinance loans by volume and 63.6% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 57.9%. The 2015 aggregate of all lenders made 50.8% by volume and 47.1% by dollar amount in middle-income tracts.

CTB made 50 refinance estate mortgage loans totaling \$7.8 million in upper-income tracts. This represents 16.7% of refinance loans by volume and 20.0% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 24.4%. The 2015 aggregate of all lenders made 39.0% by volume and 44.6% by dollar amount in upper-income tracts.

Overall CTB's refinance lending performance varied compared to proxy and generally exceeded the aggregate of all lenders; therefore, geographic distribution of refinance lending is good.

Small Business Lending

CTB made 332 small business loans totaling \$34.1 million in 2017. CTB made no loans in low-income tracts, which was below the percentage of businesses in these tracts at 0.5%. The 2017 aggregate of all lenders made 0.4% of its loans by volume and 0.4% by dollar amount in low-income tracts. Given CTB's performance compared to proxy and the aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is poor.

CTB made 29 (8.7%) loans in moderate-income tracts totaling \$3.6 million (10.7%), which was slightly below the percentage of businesses in these tracts at 11.5%. The percentage of loans was slightly below the 2017 aggregate of all lenders by volume at 10.0% and exceeded the aggregate by dollar amount at 10.0%. Given CTB's performance compared to proxy and aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is good.

CTB made 239 loans in middle-income tracts totaling \$25.4 million. This represents 72.0% of small business loans by volume and 74.6% by dollar amount, compared to the percentage of businesses in these tracts at 66.8%. The 2017 aggregate of all lenders made 63.8% by volume and 63.0% by dollar amount in middle-income tracts.

CTB made 64 loans in upper-income tracts totaling \$4.9 million. This represents 19.3% of small business loans by volume and 14.7% by dollar amount, compared to the percentage of businesses in these tracts at 21.2%. The 2017 aggregate of all lenders made 24.0% by volume and 25.5% by dollar amount in upper-income tracts.

CTB made 368 small business loans totaling \$41.4 million in 2016. CTB made no loans in low-income tracts, which was below the percentage of businesses in these tracts at 0.7%. The 2016 aggregate of all lenders made 0.4% of its loans by volume and 0.2% by dollar amount in low-income tracts. Given CTB's performance compared to proxy and the aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is poor.

CTB made 54 (14.7%) loans in moderate-income tracts totaling \$5.1 million (12.2%), which exceeded the percentage of businesses in these tracts at 11.3%. The percentage of loans exceeded the 2016 aggregate of all lenders by volume at 11.3% and exceeded the aggregate by dollar amount at 11.2%. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is excellent.

CTB made 223 loans in middle-income tracts totaling \$25.7 million. This represents 60.6% of small business loans by volume and 62.0% by dollar amount, compared to the percentage of businesses in these tracts at 62.1%. The 2016 aggregate of all lenders made 58.7% by volume and 57.2% by dollar amount in middle-income tracts.

CTB made 91 loans in upper-income tracts totaling \$10.7 million. This represents 24.7% of small business loans by volume and 25.7% by dollar amount, compared to the percentage of businesses in these tracts at 25.9%. The 2016 aggregate of all lenders made 28.5% by volume and 30.8% by dollar amount in upper-income tracts.

CTB made 355 small business loans totaling \$35.5 million in 2015. CTB made no loans in low-income tracts, which was substantially below the percentage of businesses in these tracts at 0.7%. The 2015 aggregate of all lenders made 0.4% of its loans by volume and 0.2% by dollar amount. Given CTB's performance compared to proxy and the aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is poor.

CTB made 53 (14.9%) loans in moderate-income tracts totaling \$4.7 million (13.2%), which substantially exceeded the percentage of businesses in these tracts by volume and dollar amount at 11.4%. The percentage of loans substantially exceeded the 2015 aggregate of all lenders by volume and dollar amount at 11.6% and 10.3%, respectively. Given CTB's strong performance compared to proxy and the aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is excellent.

CTB made 216 loans in middle-income tracts totaling \$23.1 million. This represents 60.8% of small business loans by volume and 65.1% by dollar amount, compared to the percentage of businesses in these tracts at 61.8%. The 2015 aggregate of all lenders made 57.8% by volume and 60.1% by dollar amount in middle-income tracts.

CTB made 86 loans in upper-income tracts totaling \$7.7 million. This represents 24.2% of small business loans by volume and 21.7% by dollar amount, compared to the percentage of businesses in these tracts at 26.1%. The 2015 aggregate of all lenders made 26.9% by volume and 26.8% by dollar amount in upper-income tracts.

Overall, CTB's performance was comparable to proxy and generally exceeded the aggregate of all lenders; therefore, the geographic distribution of small business lending is good.

Community Development Loans

CTB originated or renewed 49 community development loans totaling approximately \$50.9 million during the evaluation period, as shown in the table below.

Purpose of CD Loan	#	\$
Revitalization & Stabilization	35	\$32,668,029
Community Services	6	\$14,655,000
Economic Development	3	\$2,958,803
Affordable Housing	5	\$585,240
Total	49	\$50,867,072

Community development lending represents 86.0% of CTB’s total community development loans by volume and 87.4% by dollar amount compared to 69.8% of total deposits and 69.3% of total loans in this assessment area. This ranks as CTB’s highest percentage of community development lending during the evaluation period. CTB’s performance is responsive in this market considering CTB ranks first out of 60 institutions with 19.9% of the deposit market share. Therefore, CTB is a leader in making community development loans in Nonmetropolitan Kentucky.

The community development loans were made for a variety of purposes:

- To purchase land to construct affordable housing for low- and moderate-income individuals;
- To provide construction financing for 15 single family homes by a builder of affordable housing for low- and moderate individuals; to provide financing to three small businesses to help retain or create permanent jobs;
 - A construction loan provided financing to build a new hotel in a distressed middle-income area and helped to create 20 new jobs for low- and moderate-income individuals; this loan was made in conjunction with a \$1.4 million NMTC.
 - Working capital loans helped two small businesses retain 10 jobs with the goal of adding 40 new jobs for low- and moderate-income individuals.
- To help finance the cost of implementing a new information technology system following a major cyberattack for a regional healthcare facility located in a distressed middle-income area which serves majority low- and moderate-income patients;
- To provide working capital to several non-profits that provide a multitude of wrap around services for low- and moderate-income children and adults (e.g., neglected children, victims of domestic violence, home repairs provided through a settlement school, and transitional housing and drug rehabilitation counseling for young adults aging out of the child welfare system);
- To purchase fire trucks or utility vehicles for eight volunteer fire departments serving distressed middle-income communities;
- To help fund repairs to infrastructure in a distressed middle-income community;
- To help fund operating expenses for medical university that provides permanent job opportunities in a distressed middle-income community and free medical services to those in need;
- To provide working capital to two local hospitals serving distressed middle-income communities to help retain 591 permanent jobs with the goal of adding 556 new permanent jobs; and,
- To provide working capital to a community drug treatment center located in a moderate-income community that primarily serves low- and moderate-income people.

These loans resulted in improved outcomes for low- and moderate-income individuals and families and helped to provide needed services or stabilize the economy. Community contacts stressed the critical need for affordable housing, home improvements, and drug treatment and other social services targeted to lower-income individuals and families as a result of the opioid crisis. Therefore, the community development loans made in Nonmetropolitan Kentucky exhibit an excellent responsiveness to credit needs of lower income individuals and lower income and distressed geographies and very small businesses.

Flexible Lending Programs

CTB provided direct subsidies totaling \$272,150 to 46 low- or moderate-income individuals through the FHLB of Cincinnati’s Welcome Home down payment assistance program in this assessment area.

CTB partnered with an affordable housing agency to make four small loans totaling \$199,924 to low- or moderate-income individuals to build safe and affordable homes.

CTB originated 85 SBA 7(a) loans totaling \$13.6 million. These loans provide funds to start-ups and existing small businesses with access to capital with more flexible repayment terms than conventional commercial financing for multiple purposes.

CTB makes use of flexible lending practices in serving the credit needs of the Nonmetropolitan Kentucky. These programs are designed to improve affordable housing for low- and moderate-income individuals and provide small businesses with access to capital to help existing companies retain and expand their businesses or attract new small businesses to the area. Further, community contacts noted affordable housing as a significant need in this area. Therefore, the impact of these programs on low- and moderate-income geographies and to low- and moderate-income borrowers and small businesses enhanced CTB’s overall lending test performance.

Investment Test

CTB made 32 qualified community development investments totaling \$15.9 million in this evaluation period. CTB obtained 12 investments (62.7%) during this evaluation period totaling approximately \$10.0 million. From prior periods, CTB holds 20 investments (37.3%) with a current book value of approximately \$5.9 million. The following table reflects the total number of qualified community development investments by purpose, number, and dollar amount.

Purpose of CD Investment	#	\$
Affordable Housing	12	\$7,441,337
Community Services	17	\$4,720,325
Revitalization/Stabilization	2	\$2,375,965
Economic Development	1	\$1,365,000
Total	32	\$15,902,627

Of the 12 new qualified community development investments, ten investments supported affordable housing facilitated through a CRA Qualified Investment Fund and a LIHTC, and two investments supported businesses in low-income communities and fostered job creation. The

investment fund supported 217 Section 8 eligible rental units and six single-family homes for low- and moderate-income families and individuals, including the elderly and disabled. The tax credit supported a project to renovate a 39-unit apartment building into affordable housing for low- and moderate-income single parent households and develop a dedicated community building which provides on-site resident services including day care, other wraparound supportive services, and effective coping and parenting education classes. The first NMTC helped fund the construction of a new hotel in a distressed middle income community and create 15 permanent new jobs for low- and moderate-income persons; in conjunction with this investment, CTB also funded a \$2.7 million construction loan. The remaining NMTC provided construction financing to expand a local university campus in a distressed middle income community and helped to create 38 permanent new jobs for low- and moderate-income persons. The 20 qualified prior period community development investments primarily supported two affordable housing projects (38 low- and moderate-income housing units), construction of a community theater in a distressed middle-income geography, construction a new residence hall for a college with a majority of low- to moderate-income student body, and municipal school bonds which provided needed capital to schools with majority of student bodies eligible for schools' free- and reduced-lunch programs. Community contacts stressed the critical need for all aspects of affordable housing and workforce development initiatives for lower-skilled workers that pay a livable wage. Therefore, qualified investments exhibit an excellent responsiveness to credit and community development needs across the assessment area.

CTB also made 276 donations totaling \$1.1 million, representing 73.6% of total dollar volume of donations. This ranks as CTB's highest percentage of donations made during this evaluation period. Donations in Nonmetropolitan Kentucky supported a wide array of organizations and non-profits to fund outreach activities, affordable housing, educational programs, and initiatives aimed at responding to community needs, improving the financial stability of individuals and families, and revitalizing underserved communities. Also, CTB made qualified in-kind contributions of donated office space to a local affordable housing agency and economic development organization valued at \$6,720. Community contacts stressed the critical need for affordable housing, home improvements, and drug treatment and wraparound social services targeted to lower-income individuals and families as a result of the opioid crisis. These donations exhibit an excellent responsiveness to credit and community development needs across the assessment area. The following table reflects the total number community development donations by purpose, number, and dollar amount.

Purpose of CD Donation	#	\$
Community Services	209	\$569,358
Revitalization/Stabilization	51	\$510,376
Economic Development	5	\$16,260
Affordable Housing	11	\$14,460
Total	276	\$1,110,454

Overall, CTB made 38.6% of its total qualified community development investments and donations in Nonmetropolitan Kentucky compared to the percentage of total deposits at 69.8%, total loans at 69.3%, and the total percentage of branch offices at 67.9%. This is CTB's highest

percentage of qualified community development investment activity. Therefore, CTB has an excellent level of qualified community development investments in Nonmetropolitan Kentucky, particularly those not routinely provided by private investors, often in a leadership position.

Service Test

Retail services are readily accessible and CTB is a leader in providing community development services.

Retail Services

CTB has not opened or closed any offices since the previous evaluation; therefore, CTB's record of opening and closing offices has not adversely affected the accessibility of its delivery systems, in low- or moderate-income geographies and to low- and moderate-income households. In June 2015 CTB consolidated a branch in Hazard, Kentucky into a nearby location in a middle-income tract. CTB's delivery services are readily accessible to CTB's geographies and individuals of different income levels in its assessment area.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including moderate-income geographies or to low- and moderate-income households, and are consistent with the services and hours discussed in the "Institution" assessment.

CTB has 55 branch offices in Nonmetropolitan Kentucky. There are 45 branches with cash-only ATMs and ten branches without ATMs. Nine branches are in moderate-, 37 in middle-, and nine in upper-income tracts. Fifty branches provide drive-through services, 48 branches provide extended hours, and 29 provide weekend hours of service. CTB also has 11 stand-alone cash-only ATMs and one drive-through only with a cash-only ATM. CTB's branch offices in this assessment area represent 67.9% of its branch offices. In 2017 CTB closed seven grocery store stand-alone cash-only ATMs²² and one in a regional medical center in Winchester, Kentucky.

The following table illustrates the percentage of branch offices in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts in 2017 based on 2015 census data. CTB had one branch office in low-, nine in moderate-, 33 in middle-, and 12 in upper-income census tracts in 2015/2016 based on 2010 census data.

²² Cities with closed grocery store ATMs: Louisa, Middlesboro, Paintsville, Pikeville (2), Prestonsburg, and South Williams, Kentucky

Geographic Distribution of Branches

Analysis Year: 2017

Exam: Community Trust Bank 2019

Non Metropolitan Kentucky 2017

Tract Income Levels	BRANCHES							DEMOGRAPHICS				
	Total Branches		Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses	
	#	%	#	#	#	#	#	#	%	%	%	
Low	Total	0	0.0%	0	0	0	0	0				
	DTO	0		0	0	0			2	1.1%	1.0%	0.5%
	LS	0		0	0							
Moderate	Total	9	16.4%	0	0	9	9	4				
	DTO	0		0	0	0			33	18.1%	14.4%	11.5%
	LS	0		0	0							
Middle	Total	37	67.2%	1	1	33	30	17				
	DTO	0		0	0	0			115	63.2%	65.1%	66.8%
	LS	0		0	0							
Upper	Total	9	16.4%	0	0	8	9	8				
	DTO	0		0	0	0			32	17.6%	19.5%	21.2%
	LS	0		0	0							
Unknown	Total	0	0.0%	0	0	0	0	0				
	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
<i>Totals</i>	Total	55	100.0%	1	1	50	48	29				
	DTO	0		0	0	0			182	100.0%	100.0%	100.0%
	LS	0		0	0							

DTO - Drive Thru Only

LS - Limited Service

Shaded rows indicate totals; unshaded rows are a subset of shaded rows

*Closed branches are only included in the "Closed" column and are not included in any other totals

LPOs not included in totals.

The distribution of branches was below the percentage of low-income census tracts but exceeded the percentage of households and total businesses in these tracts in 2015/2016. The distribution of branches exceeded the percentage of moderate-income census tracts, households, and total businesses in these tracts. Therefore, branch distribution in low- and moderate-income tracts is excellent.

Community Development Services

CTB is a leader in providing community development services in this assessment area. During the evaluation period, 67 employees provided 503 services totaling 4,380 hours community development services to 100 different organizations that provide a multitude of services throughout the assessment area. This represents 79.0% of all community development service hours, which is greater than the percentage of total deposits at 69.8% and the percentage of branch offices at 67.9%. In addition, the community development service hours provided in this assessment area equate to 2.19 ANP.

Community Services	Economic Development	Revitalization & Stabilization	Affordable Housing
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# Services	# Hours	# Orgs	# Services	# Hours	# Orgs	# Services	# Hours	# Orgs	# Services	# Hours	# Orgs
198	2,133	50	227	1,832	34	72	395	12	6	20	4

Employees provided financial expertise through leadership positions in multiple community organizations that offer services to low- and moderate-income individuals and families, promote affordable housing, community and economic development, and focus on area revitalization and stabilization. Community development services include 3,696 hours serving on boards and committees, 533 hours providing technical expertise, and 151 hours providing financial literacy education.

Community contacts stressed the critical need for all aspects of affordable housing and home improvements, and drug treatment and wraparound social services targeted to lower-income individuals and families as a result of the opioid crisis. Community contacts also expressed the need for workforce development initiatives for lower-skilled workers that pay a livable wage. The majority of community development services addressed these needs. Employees provided technical expertise, including but not limited to fund raising, for organizations that provide a multitude of wraparound social services and various aspects of affordable housing. Employees provided financial literacy training to low- and moderate-income children and financial workshops for small businesses and provided financial expertise to organizations that promote economic and workforce development across the community. As a result, these community development services are considered to be responsive to low- and moderate-income areas and individuals and available service opportunities in Nonmetropolitan Kentucky assessment area.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE LEXINGTON-FAYETTE
KY MSA #30460**

The Lexington-Fayette KY MSA (Lexington-Fayette) consists of entireties of Clark, Fayette, Scott and Woodford counties. CTB’s delineated assessment area excludes Bourbon and Jessamine counties. Due to changes in median family income levels resulting from changes in U.S. census data, this assessment area was comprised of the following tracts for this analysis:

	2015/2016	2017
Tract Income Level	Number of Tracts	Number of Tracts
Low	12	11
Moderate	25	23
Middle	40	46
Upper	37	34
Total	114	114

This assessment area lost one low-income census tract, two moderate-income tracts, and three upper-income tracts and gained six middle-income census tracts.

As of June 30, 2018, CTB ranked seventh out of 31 institutions with 4.4% of the deposit market share. Central Bank & Trust Company (Central Bank) and JPMorgan Chase ranked first and second with 17.2% and 16.9% of the deposit market share. Deposits in this assessment area accounted for 12.1% of CTB’s total deposits and ranks second in deposits within CTB’s CRA footprint.

From January 1, 2015 through December 31, 2017 CTB originated 726 HMDA-reportable loans and 359 CRA-reportable loans, which represents 14.4% and 21.0% of the total loans originated during the evaluation period. These are the second largest HMDA and CRA markets for loans originated during the evaluation period.

In 2017, CTB ranked 21 among 311 HMDA reporters in the assessment area. The top two HMDA lenders in the assessment area were Wells Fargo Bank, National Association and Central Bank. CTB ranked 13 of 90 CRA reporters in the assessment area in 2017. The top five CRA lenders in the assessment area were American Express, Chase Bank USA, National Association (Chase Bank USA, PNC Bank, National Association (PNC), Central Bank and Capital One. These lenders tend to be issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

A community contact interview was conducted to provide additional information regarding the assessment area. The contact is from a community action agency that promotes the reduction of poverty through providing a variety of programs throughout Kentucky. Services include

emergency and basic needs, education, energy assistance and health care, housing assistance, and adult day care and transportation services to and from medical appointments for seniors. The contact stated there is a significant need for affordable housing not just in this area but throughout Kentucky. Waiting lists for subsidized housing in the area are over 12 months. There is also a large demand for households meeting income guidelines to receive weatherization and other utility and home repair assistance in a timely manner. While Kentucky’s poverty rate is improving like the national rate, Kentucky remains among the poorest states in the county, especially in areas devastated by the collapse of the coal mining industry. The contact stated that investment in public job creation is needed in addition to safe affordable housing.

Two community contacts, which represent a community action partnership and affordable housing agency, referenced in Nonmetropolitan Kentucky assessment area also serve counties in the Lexington-Fayette MSA and will be given consideration to the performance context in this assessment area.

Population Characteristics

According to 2015 census data, the population in the assessment area was 419,458 of which 9.3% live in low-income tracts and 21.5% live in moderate-income tracts. In addition, 78.0% of the population was 18 years of age or older, which is the legal age to enter into a contract. The population age 65 and over was 15.9% in Clark County, 11.3% in Fayette County, 10.3% in Scott County, and 15.1% in Woodford County, compared to 14.4% in Kentucky. While Clark and Woodford counties have larger senior populations, the majority of the population resides in Fayette County which has an overall younger population (i.e., active workforce). The table also shows the area’s estimated population change from 2010 to 2018, with population increases overall.

Population Change					
County	2010 Population	2015 Population	Percent Change 2010-2015	2018 Population	Percent Change 2015-2018
Clark	35,613	35,666	0.1%	36,249	1.6%
Fayette	295,803	315,055	6.5%	323,780	2.8%
Scott	47,173	52,120	10.5%	56,031	7.5%
Woodford	24,939	25,806	3.5%	26,533	2.8%
State of Kentucky	4,339,367	4,422,057	1.9%	4,468,402	1.0%

Source: U.S. Census Bureau- American Fact Finder - 2017 Populations and 2018 Population Estimates

Largest Cities in Assessment Area by Population			
City	County	Population (July 1, 2018)	Population Growth (2000 – 2018)
Lexington-Fayette (2 nd largest city in Kentucky)	Fayette County	323,780	23.9%
Georgetown (7 th largest city in Kentucky)	Scott County	34,395	85.6%
Winchester	Clark County	18,577	11.0%
Versailles	Woodford County	9,316	17.8%

Source: Biggest US Cities By Population – Kentucky

Income Characteristics

The 2015 median family income (\$68,125) in the assessment area was greater than Kentucky median family income (\$55,367). As shown below, the assessment area median family income decreased from 2015 to 2017 but increased between 2017 and 2018.

Borrower Income Levels
Lexington-Fayette, KY - MSA

HUDEstimated Median Family Income		Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2017	\$66,600	0	-	\$33,299	\$33,300	-	\$53,279	\$53,280	-	\$79,919	\$79,920	-	& above
2018	\$70,100	0	-	\$35,049	\$35,050	-	\$56,079	\$56,080	-	\$84,119	\$84,120	-	& above

Between 2015 and 2016 poverty rates in the assessment area decreased in Scott and Fayette counties, respectively. Between 2016 and 2017 poverty rates generally decreased across the assessment area. As indicated in the table below, poverty rates in 2017 across the assessment area fell below the poverty rate in Kentucky; however, poverty rates in Clark and Fayette counties exceeded the national poverty rate.

Poverty Rates					
County	2015	2016	Percentage Point Change 2015-2016	2017	Percentage Point Change 2016-2017
Clark	15.4%	15.9%	0.5	14.1%	-1.8
Fayette	19.1%	17.9%	-1.2	16.5%	-1.4
Scott	13.1%	10.4%	-2.7	10.4%	0.0
Woodford	11.6%	12.1%	0.5	9.3%	-2.8
Kentucky	18.3%	18.2%	-0.1	17.1%	-1.1
U. S.	14.7%	14.0%	-0.7	13.4%	-0.6

Source: U.S. Census Bureau

According to 2015 census data, 16.4% of the 168,148 households in this assessment area are below the poverty level, 1.8% are receiving public assistance, and 19.1% have rent costs greater than 30.0% of their monthly income.

Housing Characteristics

According to the 2015 census data, there are 184,645 housing units and 102,464 families in the assessment area. From an income perspective, 9.5% of the housing units and 7.5% of families are in the assessment area's low-income tracts, while 22.7% of the housing units and 18.9% of families in the assessment area are in moderate-income tracts. In addition, 28.4% of the housing units in low-income tracts are owner occupied, 58.8% are rental and 12.8% are vacant, while 35.9% of housing units in moderate-income tracts are owner-occupied, 54.3% are rental, and 9.9% are vacant. Therefore, based on the lower percentage of families and housing units and the higher

percentage of rental/vacant units, there appears to be limited credit-related opportunities for CTB to make home purchase loans and provide various aspects of affordable housing in these tracts.

The 2015 census data shows the median age of housing stock was 39 years old and 11.6% of assessment area’s 184,645 housing units are at least 65 years old (built before 1950). This indicates there are opportunities to make home improvement loans. The median housing value in the assessment area was \$166,158 with an affordability ratio of 30.9. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. As indicated in the table below, median housing values increased between 2010 and 2015 with the greatest increase in value occurring in Clark County. However, during this same time period, housing became more affordable in Fayette, Scott, and Woodford counties most likely because median family income outpaced home price growth. In addition, median gross rents substantially increased across the assessment area. The table below presents housing characteristics from the census data between 2010 and 2015 in the assessment area, and Kentucky.

County	Housing Costs Change							
	Median Housing Value		Percent Change	2010 Affordability Ratio	2015 Affordability Ratio	Median Gross Rent		Percent Change
	2010	2015				2010	2015	
Clark	134,500	142,700	6.1%	34.6	33.6	631	698	10.6%
Fayette	159,200	168,100	5.6%	28.8	29.6	693	778	12.3%
Scott	158,700	164,600	3.7%	36.6	38.3	684	760	11.1%
Woodford	180,800	181,300	0.3%	31.3	32.4	724	725	0.1%
Kentucky	116,800	123,200	5.5%	35.6	35.5	601	675	12.3%

Source: U.S. Census Bureau

According to 2015 census data, 55.0% of renters in the assessment area have rent costs more than \$700 a month and nearly 45.2% of units for rent (71,079) have renters who are considered to be cost burdened or have rent costs greater than 30.0% of their monthly income. Increasing rental costs may make it more difficult for potential first-time homebuyers to save enough to make a sufficient down payment in the rising interest rate environment.

Building permits are a leading indicator of future activity in the construction sector. As indicated in the following table, the demand for building permits decreased between 2017 and 2018 but only slightly in Fayette County (the most populous county in the assessment area) and substantially in Scott and Woodford counties, respectively; while the demand for building permits increased in Clark County. Trends in the assessment area did not reflect trends in Kentucky and the nation.

Building Permits					
County	2016	2017	Percent of Change 2016-2017	2018	Percent of Change 2017 - 2018
Clark	47	43	-8.5%	49	14.0%
Fayette	670	743	10.9%	733	-1.3%
Scott	472	423	-10.4%	328	-22.5%
Woodford	85	104	22.4%	80	-23.1%
Kentucky	12,714	12,630	-0.7%	13,826	9.5%
U. S.	1,206,642	1,281,977	6.2%	1,328,827	3.7%

Source: U.S. Bureau of Labor Statistics

The overall decrease in the number of permits could indicate a decreasing demand for home purchase mortgage loans during this evaluation period.

Labor, Employment, and Economic Characteristics

According to ARC,²³ Clark County is in rural Appalachian Kentucky and its economic status was considered to be transitional as of fiscal year 2017.

According to Dun & Bradstreet, the majority of businesses (89.7%) in the assessment area have revenue under \$1 million. There are approximately 285,956 paid employees in this assessment area who are working in either the private sector or government according to Kentucky Regional Analysis Project (KY-REAP).²⁴ By percentage of employees, the largest job category in the assessment area is retail trade, health care and social assistance, state government, manufacturing, accommodation and food services, waste management, and local government.

The following table illustrates the average unemployment rates related to this assessment area.

²³ Appalachian Regional Commission (ARC) – County Economic Status, FY 2017:
https://www.arc.gov/reports/region_report.asp?FIPS=21999&REPORT_ID=62

²⁴ KY-REAP: https://kentucky.reaproject.org/analysis/industry-structure/industries_by_region/employment/

Unemployment Rates
Assessment Area: Lexington-Fayette, KY MSA #30460

Area	Years - Annualized	
	2017	2018
Clark County	4.7	4.1
Fayette County	3.7	3.3
Scott County	3.7	3.3
Woodford County	3.3	3.1
Lexington-Fayette, KY MSA #30460	3.7	3.4
Kentucky	4.9	4.3
National	4.4	3.9

Not Seasonally Adjusted

Data extracted on October 3, 2019

Unemployment rates across the assessment area declined between 2017 and 2018 same as Kentucky and the nation. In the assessment area Clark County had the highest unemployment rate during this time.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
LEXINGTON-FAYETTE, KY MSA #30420**

Lending Test

CTB’s performance under the lending test in this assessment area is good. CTB’s lending activity demonstrates a good responsiveness to the credit needs of the community. CTB makes a relatively high level of community development loans. CTB originated five community development loans totaling \$5.8 million. CTB has an excellent geographic distribution of loans, a moderate level of lending gaps, and a good distribution among borrowers of different income levels and to businesses of different revenue sizes. CTB makes use of flexible lending practices in this assessment area. CTB exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area and a good record of serving the credit needs of low-income individuals or businesses with gross annual revenues of \$1 million or less.

Borrower distribution received greater weight than geographic distribution based on the percentage of families by family income compared to the percentage of low- and moderate-income geographies in this assessment area. Greatest consideration was given to the evaluation of home purchase lending based on the overall volume of loans followed by small business lending, refinance, and home improvement. Details of CTBs residential mortgage and small business lending and information regarding peer lending is in Appendices D, E and F.

Lending Activity

Lending levels reflect a good responsiveness to the credit needs in the assessment area. The percentage of CTB’s lending in the Lexington-Fayette MSA is 15.9%, while the percentage of total deposits is greater at 12.1%. CTB originated 726 HMDA loans and 359 CRA loans and had

a moderate level of lending gaps in this assessment area during the evaluation period. Lastly, while no substantial concentration of loans was identified in excluded counties, a small concentration of loans was identified in Jessamine County in the Lexington-Fayette MSA during the evaluation period.

Distribution by Borrower Income and Revenue Size of the Business

CTB's overall distribution among borrowers of different income levels and businesses of different sizes is good. Borrower distribution is good for home purchase, refinance, and small business lending, while excellent for home improvement lending.

Home Purchase Lending

CTB made 143 home purchase loans totaling \$26.1 million in 2017. Also, there were 31 (21.7%) home purchase loans totaling \$3.8 (4.5%) million made to borrowers with unknown income designations compared to aggregate of all lenders that made 19.6% by volume and 18.8% by dollar amount.

In 2017 CTB made 10 (7.0%) home purchase loans totaling \$1.0 million (3.8%) to low-income borrowers, which was well below the percentage of families at 22.5% by loan volume and dollar amount. However, the percentage of loans by volume exceeded the 2017 aggregate at 6.0% and by dollar amount at 3.3%. While performance was well below proxy, given CTB's strong performance compared to aggregate of all lenders, the borrower distribution of home purchase loans to low-income borrowers is adequate.

CTB made 25 (17.5%) home purchase loans totaling \$2.9 million (11.2%) to moderate-income borrowers, which exceeded the percentage of families at 16.0% by volume and was below by dollar amount. The percentage of loans by volume was slightly below the 2017 aggregate at 19.6% and dollar amount at 14.4%. Given CTB's performance compared proxy and aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is good.

CTB made 22 home purchase loans totaling \$3.5 million to middle-income borrowers. This represents 15.4% of home purchase loans by volume and 13.4% by dollar amount, compared to the percentage of families at 19.1%. The 2017 aggregate of all lenders made 19.3% by volume and 17.6% by dollar amount to middle-income borrowers.

CTB made 55 home purchase loans totaling \$14.9 million to upper-income borrowers. This represents 38.5% of home purchase loans by volume and 57.0% by dollar amount, compared to the percentage of families at 42.4%. The 2017 aggregate of all lenders made 35.5% by volume and 45.9% by dollar amount to upper-income borrowers.

CTB made 143 home purchase loans totaling \$23.9 million in 2016. Also, there were 33 (23.1%) home purchase loans totaling \$4.8 million (20.1%) made to borrowers with unknown income designations compared to aggregate of all lenders that made 17.8% by volume and 16.8% by dollar amount.

In 2016 CTB made 11 (7.7%) home purchase loans totaling \$1.1 million (4.7%) to low-income borrowers, which was well below the percentage of families at 15.6%. However, the percentage of loans by volume and dollar amount exceeded the 2016 aggregate at 7.6% and 4.3%, respectively. Given CTB's performance compared to proxy and strong performance compared to aggregate of all lenders, the borrower distribution of home purchase loans to low-income borrowers is good.

CTB made 19 (13.3%) home purchase loans totaling \$2.5 million (10.3%) to moderate-income borrowers, which was slightly below the percentage of families at 15.6% by loan volume and dollar amount. The percentage of loans by volume and dollar amount was below the 2016 aggregate at 19.2% and 14.4%, respectively. Given CTB's performance compared proxy and aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is adequate.

CTB made 18 home purchase loans totaling \$2.8 million to middle-income borrowers. This represents 12.6% of home purchase loans by volume and 11.8% by dollar amount, compared to the percentage of families at 19.9%. The 2016 aggregate of all lenders made 21.8% by volume and 20.2% by dollar amount to middle-income borrowers.

CTB made 62 home purchase loans totaling \$12.7 million to upper-income borrowers. This represents 43.4% of home purchase loans by volume and 53.2% by dollar amount, compared to the percentage of families at 42.0%. The 2016 aggregate of all lenders made 33.6% by volume and 44.4% by dollar amount to upper-income borrowers.

CTB made 138 home purchase loans totaling \$21.4 million in 2015. Also, there were 34 (24.6%) home purchase loans totaling \$4.6 million (21.5%) made to borrowers with unknown income designations compared to the aggregate of all lenders that made 33.0% by volume and 43.8% by dollar amount.

In 2015 CTB made 14 (10.1%) home purchase loans to low-income borrowers totaling \$1.2 million (5.7%), which was well below the percentage of families at 22.4% by loan volume and dollar amount. However, the percentage of loans by volume and dollar amount exceeded the 2015 aggregate at 8.3% and 4.7%, respectively. While performance was below proxy, Given CTB's strong performance compared to aggregate of all lenders, the borrower distribution of home purchase loans to low-income borrowers is good.

CTB made 19 (13.8%) home purchase loans totaling \$2.6 million (12.2%) to moderate-income borrowers, which was slightly below the percentage of families at 15.6% by loan volume and dollar amount. The percentage of loans by volume was below the 2015 aggregate at 20.1% and slightly below by dollar amount at 14.8%. Given CTB's performance compared proxy, the borrower distribution of home purchase loans to moderate-income borrowers is good.

CTB made 22 home purchase loans totaling \$2.6 million to middle-income borrowers. This represents 15.9% of home purchase loans by volume and 12.1% by dollar amount, compared to the percentage of families at 19.9%. The 2015 aggregate of all lenders made 20.3% by volume and 18.4% by dollar amount to middle-income borrowers.

CTB made 49 home purchase loans totaling \$10.4 million to upper-income borrowers. This represents 35.5% of home purchase loans by volume and 48.5% by dollar amount, compared to the percentage of families at 42.0%. The 2015 aggregate of all lenders made 33.0% by volume and 43.8% by dollar amount to upper-income borrowers.

Overall CTB's home purchase lending performance was mixed compared to the percentage of families and mostly exceeded the aggregate of all lenders; therefore, borrower distribution of home purchase loan lending is good.

Refinance Lending

CTB made 57 refinance loans totaling \$14.1 million in 2017. Also, there were 11 (19.3%) home purchase loans totaling \$5.8 million (41.5%) made to borrowers with unknown income designations, compared to the 2017 aggregate of all lenders that made 22.0% by volume and 24.8% by dollar amount.

In 2017 CTB made six (10.5%) refinance loans totaling \$418,000 (3.0%) to low-income borrowers, which was well below the percentage of families at 22.5% by loan volume and dollar amount. However, the percentage of loans by volume substantially exceeded the 2017 aggregate at 6.6% and was slightly below by dollar amount at 3.2%. While performance was below proxy, given CTB's strong performance compared to the aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is good.

CTB made six (10.5%) refinance loans totaling \$687,000 (4.9%) to moderate-income borrowers, which was below the percentage of families at 16.0% by loan volume and dollar amount. The percentage of loans by volume and dollar amount was below the 2017 aggregate at 14.4% and 9.3%, respectively. Given CTB's performance compared proxy and the aggregate of all lenders, the borrower distribution of refinance loans to moderate-income borrowers is adequate.

CTB made 11 refinance loans totaling \$1.5 million to middle-income borrowers. This represents 19.3% of refinance loans by volume and 10.6% by dollar amount, compared to the percentage of families at 19.1%. The 2017 aggregate of all lenders made 19.3% by volume and 15.1% by dollar amount to middle-income borrowers.

CTB made 23 refinance loans totaling \$5.6 million to upper-income borrowers. This represents 40.4% of refinance loans by volume and 40.0% by dollar volume, compared to the percentage of families at 42.4%. The 2017 aggregate of all lenders made 37.6% by volume and 47.6% by dollar amount to upper-income borrowers.

CTB made 66 refinance loans totaling \$10.5 million in 2016. Also, there were three (4.5%) refinance loans totaling \$307,000 (2.9%) made to borrowers with unknown income designations, compared to the 2016 aggregate of all lenders that made 23.4% by volume and 24.3% by dollar amount.

In 2016 CTB made five (7.6%) refinance loans to low-income borrowers totaling \$462,000 (4.4%), which was well below the percentage of families at 22.4% by loan volume and dollar amount. However, the percentage of loans by volume and dollar amount substantially exceeded the 2016

aggregate at 6.1% and 2.9%, respectively. While performance was well below proxy, considering CTB's strong performance compared to aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is good.

CTB made 13 (19.7%) refinance loans totaling \$1.5 million (13.8%) to moderate-income borrowers, which substantially exceeded the percentage of families at 15.6% by volume and was slightly below by dollar amount. However, the percentage of loans by volume and dollar amount substantially exceeded the 2016 aggregate at 12.8% and 8.2%, respectively. Given CTB's strong performance compared proxy and aggregate of all lenders, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

CTB made 18 refinance loans totaling \$2.4 million to middle-income borrowers. This represents 27.3% of refinance loans by volume and 23.05 by dollar amount, compared to the percentage of families at 19.9%. The 2016 aggregate of all lenders made 18.8% by volume and 14.8% by dollar amount to middle-income borrowers.

CTB made 27 refinance loans totaling \$5.9 million to upper-income borrowers. This represents 40.9% of refinance loans by volume and 55.9% by dollar amount, compared to the percentage of families at 42.0%. The 2016 aggregate of all lenders made 38.9% by volume and 49.8% by dollar amount to upper-income borrowers.

CTB made 59 refinance loans totaling \$10.2 million in 2015. Also, there were five (8.5%) refinance loans totaling \$1.0 million (9.9%) made to borrowers with unknown income designations, compared to the 2015 aggregate of all lenders that made 22.0% by volume and 24.4% by dollar amount.

In 2015 CTB made seven (11.9%) refinance loans to low-income borrowers totaling \$527,000 (5.1%), which was below the percentage of families at 22.4% by loan volume and dollar amount. However, the percentage of loans by volume substantially exceeded the 2015 aggregate at 8.1% and exceeded the aggregate by dollar amount at 4.3%. While performance was below proxy, considering CTB's strong performance compared to the aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is good.

CTB made nine (15.3%) refinance loans totaling \$1.3 million (12.6%) to moderate-income borrowers, which was slightly below the percentage of families at 15.6% by loan volume and dollar amount. However, the percentage of loans by volume was comparable to the 2015 aggregate at 15.3% and exceeded the aggregate by dollar amount at 10.3%. Given CTB's performance compared to proxy and aggregate, the borrower distribution of refinance loans to moderate-income borrowers is good.

CTB made 12 refinance loans totaling \$1.6 million to middle-income borrowers. This represents 20.3% of refinance loans by volume and 15.1% by dollar amount, compared to the percentage of families at 19.9%. The 2015 aggregate of all lenders made 19.2% by volume and 16.0% by dollar amount to middle-income borrowers.

CTB made 26 refinance loans totaling \$5.8 million to upper-income borrowers. This represents 44.1% of refinance loans by volume and 57.2% by dollar amount, compared to the percentage of families at 42.0%. The 2015 aggregate of all lenders made 35.2% by volume and 45.1% by dollar amount to upper-income borrowers.

Overall CTB's refinance lending performance varied compared to the percentage of families and mostly exceeded the aggregate of all lenders; therefore, borrower distribution of refinance lending is good.

Home Improvement Lending

CTB made 37 home improvement loans totaling \$2.3 million in 2017. Also, there were five (13.5%) home improvement loans totaling \$319,000 (14.0%) made to borrowers with unknown income designations, compared to the 2017 aggregate of all lenders that made 9.9% by volume and 11.0% by dollar amount.

In 2017 CTB made six (16.2%) home improvement loans totaling \$216,000 (9.5%) to low-income borrowers, which is below the percentage of families at 22.5% by loan volume and dollar amount. However, the percentage of loans by volume and dollar amount substantially exceeded the 2017 aggregate of all lenders at 8.8%. Given CTB's performance compared to proxy and strong performance compared to the aggregate of all lenders, the borrower distribution of home improvement loans to low-income borrowers is good.

CTB made six (16.2%) home improvement loans totaling \$383,000 (16.8%) to moderate-income borrowers, which exceeded the percentage of families at 16.0% by loan volume and dollar amount. The percentage of loans by volume was slightly below the 2017 aggregate of all lenders at 17.5% and substantially exceeded the aggregate by dollar amount at 10.9%. Given CTB's strong performance compared proxy and aggregate of all lenders, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

CTB made five home improvement loans totaling \$51,000 to middle-income borrowers. This represents 13.5% of home improvement loans by volume and 2.2% by dollar amount, compared to the percentage of families at 19.1%. The 2017 aggregate of all lenders made 20.3% by volume and 18.1% by dollar amount to middle-income borrowers.

CTB made 15 home improvement loans totaling \$1.3 million to upper-income borrowers. This represents 40.5% of home improvement loans by volume and 57.5% by dollar amount compared to, the percentage of families at 42.4%. The 2017 aggregate of all lenders made 43.4% by volume and 56.5% by dollar amount to upper-income borrowers.

CTB made 28 home improvement loans totaling \$1.6 million in 2016. Also, there was one (3.6%) home improvement loan totaling \$40,000 (2.5%) made to a borrower with an unknown income designation, compared to the 2016 aggregate of all lenders that made 8.3% by volume and 12.0% by dollar amount.

In 2016 CTB made three (10.7%) home improvement loans totaling \$90,000 (5.6%) to low-income borrowers, which was well below the percentage of families at 15.6% by loan volume and dollar amount. However, the percentage of loans by volume and dollar amount substantially exceeded the 2016 aggregate at 8.8% and 3.9%, respectively. While performance was well below proxy, given CTB's strong performance compared to the aggregate of all lenders, borrower distribution of home improvement loans to low-income borrowers is good.

CTB made 13 (46.4%) home improvement loans totaling \$425,000 (26.4%) to moderate-income borrowers, which substantially exceeded the percentage of families at 15.6% by loan volume and dollar amount. The percentage of loans by volume and dollar amount also substantially exceeded the 2016 aggregate at 16.3% and 8.1%, respectively. Given CTB's strong performance compared proxy and aggregate of all lenders, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

CTB made three home improvement loans totaling \$287,000 to middle-income borrowers. This represents 10.7% of home improvement loans by volume and 17.8% by dollar amount, compared to the percentage of families at 19.9%. The 2016 aggregate of all lenders made 20.7% by volume and 15.0% by dollar amount to middle-income borrowers.

CTB made eight home improvement loans totaling \$767,000 to upper-income borrowers. This represents 28.6% of home improvement loans by volume, compared to the percentage of families at 42.0% and exceeded the proxy by dollar amount at 47.7%. The 2016 aggregate of all lenders made 45.8% by volume and 61.0% by dollar amount to upper-income borrowers.

CTB made 39 home improvement loans totaling \$3.2 million in 2015. Also, there were three (7.7%) home improvement loans totaling \$210,000 (6.5%) made to borrowers with unknown income designations, compared to the 2015 aggregate of all lenders that made 10.3% by volume and 16.1% by dollar amount.

In 2015 CTB made six (15.4%) home improvement loans totaling \$486,000 (15.0%) to low-income borrowers, which is below the percentage of families at 22.4% by loan volume and dollar amount. However, the percentage of loans by volume and dollar amount substantially exceeded the 2015 aggregate at 12.6% and 5.8%, respectively. Given CTB's performance compared to proxy and strong performance compared to the aggregate of all lenders, the borrower distribution of home improvement loans to low-income borrowers is good.

CTB made nine (23.1%) home improvement loans totaling \$509,000 (15.7%) to moderate-income borrowers, which substantially exceeded the percentage of families at 15.6% by volume and exceeded proxy by dollar amount. The percentage of loans by volume and dollar amount also substantially exceeded the 2015 aggregate of all lenders at 18.7% and 9.4%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

CTB made ten home improvement loans totaling \$1.1 million to middle-income borrowers. This represents 25.6% of home improvement loans by volume and 33.9% by dollar amount, compared

to the percentage of families at 19.9%. The 2015 aggregate of all lenders made 21.0% by volume and 13.1% by dollar amount to middle-income borrowers.

CTB made 11 home improvement loans totaling \$940,000 to upper-income borrowers. This represents 28.2% of home improvement loans by volume and 29.0% by dollar amount, compared to the percentage of families at 42.0%. The 2015 aggregate of all lenders made 37.4% by volume and 55.6% by dollar amount to upper-income borrowers.

Overall CTB's home improvement lending performance generally exceeded the percentage of families and aggregate of all lenders; therefore, borrower distribution of home improvement lending is excellent. CTB was responsive to the need for home improvement loans, including weatherization loans, which was identified by a community contact.

Small Business Lending

CTB made 133 small business loans totaling \$20.0 million to businesses of different sizes in 2017 and 71 (53.4%) of these loans totaling \$9.0 million (45.0%) were made to businesses with revenues of \$1 million or less. While this is below the percentage of small businesses in the assessment area at 89.7%, the percentage of loans by volume and dollar amount exceeded the 2017 aggregate of all lenders at 50.8% and 37.4%, respectively. Therefore, the distribution of small business loans to businesses of different sizes is good considering CTB's performance relative to the aggregate of all lenders.

In 2017 CTB made an adequate percentage of small dollar loans (51.9%) in amounts of \$100,000 or less compared to 89.5% of small dollar loans made by the aggregate of all lenders. This basically indicates a willingness to lend in smaller amounts which tend to represent amounts typically requested by small businesses.

CTB made 116 small business loans totaling \$18.9 million to businesses of different sizes in 2016 and 62 (53.4%) of these loans totaling \$6.9 million (36.6%) were made to businesses with revenues of \$1 million or less. While this is below the percentage of small businesses in the assessment area at 90.8%, the percentage of loans by volume exceeded the 2016 aggregate of all lenders at 46.4% and was comparable by dollar amount at 37.6%. Therefore, the distribution of small business loans to businesses of different sizes is adequate considering CTB's performance relative to proxy and aggregate of all lenders.

In 2016 CTB was able to make an adequate percentage of small dollar loans (60.3%) in amounts of \$100,000 or less compared to 91.2% of small dollar loans made by the aggregate of all lenders. This basically indicates a willingness to lend in smaller amounts which tend to represent amounts typically requested by small businesses.

CTB made 110 small business loans totaling \$16.3 million to businesses of different sizes in 2015, and 53 (48.2%) of these loans totaling \$7.7 million (46.8%) to businesses with revenues of \$1 million or less. While this performance is below the percentage of small business in the assessment area at 92.4%, the percentage of loans by volume was comparable to the 2015 aggregate of all lenders and exceeded the aggregate by dollar amount at 42.0%. Therefore, the

distribution of small business loans to businesses of different sizes is good considering CTB’s performance relative to proxy and aggregate of all lenders.

In 2015 CTB was able to make an adequate percentage of small dollar loans (57.3%) in amounts of \$100,000 or less compared to 91.4% of the small dollar loans made by the aggregate of all lenders. This basically indicates a willingness to lend in smaller amounts which tend to represent amounts typically requested by small businesses.

Overall CTB’s small business lending performance was slightly below proxy and generally exceeded aggregate of all lenders, and CTB displayed a consistent willingness to make small dollar loans; therefore, borrower distribution of small business lending is good.

Geographic Distribution of Loans

CTB’s overall distribution of lending among geographies is excellent. Home purchase and refinance are excellent, while home improvement and small business lending are good. The following gaps in lending were noted in the assessment area.

Tract Income Level	Percentage of Lending Penetration		
	2015	2016	2017
Low	66.7%	66.7%	72.7%
Moderate	92.0%	68.0%	87.0%
Middle	90.0%	70.0%	87.0%
Upper	81.1%	89.2%	88.2%
Total	85.1%	75.4%	86.0%

Overall lending gaps are moderate. CTB was able to make one or more loans in a majority of its low- and moderate-income tracts in the evaluation period. There is also substantial competition from larger financial institutions in this assessment area. The low-income tracts have owner-occupancy rates less than 30.0% and rental/vacancy rates over 70.0%. Moderate-income tracts have owner-occupancy rates less than 40.0% and rental/vacancy rates over 60.0%. These factors likely impacted CTB’s ability to lend in these areas.

Home Purchase Lending

CTB made 143 home purchase loans totaling \$26.2 million in 2017. CTB made seven (4.9%) home purchase loans totaling \$821,000 (3.1%) in low-income tracts, which was comparable by volume to the percentage of owner-occupied units in these tracts at 5.2% and below by dollar amount. The percentage of home purchase loans substantially exceeded the 2017 aggregate of all lenders at 3.4%. Given CTB’s performance compared to proxy and strong performance compared to aggregate of all lenders, the geographic distribution of home purchase loans in low-income tracts is excellent.

CTB made 22 (15.4%) home purchase loans totaling \$2.2 million (8.5%) in moderate-income tracts, which was slightly below by volume and dollar amount to the percentage of owner-occupied

units in these tracts at 15.5%. The percentage of loans exceeded the 2017 aggregate of all lenders at 13.9% by volume and was slightly below at 9.5% by dollar amount. Given CTB's performance compared to proxy and strong performance compared to aggregate of all lenders, the geographic distribution of home purchase loans in moderate-income tracts is excellent.

CTB made 74 home purchase loans totaling \$12.5 million in middle-income tracts. This represents 51.7% of home purchase loans by volume and 48.1% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 41.5%. The 2017 aggregate of all lenders made 42.6% by volume and 38.6% by dollar amount in middle-income tracts.

CTB made 40 home purchase loans totaling \$10.5 million in upper-income tracts. This represents 28.0% of home purchase loans by volume and 40.3% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 37.9% by volume but above the proxy by dollar amount. The 2017 aggregate of all lenders made 40.0% by volume and 49.7% by dollar amount in upper-income tracts.

CTB made 143 home purchase loans totaling \$23.4 million in 2016. CTB made 13 (9.1%) home purchase loans totaling \$1.3 million (5.5%) in low-income tracts, which substantially exceeded the percentage of owner-occupied units in these tracts at 4.6%. The percentage of loans substantially exceeded the 2016 aggregate by volume and dollar amount at 3.6% and 2.5%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of home purchase loans in low-income tracts is excellent.

CTB made 22 (15.4%) home purchase loans totaling \$2.8 million (11.9%) in moderate-income tracts, which was slightly below the percentage of owner-occupied units in these tracts at 18.6%. The percentage of loans exceeded the 2016 aggregate of all lenders by volume and dollar amount at 15.2% and 9.9%, respectively. Given CTB's performance compared to proxy and strong performance compared to aggregate of all lenders, the geographic distribution of home purchase loans in moderate-income tracts is good.

CTB made 61 home purchase loans totaling \$9.3 million in middle-income tracts. This represents 42.7% of home purchase loans by volume and 39.0% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 39.2%. The 2016 aggregate of all lenders made 38.1% by volume and 34.7% by dollar amount in middle-income tracts.

CTB made 47 home purchase loans totaling \$10.4 million in upper-income tracts. This represents 32.9% of home purchase loans by volume and 43.7% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 37.6%. The 2016 aggregate of all lenders made 43.1% by volume and 53.0% by dollar amount in upper-income tracts.

CTB made 138 home purchase loans totaling \$21.4 million in 2015. CTB made seven (5.1%) home purchase loans totaling 979,000 (4.6%) in low-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 4.6% by volume and was comparable by dollar amount. The percentage of loans by volume and dollar amount substantially exceeded the 2015 aggregate of all lenders at 3.8% and 3.1%, respectively. Given CTB's strong performance compared to proxy

and aggregate of all lenders, the geographic distribution of home purchase loans in low-income tracts is excellent.

CTB made 32 (23.2%) home purchase loans totaling \$3.8 million (17.6%) in moderate-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 18.6% by volume and was comparable by dollar amount. The percentage of loans by volume and dollar amount substantially exceeded the 2015 aggregate of all lenders at 13.8% and 9.4%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of home purchase loans in moderate-income tracts is excellent.

CTB made 56 home purchase loans totaling \$8.1 million in middle-income tracts. This represents 40.6% of home purchase loans by volume and 37.6% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 39.2%. The 2015 aggregate of all lenders made 38.0% by volume and 34.0% by dollar amount in middle-income tracts.

CTB made 44 home purchase loans totaling \$8.6 million in upper-income tracts. This represents 31.2% of home purchase loans by volume and 40.2% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 42.0%. The 2015 aggregate of all lenders made 44.4% by volume and 53.5% by dollar amount in upper-income tracts.

Overall CTB home purchase lending performance mostly exceeded proxy and the aggregate of all lenders; therefore, geographic distribution of home purchase lending is excellent. Opportunities to make home purchase loans were likely hampered by the relatively low owner-occupancy rates in low- and moderate-income tracts. CTB was able to make loans in spite of these conditions and this reinforces that performance is excellent.

Refinance Lending

CTB made 57 refinance loans totaling \$14.1 million in 2017. CTB made five (8.8%) refinance loans totaling \$363,000 (2.6%) in low-income tracts, which substantially exceeded the percentage of owner-occupied units in these tracts at 5.2% by volume and was well below by dollar amount. The percentage of loans substantially exceeded the 2017 aggregate of all lenders by volume at 5.0% and was below by dollar amount at 2.3%. Given CTB's substantially strong performance compared to proxy and aggregate of all lenders by volume, the geographic distribution of refinance loans in low-income tracts is excellent.

CTB made 12 (21.1%) refinance loans totaling \$1.1 million (8.0%) in moderate-income tracts, which substantially exceeded the percentage of owner-occupied units in these tracts at 15.5% by volume and was below by dollar amount. The percentage of loans substantially exceeded the 2017 aggregate of all lenders by volume at 13.8% and was slightly below by dollar amount at 10.2%. Given CTB's substantially strong performance compared to proxy and aggregate of all lenders by volume, the geographic distribution of refinance loans in moderate-income tracts is excellent.

CTB made 20 refinance loans totaling \$3.3 million in middle-income tracts. This represents 35.1% of refinance loans by volume and 23.2% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 41.5%. The 2017 aggregate of all lenders made 42.3% by volume and 38.3% by dollar amount in middle-income tracts.

CTB made 20 refinance loans totaling \$9.3 million in upper-income tracts. This represents 35.1% of refinance loans by volume and 66.2% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 37.9%. The 2017 aggregate of all lenders made 38.9% by volume and 47.3% by dollar amount in upper-income tracts.

CTB made 66 refinance loans totaling \$10.5 million in 2016. CTB made six (9.1%) refinance loans totaling \$491,000 (4.6%) in low-income tracts, which substantially exceeded the percentage of owner-occupied units in these tracts at 4.6% by volume and was the same as the percentage of lending by dollar amount. The percentage of loans by volume and dollar amount substantially exceeded the 2016 aggregate of all lenders at 4.2% and 2.9%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of refinance loans in low-income tracts is excellent.

CTB made four (6.1%) refinance loans totaling \$339,000 (3.2%) in moderate-income tracts, which was well below the percentage of owner-occupied units in these tracts at 18.6%. The percentage of loans by volume and dollar amount was well below the 2016 aggregate of all lenders at 12.7% and 8.6%, respectively. Given CTB's performance compared to proxy and aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is poor.

CTB made 25 refinance loans totaling \$4.0 million in middle-income tracts. This represents 37.9% of refinance loans by volume and 38.4% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 39.2%. The 2016 aggregate of all lenders made 35.8% by volume and 32.6% by dollar amount in middle-income tracts.

CTB made 31 refinance estate mortgage loans totaling \$5.6 million in upper-income tracts. This represents 47.0% of refinance loans by volume and 53.7% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 37.6%. The 2016 aggregate of all lenders made 47.3% by volume and 55.9% by dollar amount in upper-income tracts.

CTB made 59 refinance loans totaling \$10.2 million in 2015. CTB made six (10.2%) refinance loans totaling \$580,000 (5.6%) in low-income tracts, which substantially exceeded the percentage of owner-occupied units in these tracts at 4.6%. The percentage of loans by volume and dollar amount substantially exceeded the 2015 aggregate 3.8% and 2.7%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of refinance loans in low-income tracts is excellent.

CTB made 11 (18.6%) refinance loans totaling \$1.7 million (16.1%) in moderate-income tracts, which was the same as the percentage of owner-occupied units in these tracts at 18.6% by volume but was below by dollar amount. The percentage of loans by volume and dollar amount substantially exceeded the 2015 aggregate at 15.0% and 10.5%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is excellent.

CTB made 29 refinance loans totaling \$4.5 million in middle-income tracts. This represents 49.2% of refinance loans by volume and 43.7% dollar volume, compared to the percentage of owner-

occupied units in these tracts at 39.2%. The 2015 aggregate of all lenders made 37.5% by volume and 33.7% by dollar amount in middle-income tracts.

CTB made 13 refinance estate mortgage loans totaling \$3.6 million in upper-income tracts. This represents 22.0% of refinance loans by volume and 34.6% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 37.6% by volume and by dollar amount. The 2015 aggregate of all lenders made 43.7% by volume and 53.1% by dollar amount in upper-income tracts.

Overall CTB refinance lending performance mostly exceeded proxy and the aggregate of all lenders; therefore, geographic distribution of refinance lending is excellent. CTB was able to make loans in low- and moderate-income tracts even with relatively low owner-occupancy rates in these areas.

Home Improvement Lending

CTB made 37 home improvement loans totaling \$2.2 million in 2017. CTB made three (8.1%) home improvement loans totaling \$205,000 (9.0%) in low-income tracts, which substantially exceeded the percentage of owner-occupied units in these tracts at 5.2%. The percentage of loans substantially exceeded the 2017 aggregate by volume and dollar amount at 4.7% and 3.7%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of home improvement loans in low-income tracts is excellent.

CTB made nine (24.3%) home improvement loans totaling \$255,000 (11.2%) in moderate-income tracts, which substantially exceeded the percentage of owner-occupied units in these tracts at 15.5% but was below the proxy by dollar amount. The percentage of loans substantially exceeded the 2017 aggregate by volume at 16.7% and was comparable by dollar amount at 11.9%. Given CTB's performance strong performance compared to proxy and aggregate of all lenders by volume, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

CTB made 18 home improvement loans totaling \$825,000 in middle-income tracts. This represents 48.6% of home improvement loans by volume and 36.2% by dollar amount, compared to the percentage of owner-occupied units at 41.5%. The 2017 aggregate of all lenders made 43.4% by volume and 37.2% by dollar amount in middle-income tracts.

CTB made seven home improvement loans totaling \$996,000 in upper-income tracts. This represents 18.9% of home improvement loans by volume and 43.7% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 37.9%. The 2017 aggregate of all lenders made 35.2% by volume and 47.3% by dollar amount in upper-income tracts.

CTB made 28 home improvement loans totaling \$1.6 million in 2016. CTB made no home improvement loans in low-income tracts, while the percentage of owner-occupied units in these tracts was 4.6%. The 2016 aggregate of all lenders made 4.8% of its home improvement loans by volume and 4.3% by dollar volume. Given CTB's performance compared to proxy and aggregate of all lenders, the geographic distribution of home improvement loans in low-income tracts is poor.

CTB made seven (25.0%) home improvement loans totaling \$401,000 (24.9%) in moderate-income tracts, which substantially exceeded the percentage of owner-occupied units in these tracts at 18.6%. The percentage of loans by volume and dollar amount substantially exceeded the 2016 aggregate at 16.2% and 9.2%, respectively. Given CTB's strong performance compared to proxy and the aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

CTB made 14 home improvement loans totaling 536,000 in middle-income tracts. This represents 50.0% of home improvement loans by volume and 33.3% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 39.2%. The 2016 aggregate of all lenders made 35.7% by volume and 29.9% by dollar amount in middle-income tracts.

CTB made seven home improvement loans totaling \$672,000 in upper-income tracts. This represents 25.0% of home improvement loans by volume and 41.8% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 37.6%. The 2016 aggregate of all lenders made 43.3% by volume and 56.6% by dollar amount in upper-income tracts.

CTB made 39 home improvement loans totaling \$3.2 million in 2015. CTB made two (5.1%) home improvement loans totaling \$70,000 (2.2%) in low-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 4.6% by volume but was well below the proxy by dollar amount. The percentage of loans by volume and dollar amount was slightly below the 2015 aggregate at 5.2% and 2.6%, respectively. Given CTB's stronger performance compared to proxy and comparable performance compared to aggregate of all lenders, the geographic distribution of home improvement loans in low-income tracts is good.

CTB made four (10.3%) home improvement loans totaling \$376,000 (11.6%) in moderate-income tracts, which was below the percentage of owner-occupied units in these tracts at 18.6%. The percentage of loans was below the 2015 aggregate at 18.0% by volume and exceeded the aggregate by dollar amount at 10.0%. Given CTB's performance compared to proxy and aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is adequate.

CTB made 19 home improvement loans totaling \$1.3 million in middle-income tracts. This represents 48.7% of home improvement loans by volume and 40.4% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 39.2%. The 2015 aggregate of all lenders made 37.6% by volume and 33.1% by dollar amount in middle-income tracts.

CTB made 14 home improvement loans totaling \$1.5 million in upper-income tracts. This represents 35.9% of home improvement loans by volume and 45.9% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 37.6%. The 2015 aggregate of all lenders made 39.2% by volume and 54.3% by dollar amount in upper-income tracts.

Overall CTB home improvement lending performance varied compared to proxy and aggregate of all lenders; therefore, geographic distribution of home improvement lending is good.

Small Business Lending

CTB made 133 small business loans totaling \$20.0 million in 2017. CTB made nine (6.8%) loans in low-income tracts totaling \$495,000 (2.5%), which exceeded the percentage of businesses in these tracts at 6.3% by volume and but below the proxy by dollar amount. The percentage of loans by volume exceeded the 2017 aggregate of all lenders at 5.8% and was well below by dollar amount at 8.4%. Given CTB's strong performance compared to proxy and aggregate of all lenders by volume and weaker performance by dollar amount, the geographic distribution of small business loans in low-income tracts is good.

CTB made 26 (19.5%) loans in moderate-income tracts totaling \$2.5 million (12.2%), which exceeded the percentage of businesses in these tracts at 16.9% by volume but was below the proxy by dollar amount. The percentage of loans by volume exceeded the 2017 aggregate of all lenders at 16.6% and was slightly below by dollar amount at 15.7%. Given CTB's strong performance compared to the proxy and aggregate of all lenders by volume and decent performance by dollar amount, the geographic distribution of small business loans in moderate-income tracts is excellent.

CTB made 37 loans in middle-income tracts totaling \$7.6 million. This represents 27.8% of small business loans by volume and 38.0% by dollar amount, compared to the percentage of businesses in these tracts at 43.9%. The 2017 aggregate of all lenders made 42.8% by volume and 45.9% by dollar amount in middle-income tracts.

CTB made 61 loans in upper-income tracts totaling \$9.5 million. This represents 45.9% of small business loans by volume and 47.3% by dollar amount, compared to the percentage of businesses in these tracts at 32.9%. The 2017 aggregate of all lenders made 33.9% by volume and 29.8% by dollar amount in upper-income tracts.

CTB made 116 small business loans totaling \$18.9 million in 2016. CTB made nine (7.8%) loans in low-income tracts totaling \$555,000 (2.9%), which exceeded the percentage of businesses in these tracts at 7.1% by volume but was well below the proxy by dollar amount. The percentage of loans was slightly below the 2016 aggregate of all lenders at 8.6% by volume but was well below the aggregate of 8.9% by dollar amount. Given CTB's strong performance compared to proxy by volume, the geographic distribution of small business loans in low-income tracts is good.

CTB made 26 (22.4%) loans in moderate-income tracts totaling \$4.6 million (24.2%), compared to the percentage of businesses in these tracts at 22.6% by volume and exceeded the proxy by dollar amount. The percentage of loans by volume and dollar amount exceeded the 2016 aggregate of all lenders at 19.3% and 21.8%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is excellent.

CTB made 39 loans in middle-income tracts totaling \$6.5 million. This represents 33.6% of small business loans by volume and 34.8% by dollar amount, compared to the percentage of businesses in these tracts at 36.3%. The 2016 aggregate of all lenders made 35.3% by volume and 37.2% by dollar amount in middle-income tracts.

CTB made 42 loans in upper-income tracts totaling \$7.2 million. This represents 36.2% of small business loans by volume and 38.1% by dollar amount, compared to the percentage of businesses in these tracts at 34.0%. The 2016 aggregate of all lenders made 36.6% by volume and 32.0% by dollar amount in upper-income tracts.

CTB made 110 small business loans totaling \$16.3 million in 2015. CTB made seven (6.4%) loans in a low-income tracts totaling \$1.1 million (7.0%), which was slightly below the percentage of businesses in these tracts at 7.1%. The percentage of loans by volume was below the 2015 aggregate of all lenders at 8.7% and slightly below the aggregate by dollar amount at 8.8%. Given CTB's performance compared to proxy and the aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is good.

CTB made 23 (20.9%) loans in moderate-income tracts totaling \$3.2 million (19.7%), which was slightly below the percentage of businesses in these tracts at 22.5%. The percentage of loans by volume exceeded the 2015 aggregate of all lenders at 19.8% and was slightly below by dollar amount at 22.6%. Given CTB's performance compared to proxy and aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is good.

CTB made 43 loans in middle-income tracts totaling \$8.5 million. This represents 39.1% of small business loans by volume and 51.9% by dollar amount, compared to the percentage of businesses in these tracts at 36.5%. The 2015 aggregate of all lenders made 35.3% by volume and 37.2% by dollar amount in middle-income tracts.

CTB made 37 loans in upper-income tracts totaling \$3.5 million. This represents 33.6% of small business loans by volume and 21.4% by dollar amount, compared to the percentage of businesses in these tracts at 34.0%. The 2015 aggregate of all lenders made 35.2% by volume and 31.1% by dollar amount in upper-income tracts.

Overall, CTB's performance was slightly below proxy and comparable to aggregate of all lenders; therefore, the geographic distribution of small business lending is good.

Community Development Loans

CTB originated or renewed five community development loans totaling approximately \$5.8 million during the evaluation period, as shown in the table below.

Purpose of CD Loan	#	\$
Economic Development	2	\$5,465,000
Affordable Housing	2	\$253,600
Community Services	1	\$62,300
Total	5	\$5,780,900

Community development lending represents 8.8% of CTB's total community development loans by volume and 9.9% by dollar amount compared to 12.1% of total deposits and 15.9% of total loans in this assessment area. This ranks as CTB's second highest percentage of community development lending during the evaluation period. There is significant competition for community

development loans and a number of large national banks in this market; CTB ranks seventh out of 31 institutions with 4.4% of the deposit market share. Therefore, CTB makes a relatively high level community development loans in the Lexington-Fayette assessment area.

The community development loans were made for a variety of purposes:

- To support the construction of 25 affordable single family housing units in Millersburg, Kentucky;
- To provide a line of credit to a non-profit affordable housing agency to update its facility to better serve its clients;
- To make a SBA 504 loan to help a small business construct a hotel in Mt. Sterling, Kentucky and create 16 new jobs for low- and moderate-income individuals;
- To provide working capital to small business incubator to help attract and retain small businesses in the area; and
- To provide working capital to a non-profit that provides legal aid to low-income individuals who cannot afford counsel.

All of the loans provided needed services or helped to stabilize the economy. These loans resulted in improved outcomes for low- and moderate-income individuals and families. Community contacts stressed the critical need for affordable housing, job creation, and social services targeted to lower-income individuals. Therefore, the community development loans made in Lexington-Fayette assessment area exhibit a good responsiveness to credit needs of lower income individuals and very small businesses.

Flexible Lending Programs

CTB provided direct subsidies totaling \$20,000 to four low- or moderate-income individuals through the FHLB of Cincinnati's Welcome Home down payment assistance program in this assessment area.

CTB partnered with a local affordable housing agency to make 38 small loans totaling \$1.1 million to low- or moderate-income individuals to build safe and affordable homes.

CTB originated 60 SBA 7(a) loans totaling \$8.1 million. These loans provide funds to start-ups and existing small businesses with access to capital with more flexible repayment terms than conventional commercial financing for multiple purposes. CTB also originated five SBA 7(a) loans totaling \$263,400 that benefited small businesses in counties within the Lexington-Fayette assessment area, but outside CTB's delineated assessment area.

CTB makes use of flexible lending practices in serving the credit needs of the Lexington-Fayette assessment area. These programs are designed to improve affordable housing for low- and moderate-income individuals and provide small businesses with access to capital to help existing companies retain and expand their businesses or attract new small businesses to the area. Further, community contacts noted affordable housing as a significant need in this area. Therefore, the impact of these programs on low- and moderate-income geographies and to low- and moderate-income borrowers and small businesses enhanced CTB's overall lending test performance.

Investment Test

CTB obtained 48 new investments totaling approximately \$8.9 million, representing 35.8% of qualified investments by dollar amount. These investments supported affordable housing initiatives primarily through a CRA Qualified Investment Fund that invests in mortgage pools guaranteed by various government mortgage agencies and a LIHTC. These investments supported 239 Section 8 eligible rental units and 44 single-family homes for low- and moderate-income families and individuals, including the elderly and disabled and 40 rental units of facilitated by a LIHTC. In addition to affordable housing, one of the mortgage pool investments also included access to a food pantry for the low-income seniors living in that facility. These investments provided increased access to affordable housing and provided access to food commodities which resulted in improved outcomes for low- and moderate-income individuals and families. Community contacts stressed the critical need for affordable housing in this assessment area; therefore, qualified investments exhibit an excellent responsiveness to credit and community development needs across the assessment area.

CTB also made 73 donations totaling \$308,855, representing 20.5% of total dollar volume of donations. This ranks as CTB's second highest percentage of donations made during this evaluation period. Donations in the Lexington-Fayette assessment area supported a wide array of organizations and non-profits to fund various aspects of affordable housing, economic development, a multitude of services targeted to lower-income individuals and families, including but not limited to supported a regional healthcare provider who provides services to all patients regardless of their ability to pay, a non-profit with an employment bus that takes citizens to work during the hours the regular bus is not in service, inmate recidivism reduction programs, shelters for persons affected by extreme poverty and homelessness, and financial literacy. Community contacts stressed the critical need for affordable housing, home improvements, and drug treatment and wraparound social services targeted to lower-income individuals and families as a result of the opioid crisis. The following table reflects the total number community development donations by purpose, number, and dollar amount.

Purpose of CD Donation	#	\$
Community Services	53	\$217,761
Revitalization/Stabilization	2	\$2,000
Economic Development	7	\$51,000
Affordable Housing	11	\$38,124
Total	73	\$308,855

Overall, CTB made 20.8% of its total qualified community development investments and donations in Lexington-Fayette assessment area, which is greater than the percentage of total deposits at 12.1%, total loans at 15.9%, and the total percentage of branch offices at 13.6%. This is CTB's second highest percentage of qualified community development investment activity. Therefore, CTB made an excellent level of qualified community development investments in the Lexington-Fayette assessment area, particularly those not routinely provided by private investors, often in a leadership position.

Service Test

CTB's retail services are accessible and CTB provides an adequate level of community development services.

Retail Services

CTB has not opened or closed any offices since the previous evaluation; therefore, CTB's record of opening and closing offices has not adversely affected the accessibility of its delivery systems, in low- or moderate-income geographies and to low- and moderate-income households. CTB's delivery services are accessible to portions of CTB's geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including moderate-income geographies or to low- and moderate-income households, and are consistent with the services and hours discussed in the "Institution" assessment.

CTB has eleven branch offices with cash-only ATMs with one in low-, two in moderate-, five in middle-, and three in upper-income tracts. Nine branches provide drive-through services and eight branches provide extended and weekend hours of service, while two branches provide extended hours of service. CTB also has a stand-alone cash-only ATM located at St. Joseph Hospital in Lexington, Kentucky. CTB's branch offices in this assessment area represent 13.6% of its branch offices.

The following table illustrates the percentage of branch offices in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts in 2017 based on 2015 census data. CTB had no branch offices in low-, four in moderate- and four in middle-, and three in upper-income census tracts in 2015/2016 based on 2010 census data.

Geographic Distribution of Branches

Analysis Year: 2017

Exam: Community Trust Bank 2019

Lexington Fayette KY MSA #30460 2017

Tract Income Levels	BRANCHES							DEMOGRAPHICS				
	Total Branches		Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses	
	#	%	#	#	#	#	#	#	%	%	%	
Low	Total	1	9.1%	0	0	1	1	1				
	DTO	0		0	0	0			11	9.6%	9.1%	6.3%
	LS	0		0	0							
Moderate	Total	2	18.2%	0	0	1	2	1				
	DTO	0		0	0	0			23	20.2%	22.5%	16.9%
	LS	0		0	0							
Middle	Total	5	45.5%	0	0	4	4	3				
	DTO	0		0	0	0			46	40.4%	39.2%	43.9%
	LS	0		0	0							
Upper	Total	3	27.3%	0	0	3	3	3				
	DTO	0		0	0	0			34	29.8%	29.2%	32.9%
	LS	0		0	0							
Unknown	Total	0	0.0%	0	0	0	0	0				
	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
<i>Totals</i>	Total	11	100.0%	0	0	9	10	8				
	DTO	0		0	0	0			114	100.0%	100.0%	100.0%
	LS	0		0	0							

DTO - Drive Thru Only

LS - Limited Service

Shaded rows indicate totals; unshaded rows are a subset of shaded rows

*Closed branches are only included in the "Closed" column and are not included in any other totals

LPOs not included in totals.

The distribution of branches was comparable to the percentage of low-income census tracts, households, and total businesses in these tracts. The distribution of branches was slightly less than the percentage of moderate-income census tracts, households, and exceeded total businesses in these tracts. Therefore, branch distribution in low- and moderate-income tracts is considered good.

Community Development Services

CTB provides an adequate level of community development services in this assessment area. During the evaluation period, 14 employees provided 68 services totaling 263 hours community development services to 20 different organizations that provide a multitude of services throughout the assessment area. This represents 5.0% of all community development service hours, which is less than the percentage of total deposits at 12.1% and the percentage of branch offices at 13.6%. In addition, the community development service hours provided in this assessment area equate to 0.13 ANP.

Community Services			Economic Development			Affordable Housing		
# Services	# Hours	# Orgs	# Services	# Hours	# Orgs	# Services	# Hours	# Orgs
49	219	16	6	28	3	13	16	1

Employees provided financial expertise through leadership positions in multiple community organizations that offer services to low- and moderate-income individuals and families; and

promote affordable housing, community and economic development. Community development services include 187 hours serving on boards and committees, 72 hours providing technical expertise, and four hours providing financial literacy education.

STATE OF TENNESSEE

CRA RATING for State of Tennessee: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: Outstanding

The service test is rated: Low Satisfactory

The major factors supporting this rating include:

- A good responsiveness to credit needs;
- An excellent distribution of loans among borrowers of different income levels;
- An excellent geographic distribution of loans throughout the assessment area;
- An excellent record of serving the credit needs of low-income individuals and areas and very small businesses exhibited;
- An adequate level of community development loans;
- An excellent level of qualified community development investments and grants;
- Often in a leadership position providing community development investments and grants;
- Retail delivery systems are reasonably accessible to all geographies and individuals of different income levels;
- A record of opening and closing banking centers has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- An adequate level in providing community development services.

SCOPE OF EVALUATION

A full-scope review was conducted for the Knoxville TN MSA, which represents CTB's entire banking operations for Tennessee. The time period for this assessment area is consistent with the scope discussed in the institution section of this report. However, due to limited volumes HMDA-reportable loan products were combined in order to conduct a meaningful analysis and CRA-reportable small business loans were not considered.

Lending activity accounted for 4.5% of the CTB's total lending activity and deposits accounted for 5.0% of the CTB's total deposits. As of June 30, 2018, CTB ranked 110th among 189 insured institutions and had a deposit market share of 0.1% in Tennessee.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE
KNOXVILLE TN MSA #28940**

The Knoxville, Tennessee MSA (Knoxville) consists of entireties of Anderson and Campbell counties. CTB’s delineated assessment area excludes Blount, Grainger, Knox, Loudon, Morgan, Roane, and Union counties. Due to changes in median family income levels resulting from changes in U.S. census data, this assessment area was comprised of the following tracts for this analysis:

Tract Income Level	2015/2016	2017
	Number of Tracts	Number of Tracts
Low	1	0
Moderate	12	14
Middle	11	10
Upper	4	4
Unknown	1	1
Total	29	29

This assessment area lost one low-income census tract and lost one middle-income census tract and gained two moderate-income tracts. There were no changes to the number of upper- or unknown-income tracts.

As of June 30, 2018, CTB ranked third out of 18 institutions with 11.1% of the deposit market share. Regions Bank and SunTrust Bank ranked first with 18.9% and 11.8% of the deposit market share. Deposits in this assessment area accounted for 5.0% of CTB’s total deposits and ranks fourth in deposits within CTB’s CRA footprint.

From January 1, 2015 through December 31, 2017 CTB originated 242 HMDA-reportable loans and 78 CRA-reportable loans, which represents 4.8% and 4.6% of the total loans originated during the evaluation period. These are the fourth smallest HMDA and CRA markets for loans originated during the evaluation period.

In 2017, CTB ranked ninth among 219 HMDA reporters in the assessment area. The top two HMDA lenders in the assessment area were Mortgage Investors Group and ORNL Federal Credit Union. CTB ranked 12th of 64 CRA reporters in the assessment area in 2017. The top five CRA lenders in the assessment area were American Express, Citibank, N.A., Capital One, SunTrust Bank and Bank of America, National Association. These lenders tend to be issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

One community contact interview was conducted to provide additional information regarding the assessment area. The contact, representing a non-profit organization that helps make homeownership achievable for lower-income individuals, stated the agency provide a variety of

programs including homebuyer education, financial literacy education, and default counseling. The agency partners with public and private organizations to help provide affordable housing opportunities for residents in Eastern Tennessee. Housing stock is generally older in Anderson County (i.e., over 43 years) and rehabilitating these homes for resale can be cost-prohibitive for a majority of homeowners. There is also a scarce supply of buildable land in the county because the lots are being purchased by large developers who are building higher-end housings. As a result, affordable housing (single-family and multi-family) options are also limited. The average price of a house has increased to over \$135,000 while wages have remained stagnant for lower-skilled workers. Even though unemployment is low and housing is considered affordable, a high percentage of families are struggling to pay rent. For these reasons, there are opportunities for banks to be more involved in supporting affordable housing-related programs and initiatives.

Population Characteristics

According to 2015 census data, the population in the assessment area was 115,606 of which 44.1% live in moderate-income tracts. In addition, 78.9% of the population was 18 years of age or older, the legal age to enter into a contract. The population age 65 and over was 18.5% in Anderson County and 18.9% in Campbell County compared to 14.6% in Tennessee. The larger senior population means this assessment area probably has a smaller working- and consumer-age population and reduced economic activity. As indicated in the table below, the majority of the area’s population resides in Anderson County and its population increased by 1.4% between 2010 and 2018. The table also shows the area’s estimated population change from 2010 to 2018.

County	Population Change				
	2010 Population	2015 Population	Percent Change Between 2010 to 2018	2018 Population	Percent Change Between 2010 to 2018
Anderson County	75,129	75,459	0.4%	76,482	1.4%
Campbell County	40,716	39,687	-2.5%	39,583	-0.3%
Tennessee	6,346,105	6,590,808	3.9%	6,770,010	2.7%

Source: U.S. Census Bureau- American Fact Finder - 2017 Populations and 2018 Population Estimates

Clinton (Anderson County) is the most populous city in this assessment area with 10,028 residents; its population increased 6.0% between 2010 and 2018. LaFollette is the most populous city in Campbell County with 6,737 residents; its population decreased by 9.9% between 2010 and 2018.²⁵

Income Characteristics

The 2015 median family income (\$49,286) in the assessment area was less than Tennessee median family income (\$56,110). As shown below, the assessment area median family income increased by 3.9% between 2017 and 2018.

²⁵ U.S. Census-QuickFacts:
<https://www.census.gov/quickfacts/fact/table/lafollettecitennessee.clintoncitytennessee,US/PST045219>

**Borrower Income Levels
Knoxville, TN - MSA**

HUD Estimated Median Family Income		Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2017	\$61,600	0	-	\$30,799	\$30,800	-	\$49,279	\$49,280	-	\$73,919	\$73,920	-	& above
2018	\$64,100	0	-	\$32,049	\$32,050	-	\$51,279	\$51,280	-	\$76,919	\$76,920	-	& above

The counties in this assessment area are in rural Appalachian Tennessee and had higher poverty rates than Tennessee between 2015 through 2017. In addition, Campbell County had poverty rates greater than 20.0% in 2015 and 2016. However, area poverty rates appear to illustrate an improving economic trend among rural residents in Appalachian Tennessee.

Poverty Rates					
County	2015	2016	Percentage Point Change 2015-2016	2017	Percentage Point Change 2016-2017
Anderson County	19.7%	14.4%	-5.3	15.3%	0.9
Campbell County	26.2%	24.1%	-2.1	19.2%	-4.9
Tennessee	16.7%	15.8%	-0.9	15.0%	-0.8
U. S.	14.7%	14.0%	-0.7	13.4%	-0.6
<i>Source: U.S. Census Bureau</i>					

According to 2015 census data, 19.2% of the 46,607 households in this assessment area are below the poverty level, 2.5% are receiving public assistance, and 12.9% have rent costs greater than 30.0% of their monthly income.

Housing Characteristics

According to the 2015 census data, there are 55,023 housing units and 30,545 families in the assessment area. From an income perspective, 46.2% of the housing units and 43.7% of families are in the assessment area’s moderate-income tracts. In addition, 50.3% of the housing units in moderate-income tracts are owner-occupied, 31.8% are rental, and 17.9% are vacant. Therefore, there appears to be opportunities for CTB to make home purchase loans and provide various aspects of affordable housing in these tracts.

The 2015 census data shows the median age of housing stock was 45 years old, and 19.4% of assessment area’s 55,023 housing units are at least 65 years old (built before 1950) with nearly a quarter (23.3%) of housing units in Anderson County are over 65 years old. The median age of housing stock in the assessment area is at least 12 years older than in Tennessee. This indicates there are opportunities for CTB to make home improvement loans. The median housing value in Anderson County was \$131,200 with an affordability ratio of 32.7. The median housing value in Campbell County was \$89,400 with an affordability ratio of 35.8. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. As indicated in the table below, between 2010 and 2015 median housing values increased considerably in Anderson County and

only increased slightly in Campbell County. During this same time period housing became much less affordable in Anderson County most because median family income did not keep pace with home price growth; a community contact noted the same concern. Housing affordability remained stable in Campbell County. In addition, median gross rents increased across the assessment area, particularly in Campbell County. The table below presents housing characteristics from the census data between 2010 and 2015 in the assessment area and Tennessee. The table below presents housing characteristics from the census data between 2010 and 2015 in the assessment area and Tennessee.

Housing Costs Change								
County	Median Housing Value		Percent Change	2010 Affordability Ratio	2015 Affordability Ratio	Median Gross Rent		Percent Change
	2010	2015				2010	2015	
Anderson County	116,400	131,200	12.7%	38.4	32.7	612	685	11.9%
Campbell County	86,400	89,400	3.5%	35.5	35.8	447	556	24.4%
Tennessee	134,100	142,100	6.0%	32.3	31.8	678	764	12.7%

Source: U.S. Census Bureau

According to 2015 census data, 34.6% of renters in the assessment area have rent costs more than \$700 a month and nearly 41.3% of units for rent (14,521) have renters who are considered to be cost burdened or have rent costs greater than 30.0% of their monthly income. Increasing rental costs may make it more difficult for potential first-time homebuyers to save enough to make a sufficient down payment in the rising interest rate environment.

Building permits are a leading indicator of future activity in the construction sector. As indicated in the table below, the increased percentage of building permits was much higher in the assessment area compared to statewide and national trends.²⁶

Building Permits					
County	2016	2017	Percent of Change 2016-2017	2018	Percent of Change 2017 - 2018
Anderson County	124	141	13.7%	196	39.0%
Campbell County	211	237	12.3%	264	11.4%
Tennessee	36,157	37,912	4.9%	37,169	-2.0%
U. S.	1,206,642	1,281,977	6.2%	1,328,827	3.7%

Source: U.S. Bureau of Labor Statistics

The increase in the number of permits could indicate an increasing demand for residential real estate mortgage loans during this evaluation period.

²⁶ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

Labor, Employment, and Economic Characteristics

According to ARC,²⁷ Anderson and Campbell counties are in rural Appalachian Tennessee. Anderson County’s economic status was considered to be transitional and Campbell County’s was considered to be distressed as of fiscal year 2017.

According to Dun & Bradstreet, the majority of businesses (88.2%) in the assessment area have revenue under \$1 million. There are approximately 55,011 paid employees in this assessment area who are working in either the manufacturing, other or government according to Tennessee Department of Economic and Community Development.²⁸ By percentage of employees, the largest job category in the assessment area is local manufacturing, followed by other service government, health care and social assistance and retail trade.

The table below illustrates the average unemployment rates related to this assessment area.

Unemployment Rates
Assessment Area: Knoxville, TN MSA #28940

Area	Years - Annualized	
	2017	2018
Anderson County	4.0	3.8
Campbell County	5.2	4.8
Knoxville, TN MSA #28940	3.6	3.3
Tennessee	3.8	3.5
National	4.4	3.9

Not Seasonally Adjusted

Data extracted on October 3, 2019

While unemployment rates across the assessment area declined between 2017 and 2018, assessment area unemployment rates were consistently higher than the unemployment rates for Tennessee and the nation.

²⁷ Appalachian Regional Commission (ARC) – County Economic Status, FY 2017:
https://www.arc.gov/reports/region_report.asp?FIPS=21999&REPORT_ID=62

²⁸ <https://tnced.com/county-profiles/>

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KNOXVILLE, TN MSA #28940

Lending Test

CTB's performance relative to the lending test in the assessment area is rated "High Satisfactory."

CTB's performance under the lending test in this assessment area is good. CTB's lending activity demonstrates a good responsiveness to the credit needs of the community. CTB makes an adequate level of community development loans. CTB originated three community development loans totaling \$1.5 million. CTB has an excellent distribution among borrowers of different income levels and an excellent geographic distribution of loans and a moderate level of lending gaps. CTB exhibits an excellent record of serving the credit needs of highly economically disadvantaged areas in its assessment area and low-income individuals.

Borrower distribution received greater weight than geographic distribution based on the percentage of families by family income compared to the percentage of low- and moderate-income geographies in this assessment area. Home purchase, refinance, and home improvement loans were combined in order to conduct a meaningful evaluation and are referred to as HMDA loans throughout the evaluation. CRA-reportable small business loans were not considered. Details of CTB's HMDA lending and information regarding peer lending is in Appendices D, E and F.

Lending Activity

Lending levels reflect a good responsiveness to the credit needs in the assessment area. The percentage of CTB's lending in the Knoxville, TN MSA is 4.5%, while the percentage of total deposits is greater at 5.0%. CTB originated 242 HMDA loans and 78 CRA loans and had a moderate level of lending gaps in this assessment area during the evaluation period. Lastly, no substantial concentration of loans was identified in excluded counties in this MSA.

Distribution by Borrower Income

CTB's overall distribution among borrowers of different income levels is excellent.

CTB made 85 HMDA loans totaling \$12.7 million in 2017. Also, there was two (2.4%) HMDA loans totaling \$529,000 (4.1%) made to borrowers with unknown income designations, compared to the 2017 aggregate of all lenders that made 20.8% by volume and 24.8% by dollar amount.

In 2017 CTB made ten (11.8%) HMDA loans totaling \$457,000 (3.6%) to low-income borrowers, which was well below the percentage of families at 29.2%. The percentage of loans by volume exceeded the 2017 aggregate at 11.2% and was below by dollar amount at 5.3%. Given the limited loan volume and CTB's performance compared to the proxy and aggregate of all lenders, the borrower distribution of HMDA loans to low-income borrowers is good.

CTB made 17 (20.0%) HMDA loans totaling \$1.8 million (13.7%) to moderate-income borrowers, which exceeded the percentage of families at 19.1% by loan volume and was below by dollar amount. The percentage of loans by volume and dollar amount exceeded the 2017 aggregate at

19.8% and 13.4%, respectively. Given the limited loan volume and CTB's strong performance compared to proxy by volume and aggregate of all lenders, the borrower distribution of HMDA loans to moderate-income borrowers is excellent.

CTB made 17 (20.0%) HMDA loans totaling \$1.8 million (14.3%) to middle-income borrowers, compared to the percentage of families at 18.7% by volume and was below by dollar amount. The 2017 aggregate of all lenders made 17.7% by volume and 15.4% by dollar amount to middle-income borrowers.

CTB made 39 (45.9%) HMDA loans totaling \$8.2 million (64.3%) to upper-income borrowers, compared to the percentage of families at 39.3% by loan volume and dollar amount. The 2017 aggregate of all lenders made 30.6% by volume and 41.1% by dollar amount to upper-income borrowers.

CTB made 80 HMDA loans totaling \$10.3 million in 2016. Also, there was three (3.8%) HMDA loans totaling \$620,000 (6.0%) made to borrowers with unknown income designations, compared to the 2016 aggregate of all lenders that made 20.5% by volume and 26.9% by dollar amount.

In 2016 CTB made 11 (13.8%) HMDA loans totaling \$514,000 (5.0%) to low-income borrowers, which was well below the percentage of families at 27.9%. The percentage of loans by volume and dollar amount exceeded the 2016 aggregate at 10.6% and 4.6%, respectively. Given CTB's strong performance compared to aggregate of all lenders, the borrower distribution of HMDA loans to low-income borrowers is good.

CTB made 16 (20.0%) HMDA loans totaling \$1.6 million (15.8%) to moderate-income borrowers, which exceeded the percentage of families at 17.4% by volume and was slightly below by dollar amount. The percentage of loans by volume and dollar amount exceeded the 2016 aggregate at 18.6% and 12.6%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the borrower distribution of HMDA loans to moderate-income borrowers is excellent.

CTB made 21 (26.3%) HMDA loans to middle-income borrowers totaling \$2.6 million (25.4%), compared to the percentage of families at 21.5%. The 2016 aggregate made 19.3% by volume and 15.4% by dollar amount to middle-income borrowers.

CTB made 29 (36.3%) HMDA loans totaling \$5.0 million (47.8%) to upper-income borrowers, compared to the percentage of families at 33.2%. The 2016 aggregate made 30.9% by volume and 40.5% by dollar amount to upper-income borrowers.

CTB made 77 HMDA loans totaling \$8.7 million in 2015. Also, there was one (1.3%) HMDA loan totaling \$16,000 (0.2%) made to a borrower with an unknown income designation, compared to the 2015 aggregate of all lenders that made 19.2% by volume and 21.4% by dollar amount.

In 2015 CTB made 12 (15.6%) HMDA loans totaling \$556,000 (6.4%) to low-income borrowers, which was below the percentage of families at 27.9%. The percentage of loans by volume and dollar amount substantially exceeded the 2015 aggregate at 10.5% and 4.6%, respectively. Given

CTB’s strong performance compared to the aggregate of all lenders, the borrower distribution of HMDA loans to low-income borrowers is excellent. CTB was able to effectively serve low-income borrowers despite a lack of affordable housing, as noted by the community contact.

CTB made 18 (23.4%) HMDA loans totaling \$1.3 million (15.2%) to moderate-income borrowers, which exceeded the percentage of families at 17.4% by volume and was slightly below by dollar amount. The percentage of loans by volume and dollar amount exceeded the 2015 aggregate at 18.0% and 12.8%, respectively. Given CTB’s strong performance compared to proxy and aggregate of all lenders, the borrower distribution of HMDA loans to moderate-income borrowers is excellent.

CTB made 21 (27.3%) HMDA loans to middle-income borrowers totaling \$2.6 million (29.5%), compared to the percentage of families at 21.5%. The 2015 aggregate of all lenders made 19.5% by volume and 16.4% by dollar amount to middle-income borrowers.

CTB made 25 (32.5%) HMDA loans totaling \$4.2 million (48.7%) to upper-income borrowers, compared to the percentage of families at 33.2%. The 2015 aggregate of all lenders made 32.8% by volume and 44.8% by dollar amount to upper-income borrowers.

Overall CTB’s HMDA performance varied compared to the percentage of families and generally exceeded the aggregate of all lenders; therefore, borrower distribution of HMDA lending is excellent. Although HMDA lending is somewhat limited in this assessment area, CTB was able to lend to low- and moderate-income borrowers even with challenges related to affordable housing.

Geographic Distribution of Loans

CTB’s overall distribution of lending among geographies is excellent. The following gaps in lending were noted in the assessment area.

Tract Income Level	Percentage of Lending Penetration		
	2015	2016	2017
Low	100.0%	100.0%	N/A
Moderate	66.7%	58.3%	78.6%
Middle	81.8%	72.7%	70.0%
Upper	50.0%	72.7%	70.0%
Unknown	0.0%	50.0%	50.0%
Total	69.0%	62.1%	69.0%

Overall, lending gaps are moderate. In 2017 the highest penetration rate was in moderate-income census tracts; also there were no designated low-income tracts in the assessment area.

CTB made 85 HMDA loans totaling \$12.8 million in 2017. CTB made 55 (64.7%) HMDA loans totaling \$7.9 million (61.7%) in moderate-income tracts, which substantially exceeded the percentage of owner-occupied units in these tracts at 39.8%. The percentage of loans by volume and dollar amount substantially exceeded the 2017 aggregate at 38.3% and 34.8%, respectively.

Given CTB's strong performance compared to proxy and the aggregate of all lenders, the geographic distribution of HMDA loans in moderate-income tracts is excellent.

CTB made 27 (31.8%) HMDA loans totaling \$4.4 million (34.4%) in middle-income tracts, compared to the percentage of owner-occupied units in these tracts at 45.7%. The 2017 aggregate of all lenders made 46.2% by volume and 43.4% by dollar amount in middle-income tracts.

CTB made three (3.5%) HMDA loans totaling \$503,000 (3.9%) in upper-income tracts, compared to the percentage of owner-occupied units in these tracts at 14.5%. The 2017 aggregate of all lenders made 15.4% by volume and 21.8% by dollar amount in upper-income tracts.

CTB made 80 HMDA loans totaling \$10.4 million in 2016. CTB made four (5.0%) HMDA loans totaling \$392,000 (3.8%) in the low-income tract, which substantially exceeded the percentage of owner-occupied units in these tracts was at 2.8%. The percentage of loans by volume and dollar amount substantially exceeded the 2016 aggregate of all lenders at 3.0% and 1.6%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the geographic distribution of HMDA loans in moderate-income tracts is excellent.

CTB made 26 (32.5%) HMDA loans totaling \$2.1 million (19.9%) in moderate-income tracts, which was slightly below the percentage of owner-occupied units in these tracts at 33.7% by volume and below by dollar amount. The percentage of loans by volume exceeded the 2016 aggregate of all lenders at 29.2% and was below by dollar amount at 30.7%. Given CTB's performance compared to proxy and aggregate of all lenders, the geographic distribution of HMDA loans in moderate-income tracts is good.

CTB made 44 (55.0%) HMDA loans totaling \$6.9 million (66.7%) in middle-income tracts, compared to the percentage of owner-occupied units in these tracts at 49.7%. The 2016 aggregate of all lenders made 53.4% by volume and 50.5% by dollar amount in middle-income tracts.

CTB made six (7.5%) HMDA loans totaling \$992,000 (9.6%) in upper-income tracts, compared to the percentage of owner-occupied units in these tracts at 13.8%. The 2016 aggregate of all lenders made 14.3% by volume and 17.3% by dollar amount in upper-income tracts.

CTB made 77 HMDA loans totaling \$8.7 million in 2015. CTB made two (2.6%) HMDA loans totaling \$47,000 (0.5%) in the low-income tract, which was slightly below the percentage of owner-occupied units in these tracts at 2.8% by volume and substantially below by dollar amount. The percentage of loans by volume was slightly below the 2015 aggregate at 2.8% and well below by dollar amount at 1.5%. Given CTB's performance compared to proxy and aggregate of all lenders, the geographic distribution of HMDA loans in moderate-income tracts is good.

CTB made 31 (40.3%) HMDA loans totaling \$3.3 million (37.9%) in the moderate-income tract, which exceeded the percentage of owner-occupied units in these tracts at 33.7%. The percentage of loans by volume and dollar amount substantially exceeded the 2015 aggregate at 28.5% and 25.8%, respectively. Given CTB's strong performance compared to proxy and the aggregate of all lenders, the geographic distribution of HMDA loans in moderate-income tracts is excellent.

CTB made 42 (54.5%) HMDA loans totaling \$5.0 million (57.5%) in middle-income tracts, compared to the percentage of owner-occupied units in these tracts at 49.7%. The 2015 aggregate of all lenders made 53.2% by volume and 53.2% by dollar amount in middle-income tracts.

CTB made two (2.6%) HMDA loans totaling \$353,000 (4.0%) in upper-income tracts, compared to the percentage of owner-occupied units in these tracts at 13.8%. The 2015 aggregate of all lenders made 15.5% by volume and 19.5% by dollar amount in upper-income tracts.

Overall, CTB’s HMDA lending performance exceeded or was comparable to proxy and generally exceeded the aggregate of all lenders particularly in moderate-income tracts; therefore, geographic distribution of HMDA lending is excellent.

Community Development Loans

CTB originated or renewed three community development loans totaling approximately \$1.5 million during the evaluation period, as shown in the table below.

Purpose of CD Loan	#	\$
Economic Development	1	\$1,390,339
Community Services	2	\$135,000
Total	3	\$1,525,339

Community development lending represents 5.3% of CTB’s total community development loans by volume and 2.6% by dollar amount compared to 5.0% of total deposits and 4.5% of total loans in this assessment area. This ranks as CTB’s third highest percentage of community development lending during the evaluation period. There is significant competition for community development loans and a number of large national banks in this market; CTB ranks third of 18 institutions with 11.1% of the deposit market share. Therefore, CTB makes an adequate level community development loans in the Knoxville assessment area.

The community development loans were made for a variety of purposes:

- To help a small business startup through a SBA 504 loan to retain nine jobs and create nine new jobs for low- and moderate-income individuals; and
- To provide a loan and revolving line of credit to non-profit open a thrift store and purchase a vehicle. Income from the thrift store is used to fund the non-profit’s mission. This non-profit provides low- and moderate-income women in recovery with transitional housing, drug rehabilitation services, education and employment training, job placement services, financial literacy training, and low cost medical and dental care. The van is used to transport the women to training classes, jobs, and medical and counseling appointments.

This assessment area has higher poverty and unemployment rates than Tennessee and these loans helped to provide needed services or stabilize the economy and resulted in improved outcomes for low- and moderate-income individuals and families. Therefore, the community development loans made in Knoxville assessment area exhibit an adequate responsiveness to credit needs of lower income individuals and very small businesses.

Lastly, consideration was given to 12 qualified community development loans totaling \$19.1

million that benefited counties within Tennessee but outside CTB's delineated assessment areas. These loans supported ten SBA 504 loans to a small business that helped to create/retain 112 permanent full-time jobs and 365 permanent part-time jobs with a majority for low- and moderate-income individuals and two loans to two small businesses that helped to create/retain about 191 jobs in moderate-income areas.

Investment Test

CTB's performance relative to the investment test in the assessment area is rated "Outstanding."

CTB obtained 22 new investments totaling approximately \$5.0 million, representing 11.8% of qualified investments by dollar amount. These investments supported affordable housing initiatives through a CRA Qualified Investment Fund that invests in mortgage pools guaranteed by various government mortgage agencies. These investments supported 88 rental units associated with a LIHTC issued by the Tennessee Housing Development Agency and 21 single-family homes for low- and moderate-income families and families. A community contact indicated the need for banks to support affordable housing-related programs and initiatives across the state; therefore, qualified investments exhibit an excellent responsiveness to credit and community development needs across the assessment area.

Since CTB was considered responsive to the credit and community development needs; investments that do not support organizations or activities with a purpose, mandate, or function of serving CTB's geographies or individuals located within Tennessee were considered to positively impact state performance. Consideration was given to a qualified community development investment which was part of the CRA Qualified Investment Fund. This investment totaling \$99,400 supported the purchase of a single-family home for a low- or moderate-income individual.

CTB made two donations totaling \$600 representing less than 0.1% of total dollar volume of donations. This ranks as CTB's lowest percentage of donations made during this evaluation period. These donations supported two non-profit organizations that provide a multitude of services to low- and moderate-income individuals and families.

Lastly, consideration was given to four donations totaling \$2,100 that benefitted counties within the state but outside CTB's delineated assessment areas within Tennessee. These donations supported an organization that provides college scholarship assistance to qualified low- and moderate-income high school students and another organization that provides health services (e.g., medical and dental) to low- and moderate-income individuals and families.

Overall, CTB made 11.4% of its total qualified community development investments and donations in the Knoxville assessment area, which is greater than the percentage of total deposits at 5.0%, total loans at 4.5%, and branch offices at 4.9%. This is CTB's fourth highest percentage of qualified community development investment activity. Therefore, CTB made an excellent level of qualified community development investments in the Knoxville assessment area, particularly those not routinely provided by private investors, often in a leadership position.

Service Test

CTB's performance relative to the service test in the assessment area is rated "Low Satisfactory." Retail services are reasonably accessible and CTB provides an adequate level of community development services.

Retail Services

CTB has not opened or closed any offices since the previous evaluation; therefore, CTB's record of opening and closing offices has not adversely affected the accessibility of its delivery systems, in low- and moderate-income geographies and to low- and moderate-income households. In October 2018 CTB consolidated a branch in LaFollette into a nearby location in a middle-income tract. CTB's delivery services are reasonably accessible to portions of CTB's geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or to low- and moderate-income households, and are consistent with the services and hours discussed in the "Institution" assessment.

During this evaluation period, CTB had four branch offices with cash-only ATMs that provide drive-through services and extended hours of service. CTB's branch offices in this assessment area represent 4.9% of its branch offices. In 2017 CTB closed two grocery store stand-alone cash-only ATMs in LaFollette and Oak Ridge.

The following table illustrates the percentage of branch offices in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts in 2017 based on 2015 census data. The branch office in the moderate-income tract in 2017 was in a low-income tract in 2015/2016 based on 2010 census data.

Geographic Distribution of Branches

Analysis Year: 2017

Exam: Community Trust Bank 2019
Knoxville TN MSA #28940 2017

Tract Income Levels	BRANCHES							DEMOGRAPHICS				
	Total Branches		Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses	
	#	%	#	#	#	#	#	#	%	%	%	
Low	Total	0	0.0%	0	0	0	0	0				
	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
Moderate	Total	1	25.0%	0	0	1	1	0				
	DTO	0		0	0	0			14	48.3%	44.7%	38.2%
	LS	0		0	0							
Middle	Total	3	75.0%	0	1	3	3	0				
	DTO	0		0	0	0			10	34.5%	41.5%	38.8%
	LS	0		0	0							
Upper	Total	0	0.0%	0	0	0	0	0				
	DTO	0		0	0	0			4	13.8%	13.8%	13.1%
	LS	0		0	0							
Unknown	Total	0	0.0%	0	0	0	0	0				
	DTO	0		0	0	0			1	3.4%	0.0%	3.9%
	LS	0		0	0							
<i>Totals</i>	Total	4	100.0%	0	1	4	4	0				
	DTO	0		0	0	0			29	100.0%	100.0%	100.0%
	LS	0		0	0							

DTO - Drive Thru Only

LS - Limited Service

Shaded rows indicate totals; unshaded rows are a subset of shaded rows

*Closed branches are only included in the "Closed" columns and are not included in any other totals (**Represents consolidated branch in 2018**)

LPOs not included in totals.

The distribution of branches and full-service ATMs was less than the percentage of moderate-income census tracts, households, and total businesses in these tracts; therefore, branch distribution in low- and moderate-income tracts is considered adequate during this evaluation period.

Community Development Services

CTB provides an adequate level of community development services in this assessment area. During the evaluation period, two employees gave 148 hours serving as board members for two organizations that support affordable housing and community services targeted toward low- and moderate-income children. This represents 3.0% of all community development service hours, which is less than the percentage of total deposits at 5.0% and the percentage of branch offices at 4.9%.

STATE OF WEST VIRGINIA

CRA RATING for State of West Virginia:²⁹ Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: High Satisfactory

The service test is rated: Low Satisfactory

The major factors supporting this rating include:

- An adequate responsiveness to credit needs;
- An excellent distribution of loans among borrowers of different income levels;
- A good geographic distribution of loans throughout the assessment area;
- A good record of serving the credit needs of low-income individuals and areas and very small businesses exhibited;
- Makes few, if any community development loans;
- Makes limited use of flexible lending practices in serving assessment area's credit needs;
- A relatively high level of qualified community development investments and grants;
- Occasionally in a leadership position providing community development investments and grants;
- Retail delivery systems are reasonably accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A limited level of providing community development services.

SCOPE OF EVALUATION

A full-scope review was conducted for Nonmetropolitan West Virginia, which represents CTB's entire banking operations for West Virginia. The time period for this assessment area is consistent with the scope discussed in the institution section of this report. However, due to limited volumes HMDA-reportable loan products were combined in order to conduct a meaningful analysis and CRA-reportable small business loans were not considered.

²⁹ For institutions with branches in two or more states in a multi-state metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multi-state metropolitan area. Refer to the multi-state metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending activity accounted for 3.1% of the CTB’s total lending activity and deposits accounted for 4.4% of the CTB’s total deposits. As of June 30, 2018, CTB ranked 21st among 73 insured institutions and has a deposit market share of 0.8% in West Virginia.

NONMETROPOLITAN AREA
(Full-scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN NONMETROPOLITAN WEST VIRGINIA

Nonmetropolitan West Virginia consists of entireties of Mingo and Nicholas counties. Due to changes in median family income levels resulting from changes in U.S. census data, this assessment area was comprised of the following tracts for this analysis:

Tract Income Level	2015/2016	2017
	Number of Tracts	Number of Tracts
Moderate	1	3
Middle	13	10
Upper	0	1
Total	14	14

This assessment area gained two moderate-income tracts and one upper-income tract and gained one upper-income tract. During this review period 100.0% of middle-income census tracts were designated as distressed due to poverty and/or unemployment.

As of June 30, 2018, CTB ranked second out of seven institutions with 19.2% of the deposit market share. BB&T ranked first with 42.5% and First Community Bank ranked third with 15.5% of the deposit market share. Deposits in this assessment area accounted for 4.4% of CTB’s total deposits, which ranks as the smallest percentage of deposits within CTB’s CRA footprint.

From January 1, 2015 through December 31, 2017 CTB originated 174 HMDA-reportable loans and 43 CRA-reportable loans, which represents 3.4% and 2.5% of the total loans originated during the evaluation period. These are the smallest HMDA and CRA markets for loans originated during the evaluation period.

In 2017, CTB ranked third among 66 HMDA reporters in the assessment area. The top two HMDA lenders in the assessment area were First Community Bank and BB&T. CTB ranked ninth of 48 CRA reporters in the assessment area in 2017. The top five CRA lenders in the assessment area were American Express, Lake Forest Bank and Trust Company, National Association, First Community Bank, BB&T, and Synchrony Bank. These lenders tend to be issuers of credit cards, and their CRA loans primarily consist of commercial credit card accounts.

A community contact interview was conducted to provide additional information regarding the assessment area. The contact, representing an economic development organization, stated a

catalyst for economic sustainability has been the development of LUMP (Land Use Master Plan) to create uses for land post mining. Partnerships with coal companies help to maximize job creation and increase the revenue base by recruiting new businesses, expanding existing businesses, and planning infrastructure to coincide with the economic development opportunities in the community. The workforce has always relied on mining as area’s primary employer; therefore, no other types of job training or certifications have typically been pursued. While some mining skills are transferable, most are not. So, individuals who want to stay in the area have to re-train or take lesser paying jobs. Population in the county has declined in the last five to eight years, particularly among the younger demographic. A push for more technical training skills is being promoted to the younger workforce in hopes of sparking entrepreneurship in other decent paying trades like electrical and welding. From a housing perspective, senior citizens are staying in their homes longer and typically passing them down to family members, who may not want the home. As a result, the property is often abandoned, and the county is left with a multitude of vacant properties. The contact stated there is a need for financial education in order to encourage individuals to become financially responsible and independent and entrepreneurial training. The contact indicated small community banks are somewhat engaged in small business outreach. While this organization attempts to connect potential entrepreneurs to other agencies that provide assistance to start-up businesses, the contact believes there needs to be shift in mindset among individuals who were used to working for large mining companies with steady pay.

Population Characteristics

According to 2015 census data, the population in the assessment area was 51,861, of which 16.2% live in moderate-income tracts. In addition 78.6% of the population was 18 years of age or older, the legal age to enter into a contract. The population age 65 and over was 15.1% in Mingo County and 18.6% in Nicholas County compared to 17.3% in West Virginia. The larger senior population particularly in Nicholas County means this assessment area probably has a smaller working- and consumer-age population and reduced economic activity. As indicated in the table below, the area’s population equally resides in Mingo and Nicholas counties. The table also shows the area’s estimated population change from 2010 to 2018.

County	Population Change				
	2010 Population	2015 Population	Percent Change 2010-2015	2018 Population	Percent Change 2015-2018
Mingo	26,839	25,278	-5.8%	23,785	-5.9%
Nicholas	26,233	25,510	-2.8%	24,842	-2.6%
West Virginia	1,852,994	1,839,767	-0.7%	1,805,832	-1.8%

*Source:
U.S. Census Bureau- American Fact Finder - April 1, 2010 to July 1, 2017 and July 1, 2017 - July 1, 2018*

During this time period, the overall the population decreased by nearly 2.0%. A community contact mentioned the declines in population primarily due to the loss of jobs in the coal industry over the past six years.

Summersville is the most populous city in Nicholas County with 3,433 residents, and its population decreased 4.1% between 2010 and 2017. Williamson is the most populous city in Mingo County

with 2,944 residents, and its population decreased by 8.4% between 2010 and 2017.³⁰

Income Characteristics

The 2015 median family income (\$42,782) in the assessment area was less than West Virginia median family income (\$48,896). As shown below, the assessment area median family income increased in 2017 and 2018, respectively.

**Borrower Income Levels
West Virginia State Non-Metro**

HUD Estimated Median Family Income		Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2017	\$49,300	0	-	\$24,649	\$24,650	-	\$39,439	\$39,440	-	\$59,159	\$59,160	-	& above
2018	\$52,200	0	-	\$26,099	\$26,100	-	\$41,759	\$41,760	-	\$62,639	\$62,640	-	& above

The Appalachian region covers all of West Virginia, and Mingo and Nicholas counties had poverty rates ranging from 29.0% to 18.5% in 2015 through 2017. In addition Mingo and Nicholas counties had poverty rates greater than 20.0%, and poverty rates greater than the state average during this time. Area poverty rates shown below illustrate a concerning trend of poverty and economic stagnations among rural residents in Appalachian West Virginia.

Poverty Rates

County	2015	2016	Percentage Point Change 2015-2016	2017	Percentage Point Change 2016-2017
Mingo	29.0%	28.2%	-0.8	31.0%	2.8
Nicholas	18.5%	21.4%	2.9	20.1%	-1.3
West Virginia	18.0%	17.9%	-0.1	18.5%	0.6
U.S.	14.7%	14.0%	-0.7	13.4%	-0.6

Source: U.S. Census Bureau

According to 2015 census data, 22.2% of the 21,631 households in this assessment area are below the poverty level, 2.9% are receiving public assistance, and 25.9% have rent costs greater than 30.0% of their monthly income.

Housing Characteristics

According to the 2015 census data, there are 25,678 housing units and 15,148 families in the assessment area. From an income perspective, 17.5% of the housing units and 16.6% of families are in the assessment area's moderate-income tracts. In addition, 67.4% of the housing units in moderate-income tracts are owner-occupied, 15.6% are rental, and 17.0% are vacant. Therefore, based on the limited number of moderate-income tracts, families and housing units and the high

³⁰ City Data: <https://datausa.io/profile/geo/summersville-wv/> and <https://datausa.io/profile/geo/summersville-wv/>

percentage of rental/vacant units, there appears to be limited credit-related opportunities for CTB to make home purchase loans and provide various aspects of affordable housing in these tracts.

The 2015 census data shows the median age of housing stock was 40 years old, and 16.4% of assessment area’s 25,678 housing units are at least 65 years old (built before 1950). This indicates there are limited opportunities to make home improvement loans. The median housing value in the assessment area was \$77,343 with an affordability ratio of 47.0. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. As indicated in the table below, median housing values increased between 2010 and 2015 with the greatest increase in value occurring in Mingo County. However, during this same time period housing became less affordable across the assessment area most likely because median family income did not keep pace with home price growth. In addition, median gross rents increased across the assessment area, particularly in Mingo County. The table below presents housing characteristics from the census data between 2010 and 2015 in the assessment area and West Virginia.

County	Housing Costs Change						Percent Change	
	Median Housing Value		Percent Change	2010 Affordability Ratio	2015 Affordability Ratio	Median Gross Rent		
	2010	2015				2010		2015
Mingo	63,900	73,200	14.6%	51.5	45.4	429	584	36.1%
Nicholas	73,400	83,100	13.2%	52.4	47.1	472	548	16.1%
West Virginia	94,500	103,800	9.8%	40.6	40.2	549	643	17.1%

Source: U.S. Census Bureau

According to 2015 census data, 15.9% of renters in the assessment area have rent costs more than \$700 a month and nearly 25.9% of units for rent (1,258) have renters who are considered to be cost burdened or have rent costs greater than 30.0% of their monthly income. Increasing rental costs may make it more difficult for potential first-time homebuyers to save enough to make a sufficient down payment in the rising interest rate environment.

Labor, Employment, and Economic Characteristics

According to ARC,³¹ the Appalachian region covers all of West Virginia. Mingo County’s economic status was considered to be distressed and Campbell County’s was considered to be at-risk as of fiscal year 2017.

According to Dun & Bradstreet, the majority of businesses (85.7%) in the assessment area have revenue under \$1 million. There are approximately 12,314 paid employees in this assessment area who are working in either the private sector or government according to WorkForce West Virginia.³² By percentage of employees, the largest job category in the assessment area is local government, followed by trade/transportation/utilities, natural resources and mining, leisure/hospitality, and professional/business sector.

³¹ Appalachian Regional Commission (ARC) – County Economic Status, FY 2017: https://www.arc.gov/reports/region_report.asp?FIPS=21999&REPORT_ID=62

³² WorkForce West Virginia: http://lmi.workforcewv.org/Employment_N_Wages/EnW.html

The table below illustrates the average unemployment rates related to this assessment area.

Unemployment Rates
Assessment Area: Nonmetropolitan West Virginia

Area	Years - Annualized	
	2017	2018
Mingo County	8.6	7.6
Nicholas County	7.1	6.4
West Virginia	5.2	5.3
National	4.4	3.9

Not Seasonally Adjusted

Data extracted on October 3, 2019

While unemployment rates across the assessment area declined between 2017 and 2018, assessment area unemployment rates were consistently higher than the unemployment rates for West Virginia and the nation. Mingo County had the highest unemployment rate, and the unemployment rate in West Virginia increased slightly between 2017 and 2018.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
NONMETROPOLITAN WEST VIRGINIA**

Lending Test

CTB’s performance relative to the investment test in the assessment area is rated “Low Satisfactory.”

CTB’s performance under the lending test in this assessment area is adequate. CTB’s lending activity demonstrates an adequate responsiveness to the credit needs of the community. CTB makes few, if any community development loans. CTB has an excellent distribution among borrowers of different income levels, and a good geographic distribution of loans with a limited level of lending gaps. CTB exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals.

Borrower distribution received greater weight than geographic distribution based on the percentage of families by family income compared to the percentage of low- and moderate-income geographies in this assessment area. To conduct a meaningful analysis, home purchase, refinance, and home improvement loans were combined and are referred to as HMDA loans throughout the analysis. CRA-reportable small business loans were not considered. Details of CTB’s HMDA and information regarding peer lending is in Appendices D, E and F.

Lending Activity

Lending levels reflect a good responsiveness to the credit needs in the assessment area. The percentage of CTB’s lending in Nonmetropolitan West Virginia is 3.1%, while the percentage of

total deposits is greater at 4.4%. CTB originated 174 HMDA loans and 43 CRA loans and had a limited level of lending gaps in this assessment area during the evaluation period.

Distribution by Borrower Income

CTB's overall distribution among borrowers of different income levels is excellent.

CTB made 52 HMDA loans totaling \$2.4 million in 2017. CTB made three (5.8%) HMDA loans totaling \$11,000 (0.5%) to low-income borrowers, which was substantially below the percentage of families at 24.1%. The percentage of loans by volume was slightly below the 2017 aggregate at 6.2% and substantially below by dollar amount at 2.9%. Given the limited loan volume and CTB's performance compared to aggregate of all lenders by volume, the borrower distribution of HMDA loans to low-income borrowers is adequate.

CTB made nine (17.3%) HMDA loans totaling \$409,000 (17.0%) to moderate-income borrowers, which exceeded the percentage of families at 16.7%. The percentage of loans by volume was slightly below the 2017 aggregate of all lenders at 17.6% and substantially exceeded the aggregate by dollar amount at 11.0%. Given the limited loan volume and CTB's strong performance compared to proxy and aggregate of all lenders, the borrower distribution of HMDA loans to moderate-income borrowers is excellent.

CTB made 18 HMDA loans totaling \$646,000 to middle-income borrowers. This represents 34.6% of HMDA loans by volume and 26.8% by dollar amount, compared to the percentage of families at 19.9%. The 2017 aggregate of all lenders made 26.9% by volume and 22.1% by dollar amount to middle-income borrowers.

CTB made 22 HMDA loans totaling \$1.3 million to upper-income borrowers. This represents 42.3% of HMDA loans by volume and 55.7% by dollar amount, compared to the percentage of families at 39.3%. The 2017 aggregate of all lenders made 41.0% by volume and 52.8% by dollar amount to upper-income borrowers.

CTB made 53 HMDA loans totaling \$2.8 million in 2016. CTB made six (11.3%) HMDA loans totaling \$69,000 (2.5%) to low-income borrowers, which was well below the percentage of families at 22.7%. The percentage of loans by volume substantially exceeded the 2016 aggregate at 6.6% and was slightly below the aggregate by dollar amount at 3.3%. Given the limited loan volume and CTB's strong performance compared to the aggregate of all lenders by volume, the borrower distribution of HMDA loans to low-income borrowers is excellent. The opportunity to lend to low-income borrowers was likely impacted by the high poverty level and unemployment rate. CTB was able to lend to these borrowers even with these constraints.

CTB made 13 (24.5%) HMDA loans totaling \$226,000 (8.1%) to moderate-income borrowers, which substantially exceeded the percentage of families at 16.7% by volume but was well below by dollar amount. The percentage of loans by volume exceeded the 2016 aggregate of all lenders at 20.7% and was below by dollar amount at 11.9%. Given CTB's strong performance compared to proxy and aggregate of all lenders by volume, the borrower distribution of HMDA loans to moderate-income borrowers is excellent.

CTB made 11 HMDA loans to middle-income borrowers totaling \$111,000. This represents 20.8% of HMDA loans by volume and 4.0% by dollar amount, compared to the percentage of families at 22.2%. The 2016 aggregate of all lenders made 23.9% by volume and 19.9% by dollar amount to middle-income borrowers.

CTB made 23 (43.4%) HMDA loans totaling \$2.4 million (85.5%) to upper-income borrowers, compared to the percentage of families at 39.6%. The 2016 aggregate of all lenders made 39.4% by volume and 50.8% by dollar amount to upper-income borrowers.

CTB made 69 HMDA loans totaling \$3.2 million in 2015. CTB made three (4.3%) HMDA loans totaling \$276,000 (8.6%) to borrowers with unknown-income designations compared to the aggregate of all lenders that made 10.9% by volume and 15.3% by dollar amount.

In 2015 CTB made seven (10.1%) HMDA loans totaling \$257,000 (8.0%) to low-income borrowers, which was well below the percentage of families at 22.7%. The percentage of loans by volume and dollar amount substantially exceeded the 2015 aggregate of all lenders at 6.9% and 3.3%, respectively. Given the limited loan volume and CTB's strong performance compared to aggregate of all lenders, the borrower distribution of HMDA loans to low-income borrowers is excellent. The opportunity to lend to low-income borrowers was likely impacted by the high poverty level and unemployment rate. CTB was able to lend to these borrowers even with these constraints.

CTB made 13 (18.8%) HMDA loans totaling \$372,000 (11.6%) to moderate-income borrowers, which exceeded the percentage of families at 16.7% by volume and was below by dollar amount. The percentage of loans by volume and dollar amount exceeded the 2015 aggregate of all lenders at 16.9% and 10.3%, respectively. Given CTB's strong performance compared to proxy and aggregate of all lenders, the borrower distribution of HMDA loans to moderate-income borrowers is excellent.

CTB made 15 HMDA loans to middle-income borrowers totaling \$654,000. This represents 21.7% of HMDA loans by volume and 20.4% by dollar amount, compared to the percentage of families at 21.1%. The 2015 aggregate of all lenders made 22.0% by volume and 17.2% by dollar amount to middle-income borrowers.

CTB made 31 HMDA loans totaling \$1.6 million to upper-income borrowers. This represents 44.9% of HMDA loans by volume and 1.4% by dollar amount, compared to the percentage of families at 39.6%. The 2015 aggregate of all lenders made 43.3% by volume and 53.8% by dollar volume to upper-income borrowers.

The volume of lending to moderate-income borrowers consistently exceeded the proxy and aggregate. While the percentage of lending to low-income borrowers was below the proxy, CTB generally exceeded the aggregate of all lenders' performance. CTB was able to make loans in an area with challenging economic conditions, including high poverty and unemployment; therefore, borrower distribution of HMDA lending is excellent.

Geographic Distribution of Loans

CTB's overall distribution of lending among geographies is good primarily due to the limited level of gaps in lending. The following gaps in lending were noted in the assessment area.

Tract Income Level	Percentage of Lending Penetration		
	2015	2016	2017
Moderate	0.0%	0.0%	100.0%
Middle	84.6%	100.0%	100.0%
Upper	N/A	N/A	100.0%
Total	78.6%	92.9%	100.0%

Overall, lending gaps are limited. CTB was able to penetrate a majority of its census tracts in this assessment area during the evaluation period. While CTB did not make loans in the only moderate-income tract in 2015 and 2016, CTB was able to make one or more loans in all three moderate-income tracts in 2017. Also, CTB made one or more loans in all middle-income geographies in 2016 and 2017, which is noteworthy since these tracts are all designated as distressed.

CTB made 52 HMDA loans totaling \$2.4 million in 2017. CTB made four (7.7%) HMDA loans in moderate-income tracts totaling \$84,000 (3.5%), which was well below the percentage of owner-occupied units in these tracts at 18.1%. The percentage of loans by volume exceeded the 2017 aggregate of all lenders at 7.4% and was below by dollar amount at 5.5%. Given CTB's performance compared to the aggregate of all lenders volume, the geographic distribution of HMDA loans in moderate-income tracts is good.

CTB made 45 HMDA loans totaling \$2.3 million in middle-income tracts. This is 86.5% of HMDA loans by volume and 95.3% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 69.4%. The 2017 aggregate of all lenders made 73.6% by volume and 69.1% by dollar amount in middle-income tracts.

CTB made three HMDA loans totaling \$29,000 in upper-income tracts. This is 5.8% of HMDA loans by volume and 1.2% by dollar amount, compared to the percentage of owner-occupied units in these tracts at 12.5%. The 2017 aggregate of all lenders made 18.8% by volume and 25.2% by dollar amount in upper-income tracts.

CTB made 53 HMDA loans totaling \$2.8 million in 2016. CTB made no HMDA loans in the moderate-income tract compared to the percentage of owner-occupied units in these tracts at 3.2% and the 2016 aggregate of all lenders that made loans at 1.0% by volume and 0.6% by dollar amount. Given that CTB made no HMDA loans compared to the proxy and aggregate of all lenders, the geographic distribution of HMDA loans in moderate-income tracts is poor.

CTB made 53 HMDA loans totaling \$2.8 million in middle-income tracts. This represents 100.0% of HMDA loans originated in 2016 by volume and dollar amount. The percentage of owner-occupied units in these tracts is 96.8%. The 2016 aggregate of all lenders made 99.0% by volume and 99.4% by dollar amount in middle-income tracts.

CTB made 69 HMDA loans totaling \$3.2 million in 2015. CTB made no HMDA loans in the moderate-income tract compared to the percentage of owner-occupied units in these tracts at 3.2% and the 2015 aggregate of all lenders that made loans at 2.7% by volume and 1.6% by dollar amount. Given CTB made no HMDA loans compared to the proxy and aggregate of all lenders, the geographic distribution of HMDA loans in moderate-income tracts is poor.

CTB made 69 HMDA loans totaling \$3.2 million in middle-income tracts. This represents 100.0% of HMDA loans originated in 2015 by volume and dollar amount. The percentage of owner-occupied units in these tracts is 96.8%. The 2015 aggregate of all lenders made 95.6% by volume and 95.9% by dollar amount in middle-income tracts.

CTB made no HMDA loans in the moderate-income tract in 2015 and 2016, while the number of housing units is limited, there some opportunity to make loans in that tract. CTB's HMDA lending performance was slightly below the percentage of owner-occupied units and exceeded aggregate of all lenders; therefore, geographic distribution of HMDA lending is adequate.

Community Development Loans

CTB originated no community development loans during the evaluation period compared to having 4.4% of total deposits and 3.1% of total loans in this assessment area. While CTB ranked second out of seven institutions with 19.2% of the deposit market share, West Virginia is not a major market for CTB. Therefore, CTB makes few, if any community development loans in this assessment area.

Flexible Lending Practices

CTB originated three SBA 7(a) loans totaling \$597,800. These loans provide funds to start-ups and existing small businesses with access to capital with more flexible repayment terms than conventional commercial financing for multiple purposes. CTB also originated seven SBA 7(a) loans totaling \$5.9 million that benefited small businesses in counties within West Virginia, but outside CTB's delineated assessment area.

CTB makes limited use of flexible lending practices in serving the credit needs of the Nonmetropolitan West Virginia assessment area. These programs are designed to improve affordable housing for low- and moderate-income individuals and provide small businesses with access to capital to help existing companies retain and expand their businesses or attract new small businesses to the area. Further, a community contact noted the need to provide assistance to small businesses (i.e., startup businesses). Therefore, the impact of this loan program to small businesses enhanced CTB's overall lending test performance.

Investment Test

CTB's performance relative to the investment test in the assessment area is rated "High Satisfactory."

Consideration was given to a qualified community development investment totaling \$1.7 million that supports affordable housing initiatives across West Virginia with a purpose, mandate, or function that includes serving the geographies or individuals located within CTB's assessment areas. This statewide investment represents 3.9% of total qualified investments by dollar amount and was part of the CRA Qualified Investment Fund. The fund invested in a bond series issued by the West Virginia Housing Development Fund to finance single-family mortgage loans to low- and moderate-income individuals. According to demographic data, housing became less affordable across the assessment area, median family income did not keep pace with home price growth, and median gross rents increased; therefore, qualified investments exhibit a good responsiveness to credit and community development needs across the assessment area.

Since CTB was considered responsive to the credit and community development needs; investments that do not support organizations or activities with a purpose, mandate, or function of serving CTB's geographies or individuals located within West Virginia were considered to positively impact state performance. Consideration was given to a qualified community development investment which was part of the CRA Qualified Investment Fund. This investment totaling \$514,689 supported the purchase of five single-family homes for a low- or moderate-income individuals.

CTB made ten donations totaling \$5,675 in this assessment area representing 0.4% of total dollar volume of donations. This ranks as CTB's fourth highest percentage of donations made during the evaluation period. These donations supported seven non-profit organizations that provide a multitude of services to low- and moderate-income individuals and families.

Lastly, consideration was given to a donation totaling \$2,500 to the American Red Cross to provide aide to displaced flood victims in West Virginia, which was designated as a major disaster area by the federal government in 2016 in the aftermath of torrential rainfall and widespread and destructive flash floods throughout the state.

Overall, CTB made 4.0% of its total qualified community development investments and donations in this assessment area, which is comparable to the percentage of total deposits at 4.4% and greater than total loans at 3.1% and branch offices at 2.5%. Therefore, CTB made a relatively high level of qualified community development investments in Nonmetropolitan West Virginia assessment area, particularly those not routinely provided by private investors, occasionally in a leadership position.

Service Test

CTB's performance relative to the services test in the assessment area is rated "Low Satisfactory." Retail services are reasonably accessible and CTB provides a limited level of community development services.

Retail Services

CTB has not opened or closed any offices since the previous evaluation; therefore, CTB's record of opening and closing offices has not adversely affected the accessibility of its delivery systems, in moderate-income geographies and to low- and moderate-income households. CTB's delivery

services are reasonably accessible to portions of CTB's geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including moderate-income geographies or to low- and moderate-income households, and are consistent with the services and hours discussed in the "Institution" assessment.

CTB has a branch office with a cash-only ATM in a middle-income census tract and in an upper-income census tract. Both branches provide drive-through services and either extended or weekend hours of service. CTB also has a stand-alone cash-only ATM outside its delineated assessment area located at Appalachian Regional Healthcare (ARH) in Beckley. CTB's branch offices in this assessment area represent 2.5% of its branch offices.

The following table illustrates the percentage of branch offices in moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts in 2017 based on 2015 census data. Both branch offices were located in middle-income census tracts in 2015/2016 based on 2010 census data.

Geographic Distribution of Branches

Analysis Year: 2017

Exam: Community Trust Bank 2019

Non Metropolitan West Virginia 2017

Tract Income Levels	BRANCHES							DEMOGRAPHICS				
	Total Branches		Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses	
	#	%	#	#	#	#	#	#	%	%	%	
Low	Total	0	0.0%	0	0	0	0	0	0	0.0%	0.0%	0.0%
	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
Moderate	Total	0	0.0%	0	0	0	0	0	3	21.4%	17.2%	12.3%
	DTO	0		0	0	0						
	LS	0		0	0							
Middle	Total	1	50.0%	0	0	1	1	0	10	71.4%	69.4%	55.5%
	DTO	0		0	0	0						
	LS	0		0	0							
Upper	Total	1	50.0%	0	0	1	0	1	1	7.1%	13.4%	32.1%
	DTO	0		0	0	0						
	LS	0		0	0							
Unknown	Total	0	0.0%	0	0	0	0	0	0	0.0%	0.0%	0.0%
	DTO	0		0	0	0						
	LS	0		0	0							
<i>Totals</i>	Total	2	100.0%	0	0	2	1	1	14	100.0%	100.0%	100.0%
	DTO	0		0	0	0						
	LS	0		0	0							

DTO - Drive Thru Only

LS - Limited Service

Shaded rows indicate totals; unshaded rows are a subset of shaded rows

*Closed branches are only included in the "Closed" columns and are not included in any other totals

LPOs not included in totals.

While CTB has no branch offices in the assessment area’s moderate-income tracts, CTB was able to deliver retail banking services (e.g., residential mortgage loans) to low- and moderate-income borrowers and in moderate-income geographies from its two branches located in middle- and upper-income tracts. These branches are accessible to moderate-income tracts through U.S. and state highways.

Community Development Services

CTB provides a limited level of community development services in this assessment area. During the evaluation period, one employee gave 80 hours serving as a board member for two organizations that support regional and local area economic development initiatives. This represents 1.0% of all community development service hours, which is less than the percentage of total deposits at 4.4% and the percentage of branch offices at 2.5%.

APPENDIX A

SCOPE OF EVALUATION

TIME PERIOD REVIEWED	HMDA Loans: January 1, 2015 – December 31, 2017 Small Business (CRA) Loans: January 1, 2015 – December 31, 2017 Community Development Loans, Investments Services: April 1, 2015 – October 7, 2019	
FINANCIAL INSTITUTION Community Trust Bank, Inc. / Pikeville, Kentucky		PRODUCTS REVIEWED HMDA / Small Business
AFFILIATE(S) Community Trust Community Development Corporation (CDC)	AFFILIATE RELATIONSHIP Bank subsidiary	PRODUCTS REVIEWED LIHTC/NMTCs/MBS

LIST OF ASSESSMENT AREAS AND TYPE OF EVALUATION			
ASSESSMENT AREA	TYPE OF REVIEW	BRANCHES VISITED	OTHER INFORMATION
MULTISTATE Huntington-Ashland WV-KY-OH MSA	Full Scope Review	None	None
COMMONWEALTH OF KENTUCKY Lexington-Fayette MSA Nonmetropolitan Kentucky	Full-Scope Review Full-Scope Review	None None	None None

STATE OF TENNESSEE Knoxville MSA	Full-Scope Review	None	None
STATE OF WEST VIRGINIA Nonmetropolitan West Virginia	Full-Scope Review	None	None

APPENDIX B

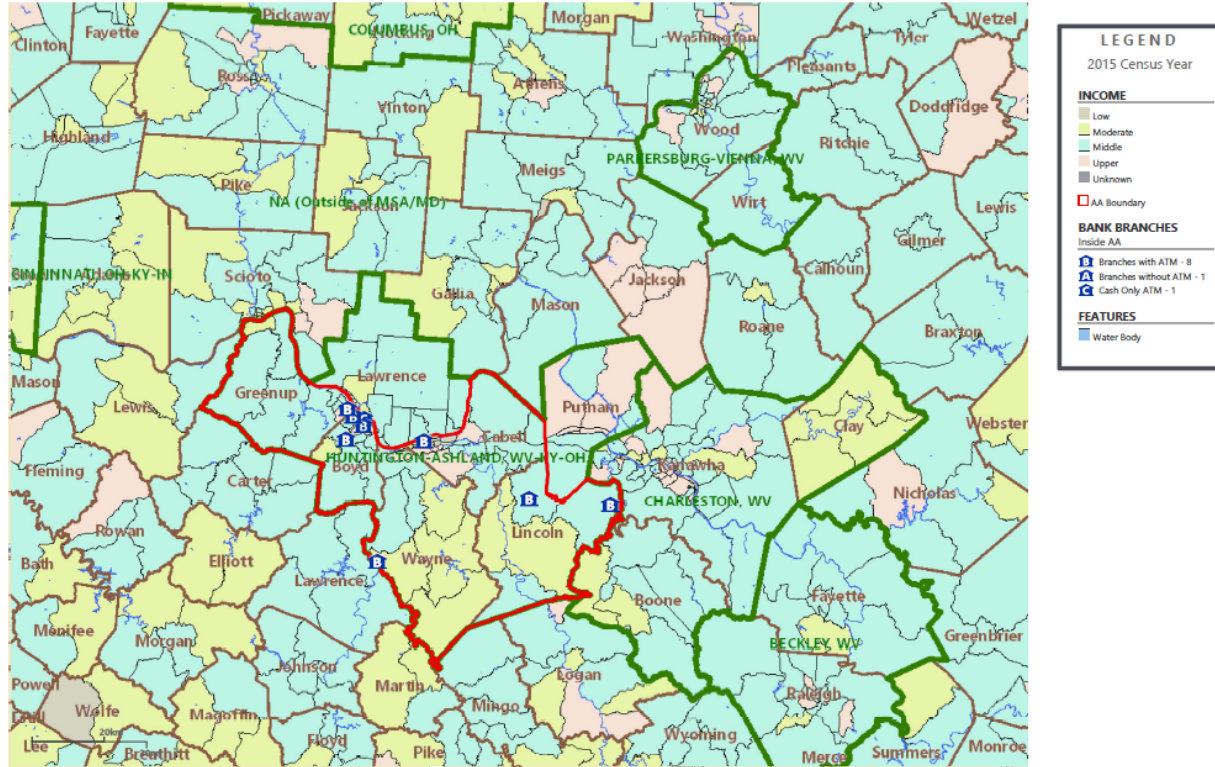
SUMMARY OF MULTI-STATE METROPOLITAN AREA and STATE RATINGS

Ratings	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Institution	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Huntington-Ashland WV-KY-OH MSA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Commonwealth of Kentucky	Outstanding	Outstanding	Outstanding	Outstanding
State of Tennessee	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of West Virginia	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

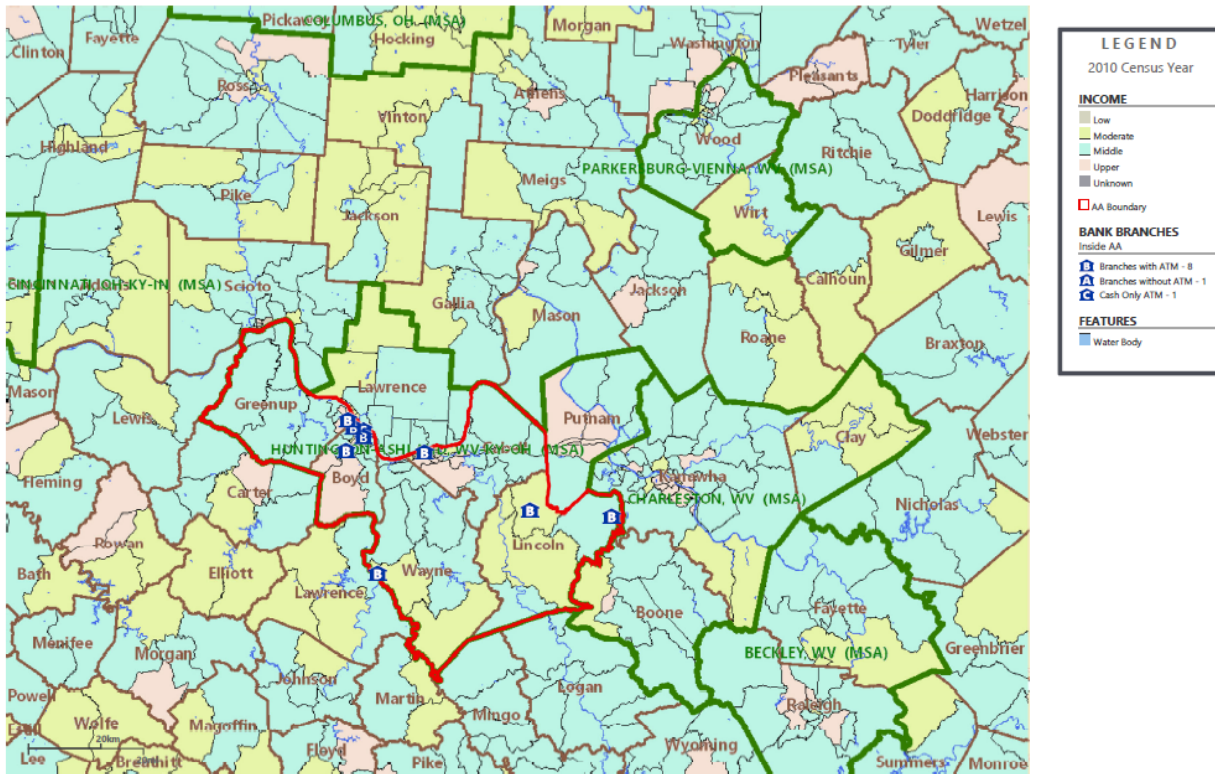
APPENDIX C

ASSESSMENT AREA MAPS

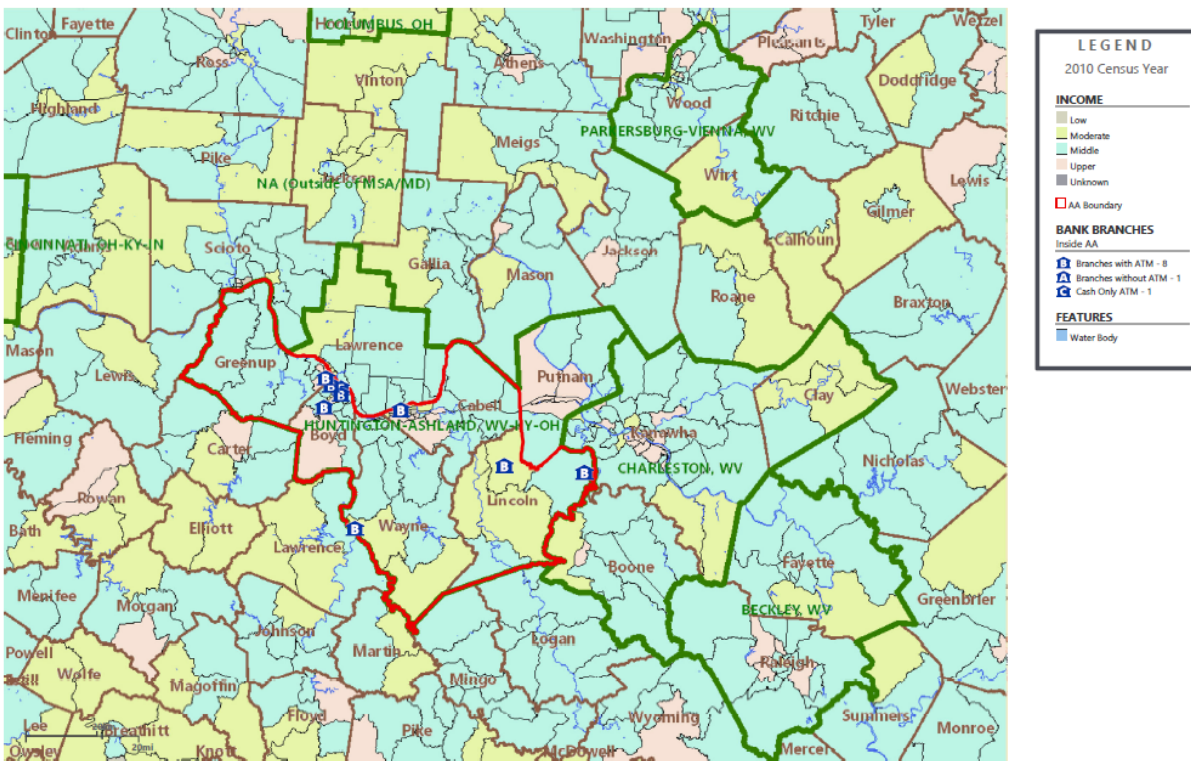
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580 2017



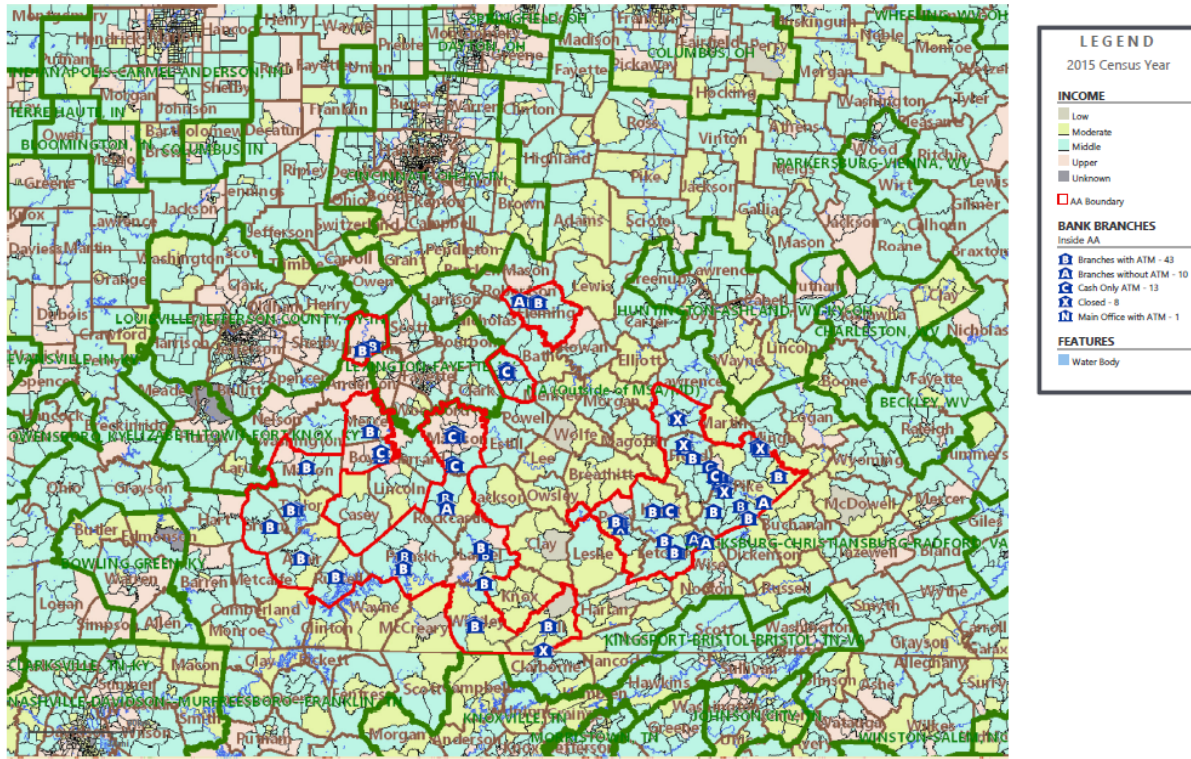
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580 2016



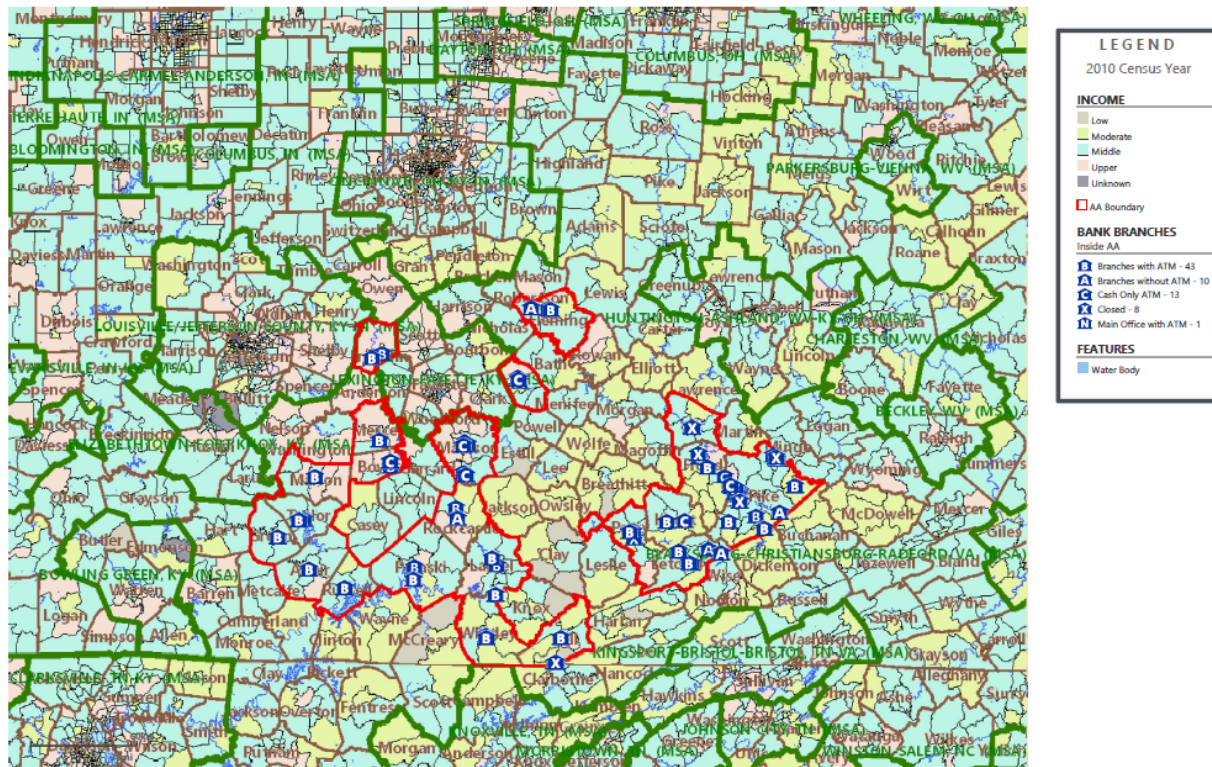
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580 2015



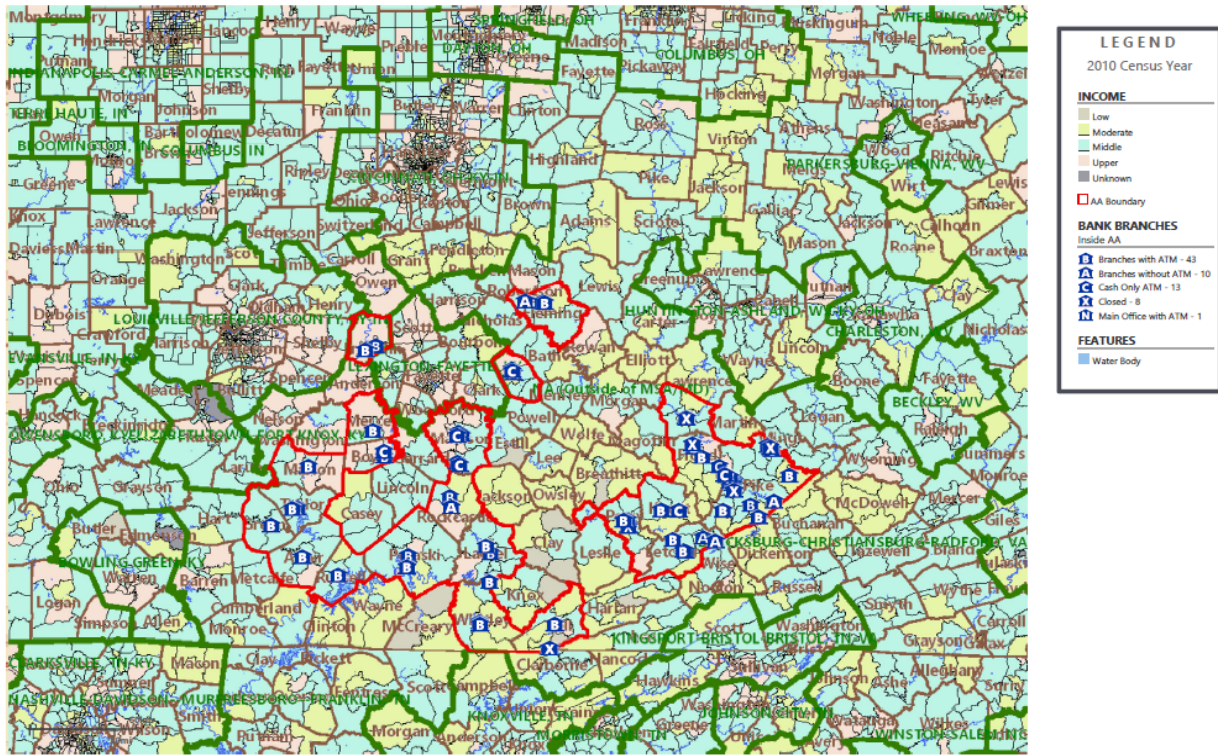
Assessment Area: Non Metropolitan Kentucky 2017



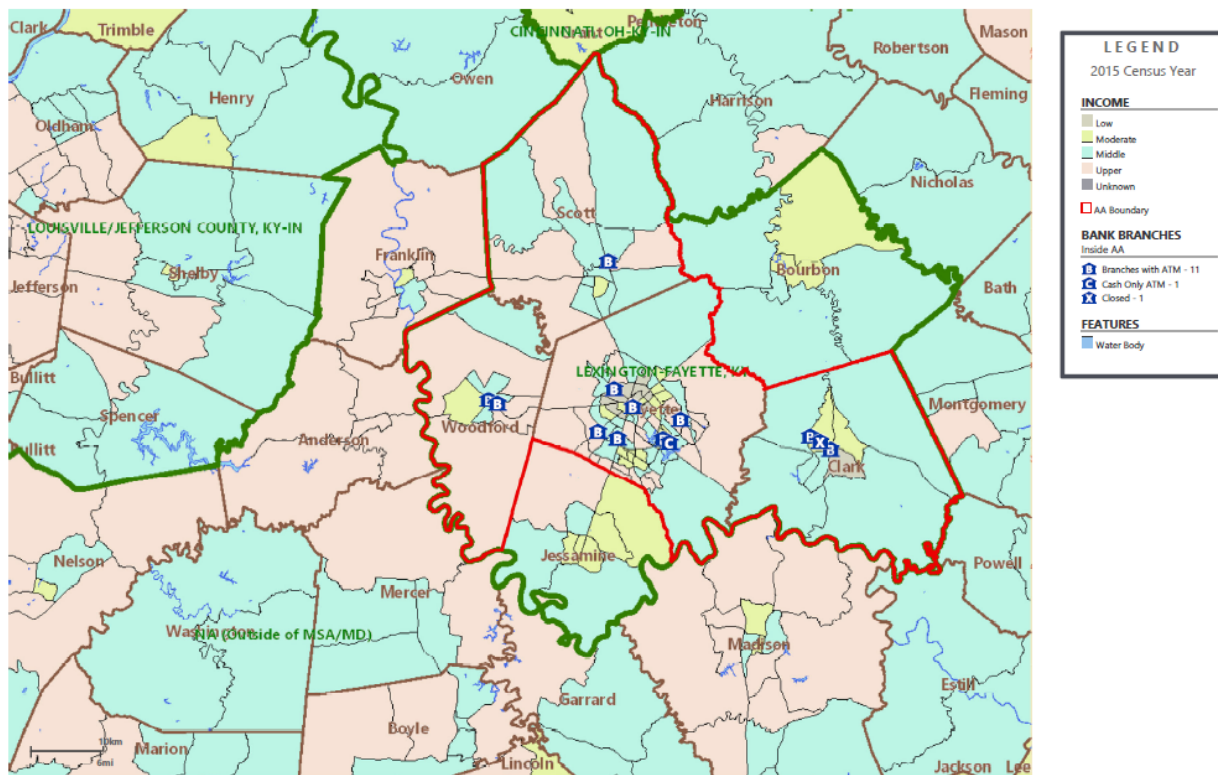
Assessment Area: Non Metropolitan Kentucky 2016



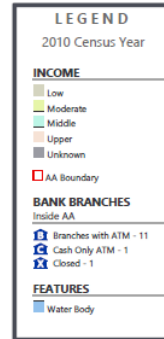
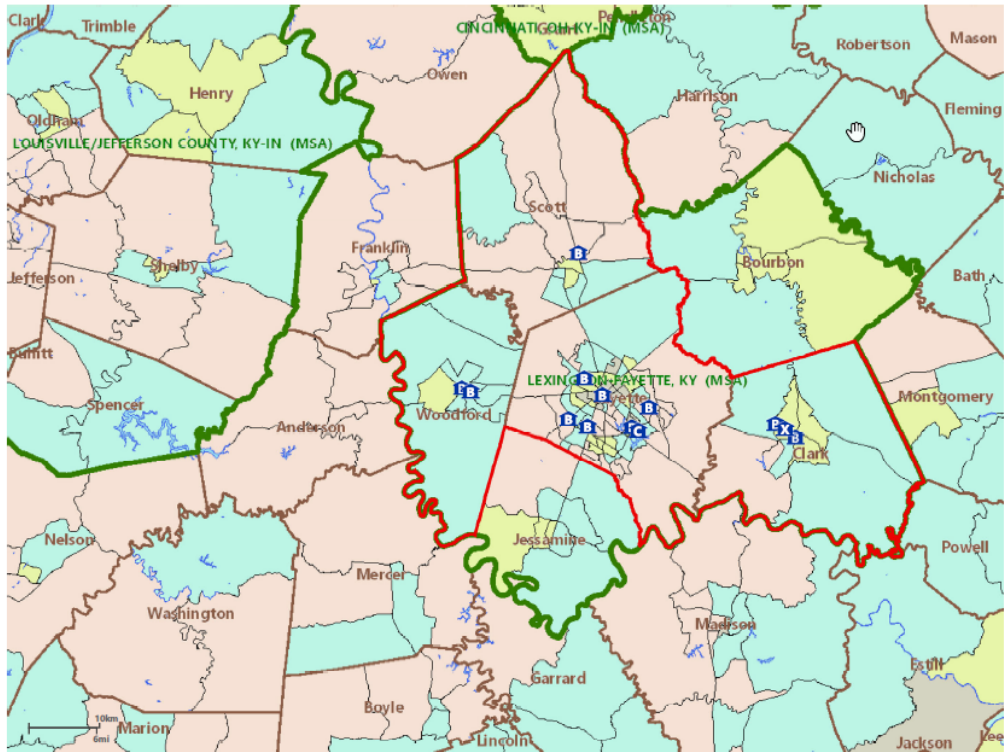
Assessment Area: Non Metropolitan Kentucky 2015



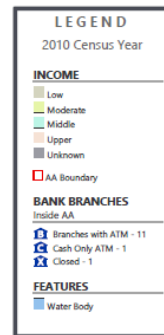
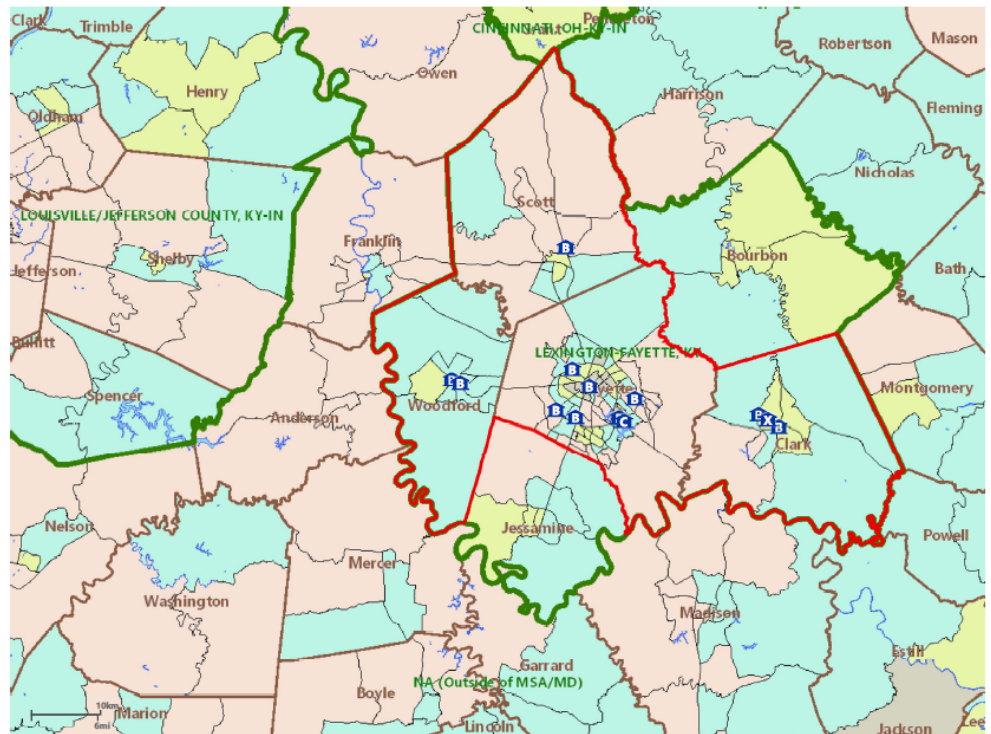
Assessment Area: Lexington-Fayette, KY MSA #30460 2017



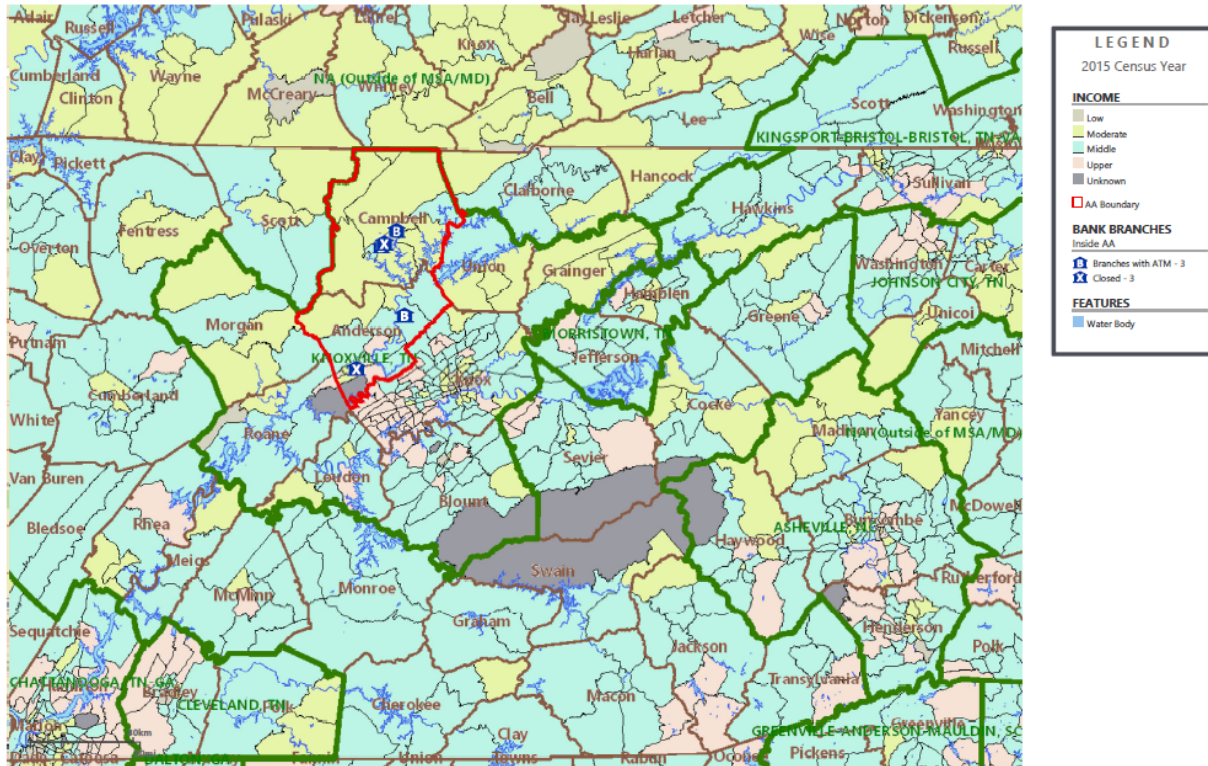
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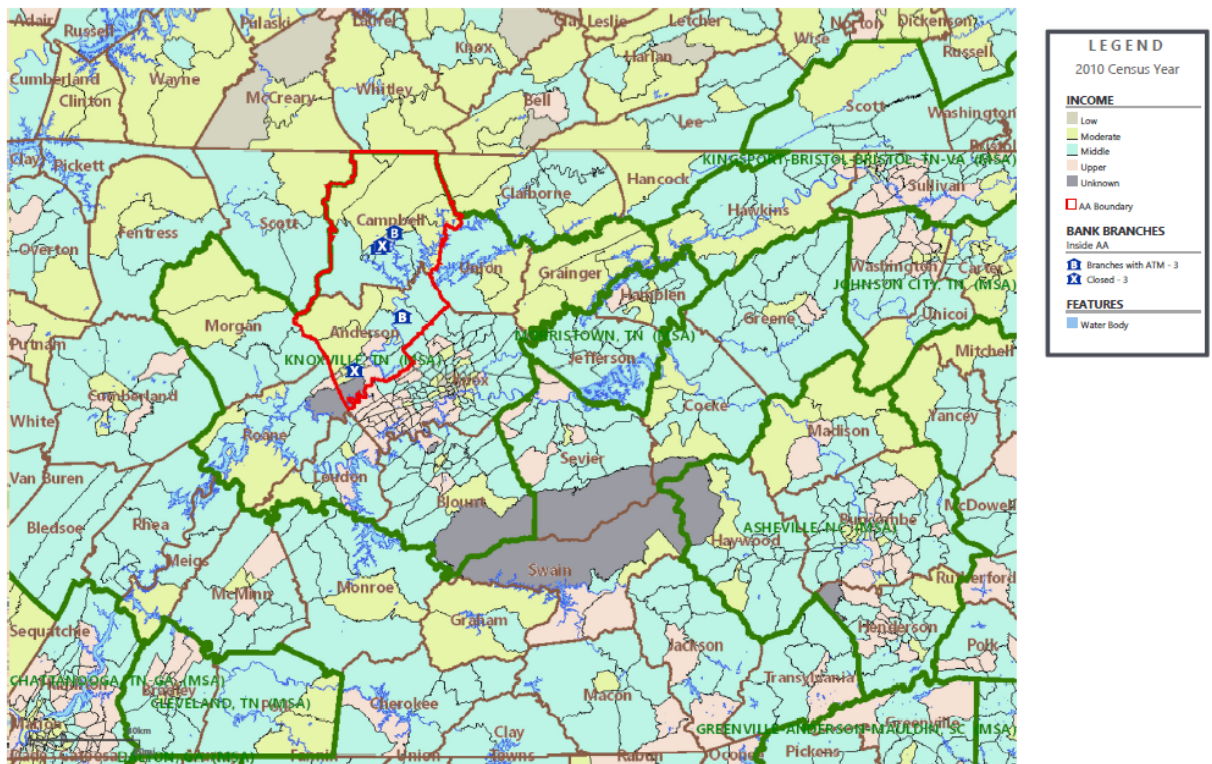
Assessment Area: Lexington-Fayette, KY MSA #30460 2015



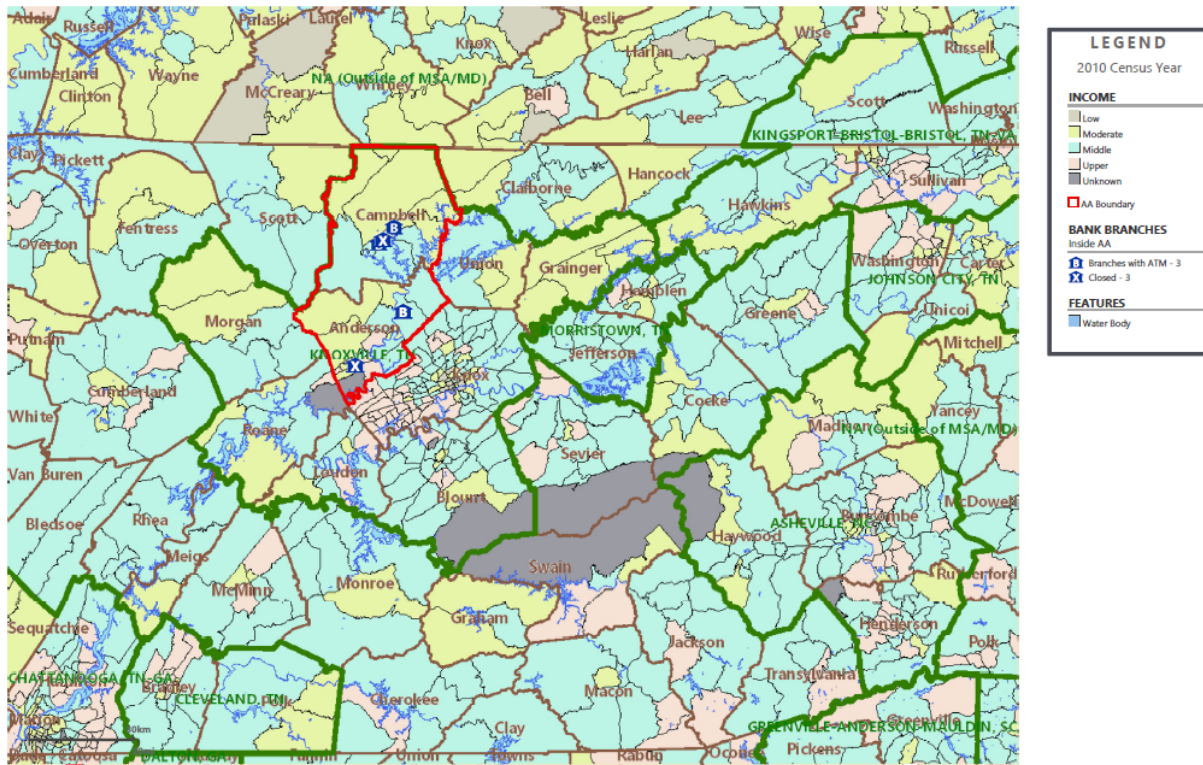
Assessment Area: Knoxville, TN MSA #28940 2017



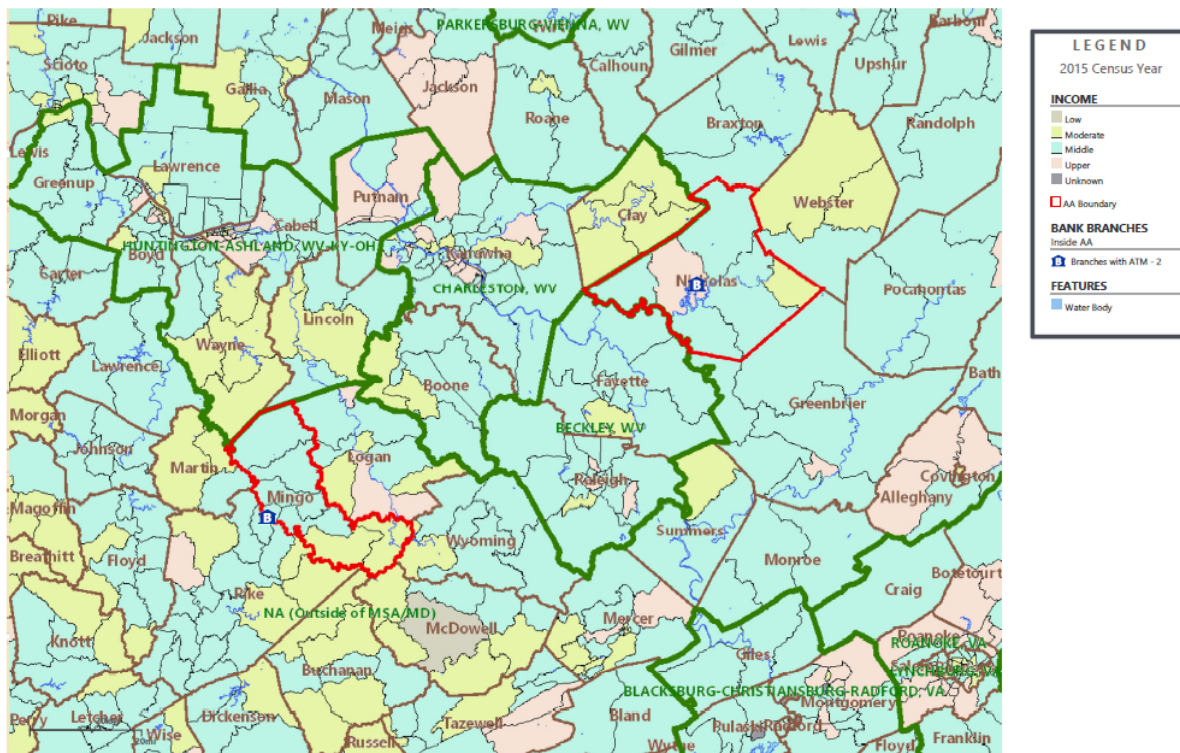
Assessment Area: Knoxville, TN MSA #28940 2016



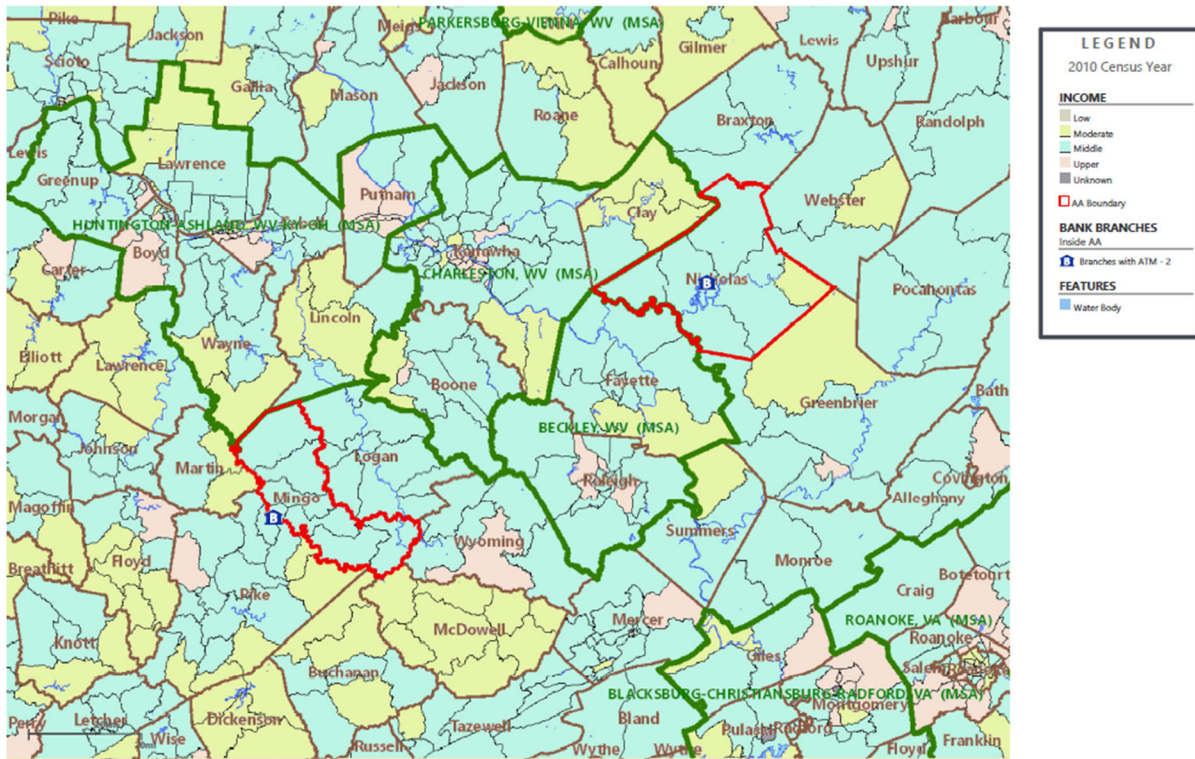
Assessment Area: Knoxville, TN MSA #28940 2015



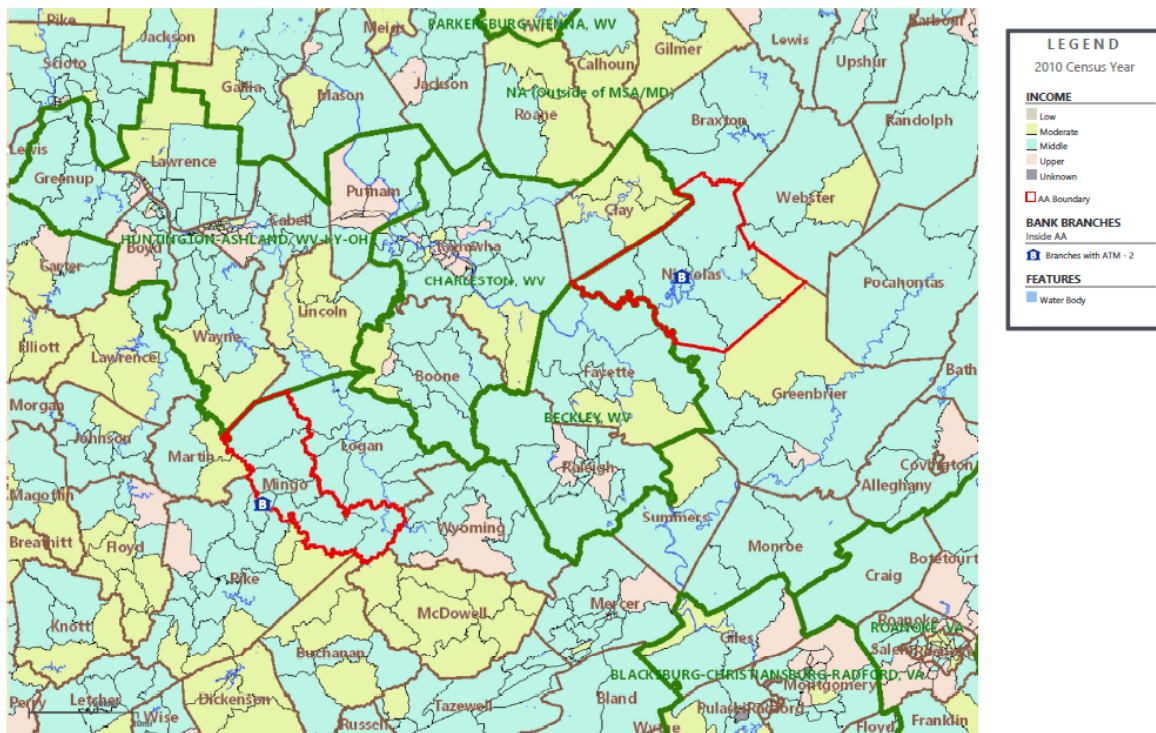
Assessment Area: Non Metropolitan West Virginia 2017



Assessment Area: Non Metropolitan West Virginia 2016



Assessment Area: Non Metropolitan West Virginia 2015



APPENDIX D

FULL SCOPE LENDING TABLES

HMDA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group :Huntington Ashland WV KY OH MSA #26580 2017

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	2	4.1%	153	2.5%	6	12.2%	402	6.6%
Moderate	6	12.2%	361	6.0%	9	18.4%	734	12.1%
Low/Moderate Total	8	16.3%	514	8.5%	15	30.6%	1,136	18.7%
Middle	27	55.1%	3,723	61.4%	8	16.3%	712	11.7%
Upper	14	28.6%	1,824	30.1%	23	46.9%	3,864	63.8%
Unknown	0	0.0%	0	0.0%	3	6.1%	349	5.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	49	100.0%	6,061	100.0%	49	100.0%	6,061	100.0%
	Refinance							
Low	2	7.4%	189	5.1%	2	7.4%	69	1.9%
Moderate	1	3.7%	43	1.2%	2	7.4%	241	6.5%
Low/Moderate Total	3	11.1%	232	6.3%	4	14.8%	310	8.4%
Middle	16	59.3%	2,530	68.6%	6	22.2%	530	14.4%
Upper	8	29.6%	927	25.1%	17	63.0%	2,849	77.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	27	100.0%	3,689	100.0%	27	100.0%	3,689	100.0%
	Home Improvement							
Low	2	6.3%	18	1.8%	4	12.5%	7	0.7%
Moderate	5	15.6%	105	10.4%	6	18.8%	38	3.8%
Low/Moderate Total	7	21.9%	123	12.2%	10	31.3%	45	4.5%
Middle	16	50.0%	590	58.4%	5	15.6%	20	2.0%
Upper	9	28.1%	297	29.4%	17	53.1%	945	93.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	32	100.0%	1,010	100.0%	32	100.0%	1,010	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	50.0%	2,121	36.1%	0	0.0%	0	0.0%
Low/Moderate Total	1	50.0%	2,121	36.1%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	50.0%	3,750	63.9%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	5,871	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	5,871	100.0%	2	100.0%	5,871	100.0%
	HMDA Totals							
Low	6	5.5%	360	2.2%	12	10.9%	478	2.9%
Moderate	13	11.8%	2,630	15.8%	17	15.5%	1,013	6.1%
Low/Moderate Total	19	17.3%	2,990	18.0%	29	26.4%	1,491	9.0%
Middle	59	53.6%	6,843	41.1%	19	17.3%	1,262	7.6%
Upper	32	29.1%	6,798	40.9%	57	51.8%	7,658	46.0%
Unknown	0	0.0%	0	0.0%	5	4.5%	6,220	37.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	110	100.0%	16,631	100.0%	110	100.0%	16,631	100.0%

*Information based on 2015 ACS data

HMDA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group Huntington Ashland WV KY OH MSA #26580 2016

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	2	4.9%	163	3.3%
Moderate	6	14.6%	621	12.7%	5	12.2%	401	8.2%
Low/Moderate Total	6	14.6%	621	12.7%	7	17.1%	564	11.5%
Middle	28	68.3%	3,474	71.0%	10	24.4%	1,067	21.8%
Upper	7	17.1%	798	16.3%	19	46.3%	2,887	59.0%
Unknown	0	0.0%	0	0.0%	5	12.2%	375	7.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	41	100.0%	4,893	100.0%	41	100.0%	4,893	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	7.1%	555	17.7%	4	14.3%	216	6.9%
Low/Moderate Total	2	7.1%	555	17.7%	4	14.3%	216	6.9%
Middle	22	78.6%	2,318	74.0%	8	28.6%	800	25.6%
Upper	4	14.3%	258	8.2%	14	50.0%	1,698	54.2%
Unknown	0	0.0%	0	0.0%	2	7.1%	417	13.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	3,131	100.0%	28	100.0%	3,131	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	2	5.1%	10	0.6%
Moderate	8	20.5%	112	6.7%	11	28.2%	185	11.0%
Low/Moderate Total	8	20.5%	112	6.7%	13	33.3%	195	11.6%
Middle	20	51.5%	856	51.0%	12	30.8%	517	30.8%
Upper	11	28.2%	709	42.3%	11	28.2%	722	43.1%
Unknown	0	0.0%	0	0.0%	3	7.7%	243	14.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	39	100.0%	1,677	100.0%	39	100.0%	1,677	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	37.5%	3,261	39.0%	0	0.0%	0	0.0%
Low/Moderate Total	3	37.5%	3,261	39.0%	0	0.0%	0	0.0%
Middle	5	62.5%	5,108	61.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	8	100.0%	8,369	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	8,369	100.0%	8	100.0%	8,369	100.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	4	3.4%	173	1.0%
Moderate	19	16.4%	4,549	25.2%	20	17.2%	802	4.4%
Low/Moderate Total	19	16.4%	4,549	25.2%	24	20.7%	975	5.4%
Middle	75	64.7%	11,756	65.1%	30	25.9%	2,384	13.2%
Upper	22	19.0%	1,765	9.8%	44	37.9%	5,307	29.4%
Unknown	0	0.0%	0	0.0%	18	15.5%	9,404	52.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	116	100.0%	18,070	100.0%	116	100.0%	18,070	100.0%

HMDA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group Huntington Ashland WV KY OH MSA #26580 2015

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	1	3.2%	220	4.2%	0	0.0%	0	0.0%
Moderate	9	29.0%	1,012	19.4%	2	6.5%	190	3.6%
Low/Moderate Total	10	32.3%	1,232	23.6%	2	6.5%	190	3.6%
Middle	12	38.7%	1,647	31.5%	10	32.3%	1,474	28.2%
Upper	9	29.0%	2,344	44.9%	15	48.4%	2,902	55.6%
Unknown	0	0.0%	0	0.0%	4	12.9%	657	12.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	31	100.0%	5,223	100.0%	31	100.0%	5,223	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	3	9.7%	244	6.5%
Moderate	2	6.5%	240	6.4%	4	12.9%	269	7.1%
Low/Moderate Total	2	6.5%	240	6.4%	7	22.6%	513	13.6%
Middle	20	64.5%	2,274	60.2%	10	32.3%	985	26.1%
Upper	9	29.0%	1,262	33.4%	13	41.9%	1,930	51.1%
Unknown	0	0.0%	0	0.0%	1	3.2%	348	9.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	31	100.0%	3,776	100.0%	31	100.0%	3,776	100.0%
	Home Improvement							
Low	1	2.6%	5	0.3%	5	12.8%	42	2.1%
Moderate	12	30.8%	426	21.7%	7	17.9%	132	6.7%
Low/Moderate Total	13	33.3%	431	22.0%	12	30.8%	174	8.9%
Middle	19	48.7%	1,295	66.0%	11	28.2%	432	22.0%
Upper	7	17.9%	236	12.0%	15	38.5%	1,253	63.9%
Unknown	0	0.0%	0	0.0%	1	2.6%	103	5.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	39	100.0%	1,962	100.0%	39	100.0%	1,962	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	33.3%	200	11.1%	0	0.0%	0	0.0%
Low/Moderate Total	1	33.3%	200	11.1%	0	0.0%	0	0.0%
Middle	2	66.7%	1,600	88.9%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	100.0%	1,800	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	1,800	100.0%	3	100.0%	1,800	100.0%
	HMDA Totals							
Low	2	1.9%	225	1.8%	8	7.7%	286	2.2%
Moderate	24	23.1%	1,878	14.7%	13	12.5%	591	4.6%
Low/Moderate Total	26	25.0%	2,103	16.5%	21	20.2%	877	6.9%
Middle	53	51.0%	6,816	53.4%	31	29.8%	2,891	22.7%
Upper	25	24.0%	3,842	30.1%	43	41.3%	6,085	47.7%
Unknown	0	0.0%	0	0.0%	9	8.7%	2,908	22.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	104	100.0%	12,761	100.0%	104	100.0%	12,761	100.0%

HMDA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group :Non Metropolitan Kentucky 2017

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	2	0.4%	78	0.1%	26	4.6%	1,331	1.6%
Moderate	73	12.9%	7,612	9.4%	65	11.4%	5,566	6.9%
Low/Moderate Total	75	13.2%	7,690	9.5%	91	16.0%	6,897	8.5%
Middle	384	67.6%	53,371	66.1%	114	20.1%	11,284	14.0%
Upper	109	19.2%	19,664	24.4%	325	57.2%	55,548	68.8%
Unknown	0	0.0%	0	0.0%	38	6.7%	6,996	8.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	568	100.0%	80,725	100.0%	568	100.0%	80,725	100.0%
	Refinance							
Low	2	0.7%	170	0.4%	11	4.0%	822	2.2%
Moderate	39	14.1%	5,055	13.3%	33	11.9%	2,433	6.4%
Low/Moderate Total	41	14.8%	5,225	13.8%	44	15.9%	3,255	8.6%
Middle	199	71.8%	26,346	69.5%	60	21.7%	6,061	16.0%
Upper	37	13.4%	6,351	16.7%	168	60.6%	26,947	71.1%
Unknown	0	0.0%	0	0.0%	5	1.8%	1,659	4.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	277	100.0%	37,922	100.0%	277	100.0%	37,922	100.0%
	Home Improvement							
Low	2	0.6%	28	0.2%	32	9.2%	463	3.3%
Moderate	64	18.4%	2,119	15.3%	71	20.4%	1,738	12.5%
Low/Moderate Total	66	19.0%	2,147	15.5%	103	29.6%	2,201	15.8%
Middle	256	73.6%	9,995	72.0%	89	25.6%	2,655	19.1%
Upper	26	7.5%	1,749	12.6%	151	43.4%	8,535	61.4%
Unknown	0	0.0%	0	0.0%	5	1.4%	500	3.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	348	100.0%	13,891	100.0%	348	100.0%	13,891	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	5	71.4%	1,850	38.9%	0	0.0%	0	0.0%
Upper	2	28.6%	2,905	61.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	7	100.0%	4,755	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	4,755	100.0%	7	100.0%	4,755	100.0%
	HMDA Totals							
Low	6	0.5%	276	0.2%	69	5.8%	2,616	1.9%
Moderate	176	14.7%	14,786	10.8%	169	14.1%	9,737	7.1%
Low/Moderate Total	182	15.2%	15,062	11.0%	238	19.8%	12,353	9.0%
Middle	844	70.3%	91,562	66.7%	263	21.9%	20,000	14.6%
Upper	174	14.5%	30,669	22.3%	644	53.7%	91,030	66.3%
Unknown	0	0.0%	0	0.0%	55	4.6%	13,910	10.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,200	100.0%	137,293	100.0%	1,200	100.0%	137,293	100.0%

*Information based on 2015 ACS data

HMDA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group :Non Metropolitan Kentucky 2016

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	23	4.6%	1,388	2.0%
Moderate	68	13.7%	8,044	11.5%	62	12.5%	4,740	6.8%
Low/Moderate Total	68	13.7%	8,044	11.5%	85	17.1%	6,128	8.8%
Middle	308	62.1%	40,568	58.1%	92	18.5%	8,673	12.4%
Upper	120	24.2%	21,237	30.4%	273	55.0%	50,349	72.1%
Unknown	0	0.0%	0	0.0%	46	9.3%	4,699	6.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	496	100.0%	69,849	100.0%	496	100.0%	69,849	100.0%
Refinance								
Low	0	0.0%	0	0.0%	17	5.0%	1,068	2.3%
Moderate	55	16.3%	6,679	14.2%	47	13.9%	3,222	6.9%
Low/Moderate Total	55	16.3%	6,679	14.2%	64	19.0%	4,290	9.1%
Middle	220	65.3%	29,576	63.1%	66	19.6%	6,826	14.6%
Upper	62	18.4%	10,632	22.7%	198	58.8%	30,627	65.3%
Unknown	0	0.0%	0	0.0%	9	2.7%	5,144	11.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	337	100.0%	46,887	100.0%	337	100.0%	46,887	100.0%
Home Improvement								
Low	1	0.3%	5	0.0%	56	14.1%	589	3.8%
Moderate	116	29.2%	4,236	27.1%	89	22.4%	1,948	12.5%
Low/Moderate Total	117	29.5%	4,241	27.2%	145	36.5%	2,537	16.3%
Middle	237	59.7%	8,216	52.6%	93	23.4%	3,260	20.9%
Upper	43	10.8%	3,151	20.2%	153	38.5%	9,407	60.3%
Unknown	0	0.0%	0	0.0%	6	1.5%	404	2.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	397	100.0%	15,608	100.0%	397	100.0%	15,608	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	3	100.0%	1,443	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	100.0%	1,443	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	1,443	100.0%	3	100.0%	1,443	100.0%
HMDA Totals								
Low	1	0.1%	5	0.0%	96	7.8%	3,045	2.3%
Moderate	239	19.4%	18,959	14.2%	198	16.1%	9,910	7.4%
Low/Moderate Total	240	19.5%	18,964	14.2%	294	23.8%	12,955	9.7%
Middle	768	62.3%	79,803	59.6%	251	20.4%	18,759	14.0%
Upper	225	18.2%	35,020	26.2%	624	50.6%	90,383	67.6%
Unknown	0	0.0%	0	0.0%	64	5.2%	11,690	8.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,233	100.0%	133,787	100.0%	1,233	100.0%	133,787	100.0%

HMDA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group Non Metropolitan Kentucky 2015

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	24	5.7%	1,270	2.3%
Moderate	67	16.0%	7,439	13.6%	68	16.3%	4,188	7.6%
Low/Moderate Total	67	16.0%	7,439	13.6%	92	22.0%	5,458	9.9%
Middle	246	58.9%	30,166	54.9%	90	21.5%	8,060	14.7%
Upper	105	25.1%	17,294	31.5%	206	49.3%	36,534	66.5%
Unknown	0	0.0%	0	0.0%	30	7.2%	4,847	8.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	418	100.0%	54,899	100.0%	418	100.0%	54,899	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	11	3.7%	423	1.1%
Moderate	53	17.7%	6,415	16.3%	37	12.4%	2,857	7.3%
Low/Moderate Total	53	17.7%	6,415	16.3%	48	16.1%	3,280	8.4%
Middle	196	65.6%	24,974	63.6%	63	21.1%	6,345	16.2%
Upper	50	16.7%	7,860	20.0%	181	60.5%	27,482	70.0%
Unknown	0	0.0%	0	0.0%	7	2.3%	2,142	5.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	299	100.0%	39,249	100.0%	299	100.0%	39,249	100.0%
	Home Improvement							
Low	2	0.5%	73	0.5%	58	13.8%	732	5.3%
Moderate	96	22.8%	2,630	18.9%	89	21.1%	1,496	10.7%
Low/Moderate Total	98	23.3%	2,703	19.4%	147	34.9%	2,228	16.0%
Middle	275	65.3%	9,850	70.8%	106	25.2%	3,328	23.9%
Upper	48	11.4%	1,365	9.8%	163	38.7%	8,167	58.7%
Unknown	0	0.0%	0	0.0%	5	1.2%	195	1.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	421	100.0%	13,918	100.0%	421	100.0%	13,918	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	4	44.4%	2,731	59.0%	0	0.0%	0	0.0%
Upper	5	55.6%	1,897	41.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	9	100.0%	4,628	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	4,628	100.0%	9	100.0%	4,628	100.0%
	HMDA Totals							
Low	2	0.2%	73	0.1%	93	8.1%	2,425	2.2%
Moderate	216	18.8%	16,484	14.6%	194	16.9%	8,541	7.6%
Low/Moderate Total	218	19.0%	16,557	14.7%	287	25.0%	10,966	9.7%
Middle	721	62.9%	67,721	60.1%	259	22.6%	17,733	15.7%
Upper	208	18.1%	28,416	25.2%	550	48.0%	72,183	64.1%
Unknown	0	0.0%	0	0.0%	51	4.4%	11,812	10.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,147	100.0%	112,694	100.0%	1,147	100.0%	112,694	100.0%

HMDA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group :Lexington Fayette KY MSA #30460 2017

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	7	4.9%	821	3.1%	10	7.0%	1,003	3.8%
Moderate	22	15.4%	2,224	8.5%	25	17.5%	2,930	11.2%
Low/Moderate Total	29	20.3%	3,045	11.6%	35	24.5%	3,933	15.0%
Middle	74	51.7%	12,575	48.1%	22	15.4%	3,502	13.4%
Upper	40	28.0%	10,535	40.3%	55	38.5%	14,919	57.0%
Unknown	0	0.0%	0	0.0%	31	21.7%	3,801	14.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	143	100.0%	26,155	100.0%	143	100.0%	26,155	100.0%
	Refinance							
Low	5	8.8%	363	2.6%	6	10.5%	418	3.0%
Moderate	12	21.1%	1,127	8.0%	6	10.5%	687	4.9%
Low/Moderate Total	17	29.8%	1,490	10.6%	12	21.1%	1,105	7.8%
Middle	20	35.1%	3,272	23.2%	11	19.3%	1,493	10.6%
Upper	20	35.1%	9,323	66.2%	23	40.4%	5,640	40.0%
Unknown	0	0.0%	0	0.0%	11	19.3%	5,847	41.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	57	100.0%	14,085	100.0%	57	100.0%	14,085	100.0%
	Home Improvement							
Low	3	8.1%	205	9.0%	6	16.2%	216	9.5%
Moderate	9	24.3%	255	11.2%	6	16.2%	383	16.8%
Low/Moderate Total	12	32.4%	460	20.2%	12	32.4%	599	26.3%
Middle	18	48.6%	825	36.2%	5	13.5%	51	2.2%
Upper	7	18.9%	996	43.7%	15	40.5%	1,312	57.5%
Unknown	0	0.0%	0	0.0%	5	13.5%	319	14.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	37	100.0%	2,281	100.0%	37	100.0%	2,281	100.0%
	Multi-Family							
Low	1	25.0%	7,824	72.0%	0	0.0%	0	0.0%
Moderate	1	25.0%	1,923	17.7%	0	0.0%	0	0.0%
Low/Moderate Total	2	50.0%	9,747	89.7%	0	0.0%	0	0.0%
Middle	2	50.0%	1,119	10.3%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	4	100.0%	10,866	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	10,866	100.0%	4	100.0%	10,866	100.0%
	HMDA Totals							
Low	16	6.6%	9,213	17.3%	22	9.1%	1,637	3.1%
Moderate	44	18.3%	5,529	10.4%	37	15.4%	4,000	7.5%
Low/Moderate Total	60	24.9%	14,742	27.6%	59	24.5%	5,637	10.6%
Middle	114	47.3%	17,791	33.3%	38	15.8%	5,046	9.5%
Upper	67	27.8%	20,854	39.1%	93	38.6%	21,871	41.0%
Unknown	0	0.0%	0	0.0%	51	21.2%	20,833	39.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	241	100.0%	53,387	100.0%	241	100.0%	53,387	100.0%

*Information based on 2015 ACS data

HMDA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group Lexington Fayette KY MSA #30460 2016

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	13	9.1%	1,309	5.5%	11	7.7%	1,114	4.7%
Moderate	22	15.4%	2,840	11.9%	19	13.3%	2,474	10.3%
Low/Moderate Total	35	24.5%	4,149	17.3%	30	21.0%	3,588	15.0%
Middle	61	42.7%	9,331	39.0%	18	12.6%	2,813	11.8%
Upper	47	32.9%	10,447	43.7%	62	43.4%	12,719	53.2%
Unknown	0	0.0%	0	0.0%	33	23.1%	4,807	20.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	143	100.0%	23,927	100.0%	143	100.0%	23,927	100.0%
Refinance								
Low	6	9.1%	491	4.6%	5	7.6%	462	4.4%
Moderate	4	6.1%	339	3.2%	13	19.7%	1,458	13.8%
Low/Moderate Total	10	15.2%	830	7.9%	18	27.3%	1,920	18.2%
Middle	25	37.9%	4,064	38.4%	18	27.3%	2,433	23.0%
Upper	31	47.0%	5,678	53.7%	27	40.9%	5,912	55.9%
Unknown	0	0.0%	0	0.0%	3	4.5%	307	2.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	66	100.0%	10,572	100.0%	66	100.0%	10,572	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	3	10.7%	90	5.6%
Moderate	7	25.0%	401	24.9%	13	46.4%	425	26.4%
Low/Moderate Total	7	25.0%	401	24.9%	16	57.1%	515	32.0%
Middle	14	50.0%	536	33.3%	5	10.7%	287	17.8%
Upper	7	25.0%	672	41.8%	8	28.6%	767	47.7%
Unknown	0	0.0%	0	0.0%	1	3.6%	40	2.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	1,609	100.0%	28	100.0%	1,609	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	6	85.7%	6,754	95.1%	0	0.0%	0	0.0%
Low/Moderate Total	6	85.7%	6,754	95.1%	0	0.0%	0	0.0%
Middle	1	14.3%	348	4.9%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	7	100.0%	7,102	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	7,102	100.0%	7	100.0%	7,102	100.0%
HMDA Totals								
Low	19	7.8%	1,800	4.2%	19	7.8%	1,666	3.9%
Moderate	39	16.0%	10,334	23.9%	45	18.4%	4,357	10.1%
Low/Moderate Total	58	23.8%	12,134	28.1%	64	26.2%	6,023	13.9%
Middle	101	41.4%	14,279	33.0%	39	16.0%	5,533	12.8%
Upper	85	34.8%	16,797	38.9%	97	39.8%	19,398	44.9%
Unknown	0	0.0%	0	0.0%	44	18.0%	12,256	28.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	244	100.0%	43,210	100.0%	244	100.0%	43,210	100.0%

HMDA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group Lexington Fayette KY MSA #30460 2015

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	7	5.1%	979	4.6%	14	10.1%	1,228	5.7%
Moderate	32	23.2%	3,778	17.6%	19	13.8%	2,621	12.2%
Low/Moderate Total	39	28.3%	4,757	22.2%	33	23.9%	3,849	18.0%
Middle	56	40.6%	8,067	37.6%	22	15.9%	2,586	12.1%
Upper	43	31.2%	8,603	40.2%	49	35.5%	10,384	48.5%
Unknown	0	0.0%	0	0.0%	34	24.6%	4,608	21.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	138	100.0%	21,427	100.0%	138	100.0%	21,427	100.0%
Refinance								
Low	6	10.2%	580	5.6%	7	11.9%	527	5.1%
Moderate	11	18.6%	1,651	16.1%	9	15.3%	1,299	12.6%
Low/Moderate Total	17	28.8%	2,231	21.7%	16	27.1%	1,826	17.8%
Middle	29	49.2%	4,491	43.7%	12	20.3%	1,555	15.1%
Upper	13	22.0%	3,553	34.6%	26	44.1%	5,876	57.2%
Unknown	0	0.0%	0	0.0%	5	8.5%	1,018	9.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	59	100.0%	10,275	100.0%	59	100.0%	10,275	100.0%
Home Improvement								
Low	2	5.1%	70	2.2%	6	15.4%	486	15.0%
Moderate	4	10.3%	376	11.6%	9	23.1%	509	15.7%
Low/Moderate Total	6	15.4%	446	13.7%	15	38.5%	995	30.7%
Middle	19	48.7%	1,310	40.4%	10	25.6%	1,101	33.9%
Upper	14	35.9%	1,490	45.9%	11	28.2%	940	29.0%
Unknown	0	0.0%	0	0.0%	3	7.7%	210	6.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	39	100.0%	3,246	100.0%	39	100.0%	3,246	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	60.0%	1,137	36.6%	0	0.0%	0	0.0%
Low/Moderate Total	3	60.0%	1,137	36.6%	0	0.0%	0	0.0%
Middle	2	40.0%	1,972	63.4%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	5	100.0%	3,109	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	3,109	100.0%	5	100.0%	3,109	100.0%
HMDA Totals								
Low	15	6.2%	1,629	4.3%	27	11.2%	2,241	5.9%
Moderate	50	20.7%	6,942	18.2%	37	15.4%	4,429	11.6%
Low/Moderate Total	65	27.0%	8,571	22.5%	64	26.6%	6,670	17.5%
Middle	106	44.0%	15,840	41.6%	44	18.3%	5,242	13.8%
Upper	70	29.0%	13,646	35.9%	86	35.7%	17,200	45.2%
Unknown	0	0.0%	0	0.0%	47	19.5%	8,945	23.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	241	100.0%	38,057	100.0%	241	100.0%	38,057	100.0%

HMDA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group :Knoxville TN MSA #28940 2017

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	3	5.3%	229	2.2%
Moderate	36	63.2%	6,411	61.5%	8	14.0%	1,121	10.8%
Low/Moderate Total	36	63.2%	6,411	61.5%	11	19.3%	1,350	13.0%
Middle	18	31.6%	3,509	33.7%	12	21.1%	1,476	14.2%
Upper	3	5.3%	503	4.8%	32	56.1%	7,068	67.8%
Unknown	0	0.0%	0	0.0%	2	3.5%	529	5.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	57	100.0%	10,423	100.0%	57	100.0%	10,423	100.0%
Refinance								
Low	0	0.0%	0	0.0%	6	37.5%	222	16.1%
Moderate	11	68.8%	728	52.8%	5	31.3%	362	26.3%
Low/Moderate Total	11	68.8%	728	52.8%	11	68.8%	584	42.4%
Middle	5	31.3%	650	47.2%	1	6.3%	40	2.9%
Upper	0	0.0%	0	0.0%	4	25.0%	754	54.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	1,378	100.0%	16	100.0%	1,378	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	1	8.3%	6	0.6%
Moderate	8	66.7%	737	76.3%	4	33.3%	267	27.6%
Low/Moderate Total	8	66.7%	737	76.3%	5	41.7%	273	28.3%
Middle	4	33.3%	229	23.7%	4	33.3%	310	32.1%
Upper	0	0.0%	0	0.0%	3	25.0%	383	39.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	966	100.0%	12	100.0%	966	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	10	11.8%	457	3.6%
Moderate	55	64.7%	7,876	61.7%	17	20.0%	1,750	13.7%
Low/Moderate Total	55	64.7%	7,876	61.7%	27	31.8%	2,207	17.3%
Middle	27	31.8%	4,388	34.4%	17	20.0%	1,826	14.3%
Upper	3	3.5%	503	3.9%	39	45.9%	8,205	64.3%
Unknown	0	0.0%	0	0.0%	2	2.4%	529	4.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	85	100.0%	12,767	100.0%	85	100.0%	12,767	100.0%

*Information based on 2015 ACS data

HMDA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group :Knoxville TN MSA #28940 2016

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	3	8.8%	338	6.1%	2	5.9%	135	2.5%
Moderate	7	20.6%	733	13.3%	6	17.6%	813	14.8%
Low/Moderate Total	10	29.4%	1,071	19.5%	8	23.5%	948	17.2%
Middle	20	58.8%	3,998	72.6%	6	17.6%	723	13.1%
Upper	4	11.8%	435	7.9%	18	52.9%	3,256	59.2%
Unknown	0	0.0%	0	0.0%	2	5.9%	577	10.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	34	100.0%	5,504	100.0%	34	100.0%	5,504	100.0%
Refinance								
Low	1	3.2%	54	1.4%	3	9.7%	220	5.6%
Moderate	8	25.8%	692	17.5%	7	22.6%	715	18.1%
Low/Moderate Total	9	29.0%	746	18.9%	10	32.3%	935	23.7%
Middle	20	64.5%	2,647	67.0%	12	38.7%	1,662	42.1%
Upper	2	6.5%	557	14.1%	8	25.8%	1,310	33.2%
Unknown	0	0.0%	0	0.0%	1	3.2%	43	1.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	31	100.0%	3,950	100.0%	31	100.0%	3,950	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	6	40.0%	159	17.3%
Moderate	11	73.3%	644	69.9%	3	20.0%	115	12.5%
Low/Moderate Total	11	73.3%	644	69.9%	9	60.0%	274	29.8%
Middle	4	26.7%	277	30.1%	3	20.0%	254	27.6%
Upper	0	0.0%	0	0.0%	3	20.0%	393	42.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	921	100.0%	15	100.0%	921	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	4	5.0%	392	3.8%	11	13.8%	514	5.0%
Moderate	26	32.5%	2,069	19.9%	16	20.0%	1,643	15.8%
Low/Moderate Total	30	37.5%	2,461	23.7%	27	33.8%	2,157	20.8%
Middle	44	55.0%	6,922	66.7%	21	26.3%	2,639	25.4%
Upper	6	7.5%	992	9.6%	29	36.3%	4,959	47.8%
Unknown	0	0.0%	0	0.0%	3	3.8%	620	6.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	80	100.0%	10,375	100.0%	80	100.0%	10,375	100.0%

HMDA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group: Knoxville TN MSA #28940 2015

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	1	2.8%	15	0.3%	6	16.7%	354	7.8%
Moderate	16	44.4%	2,028	44.9%	8	22.2%	766	17.0%
Low/Moderate Total	17	47.2%	2,043	45.3%	14	38.9%	1,120	24.8%
Middle	17	47.2%	2,117	46.9%	8	22.2%	882	19.5%
Upper	2	5.6%	353	7.8%	13	36.1%	2,495	55.3%
Unknown	0	0.0%	0	0.0%	1	2.8%	16	0.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	36	100.0%	4,513	100.0%	36	100.0%	4,513	100.0%
Refinance								
Low	1	3.8%	32	1.0%	4	15.4%	195	5.9%
Moderate	9	34.6%	971	29.5%	6	23.1%	436	13.3%
Low/Moderate Total	10	38.5%	1,003	30.5%	10	38.5%	631	19.2%
Middle	16	61.5%	2,284	69.5%	7	26.9%	1,345	40.9%
Upper	0	0.0%	0	0.0%	9	34.6%	1,311	39.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	3,287	100.0%	26	100.0%	3,287	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	2	13.3%	7	0.7%
Moderate	6	40.0%	315	33.6%	4	26.7%	124	13.2%
Low/Moderate Total	6	40.0%	315	33.6%	6	40.0%	131	14.0%
Middle	9	60.0%	622	66.4%	6	40.0%	354	37.8%
Upper	0	0.0%	0	0.0%	3	20.0%	452	48.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	937	100.0%	15	100.0%	937	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	2	2.6%	47	0.5%	12	15.6%	556	6.4%
Moderate	31	40.3%	3,314	37.9%	18	23.4%	1,326	15.2%
Low/Moderate Total	33	42.9%	3,361	38.5%	30	39.0%	1,882	21.5%
Middle	42	54.5%	5,023	57.5%	21	27.3%	2,581	29.5%
Upper	2	2.6%	353	4.0%	25	32.5%	4,258	48.7%
Unknown	0	0.0%	0	0.0%	1	1.3%	16	0.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	77	100.0%	8,737	100.0%	77	100.0%	8,737	100.0%

HMDA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group :Non Metropolitan West Virginia 2017

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	7.7%	70	7.1%	3	23.1%	98	9.9%
Low/Moderate Total	1	7.7%	70	7.1%	3	23.1%	98	9.9%
Middle	12	92.3%	918	92.9%	2	15.4%	172	17.4%
Upper	0	0.0%	0	0.0%	8	61.5%	718	72.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	988	100.0%	13	100.0%	988	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	14.3%	100	21.9%
Low/Moderate Total	0	0.0%	0	0.0%	1	14.3%	100	21.9%
Middle	7	100.0%	456	100.0%	3	42.9%	150	32.9%
Upper	0	0.0%	0	0.0%	3	42.9%	206	45.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	456	100.0%	7	100.0%	456	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	3	9.4%	11	1.1%
Moderate	3	9.4%	14	1.5%	5	15.6%	211	21.9%
Low/Moderate Total	3	9.4%	14	1.5%	8	25.0%	222	23.1%
Middle	26	81.3%	920	95.5%	13	40.6%	324	33.6%
Upper	3	9.4%	29	3.0%	11	34.4%	417	43.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	32	100.0%	963	100.0%	32	100.0%	963	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	3	5.8%	11	0.5%
Moderate	4	7.7%	84	3.5%	9	17.3%	409	17.0%
Low/Moderate Total	4	7.7%	84	3.5%	12	23.1%	420	17.4%
Middle	45	86.5%	2,294	95.3%	18	34.6%	646	26.8%
Upper	3	5.8%	29	1.2%	22	42.3%	1,341	55.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	52	100.0%	2,407	100.0%	52	100.0%	2,407	100.0%

*Information based on 2015 ACS data

HMDA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group :Non Metropolitan West Virginia 2016

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	1	9.1%	48	3.5%
Moderate	0	0.0%	0	0.0%	1	9.1%	30	2.2%
Low/Moderate Total	0	0.0%	0	0.0%	2	18.2%	78	5.7%
Middle	11	100.0%	1,360	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	9	81.8%	1,282	94.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	1,360	100.0%	11	100.0%	1,360	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	14.3%	111	9.7%
Low/Moderate Total	0	0.0%	0	0.0%	1	14.3%	111	9.7%
Middle	7	100.0%	1,147	100.0%	1	14.3%	71	6.2%
Upper	0	0.0%	0	0.0%	5	71.4%	965	84.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	1,147	100.0%	7	100.0%	1,147	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	5	14.3%	21	7.2%
Moderate	0	0.0%	0	0.0%	11	31.4%	85	29.1%
Low/Moderate Total	0	0.0%	0	0.0%	16	45.7%	106	36.3%
Middle	35	100.0%	292	100.0%	10	28.6%	40	13.7%
Upper	0	0.0%	0	0.0%	9	25.7%	146	50.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	35	100.0%	292	100.0%	35	100.0%	292	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	6	11.3%	69	2.5%
Moderate	0	0.0%	0	0.0%	13	24.5%	226	8.1%
Low/Moderate Total	0	0.0%	0	0.0%	19	35.8%	295	10.5%
Middle	53	100.0%	2,799	100.0%	11	20.8%	111	4.0%
Upper	0	0.0%	0	0.0%	23	43.4%	2,393	85.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	53	100.0%	2,799	100.0%	53	100.0%	2,799	100.0%

HMDA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group Non Metropolitan West Virginia 2015

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	2	14.3%	99	7.7%
Moderate	0	0.0%	0	0.0%	2	14.3%	160	12.4%
Low/Moderate Total	0	0.0%	0	0.0%	4	28.6%	259	20.0%
Middle	14	100.0%	1,292	100.0%	1	7.1%	116	9.0%
Upper	0	0.0%	0	0.0%	8	57.1%	775	60.0%
Unknown	0	0.0%	0	0.0%	1	7.1%	142	11.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	1,292	100.0%	14	100.0%	1,292	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	2	18.2%	149	16.5%
Moderate	0	0.0%	0	0.0%	3	27.3%	163	18.0%
Low/Moderate Total	0	0.0%	0	0.0%	5	45.5%	312	34.5%
Middle	11	100.0%	904	100.0%	2	18.2%	132	14.6%
Upper	0	0.0%	0	0.0%	4	36.4%	460	50.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	904	100.0%	11	100.0%	904	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	3	6.8%	9	0.9%
Moderate	0	0.0%	0	0.0%	8	18.2%	49	4.8%
Low/Moderate Total	0	0.0%	0	0.0%	11	25.0%	58	5.7%
Middle	44	100.0%	1,011	100.0%	12	27.3%	406	40.2%
Upper	0	0.0%	0	0.0%	19	43.2%	413	40.9%
Unknown	0	0.0%	0	0.0%	2	4.5%	134	13.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	44	100.0%	1,011	100.0%	44	100.0%	1,011	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	7	10.1%	257	8.0%
Moderate	0	0.0%	0	0.0%	13	18.8%	372	11.6%
Low/Moderate Total	0	0.0%	0	0.0%	20	29.0%	629	19.6%
Middle	69	100.0%	3,207	100.0%	15	21.7%	654	20.4%
Upper	0	0.0%	0	0.0%	31	44.9%	1,648	51.4%
Unknown	0	0.0%	0	0.0%	3	4.3%	276	8.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	69	100.0%	3,207	100.0%	69	100.0%	3,207	100.0%

CRA Loan Distribution Table												
Exam: Community Trust Bank 2019												
Assessment Area/Group: Huntington Ashland WV KY OH MSA #26580 2017												
Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income												
Low	1	1.6%	305	3.8%	0	0.0%	0	0.0%	1	25.0%	63	32.5%
Moderate	19	30.6%	2,413	29.8%	0	0.0%	0	0.0%	1	25.0%	40	20.6%
Low/Moderate Total	20	32.3%	2,718	33.5%	0	0.0%	0	0.0%	2	50.0%	103	53.1%
Middle	33	53.2%	4,985	61.5%	1	100.0%	99	100.0%	1	25.0%	50	25.8%
Upper	9	14.5%	401	4.9%	0	0.0%	0	0.0%	1	25.0%	41	21.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	62	100.0%	8,104	100.0%	1	100.0%	99	100.0%	4	100.0%	194	100.0%
By Revenue												
Total \$1 Million or Less	36	58.1%	5,529	68.2%	1	100.0%	99	100.0%	4	100.0%	194	100.0%
Over \$1 Million	25	40.3%	2,550	31.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	1	1.6%	25	0.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	62	100.0%	8,104	100.0%	1	100.0%	99	100.0%	4	100.0%	194	100.0%
By Loan Size												
\$100,000 or less	35	56.5%	1,508	18.6%	1	100.0%	99	100.0%	4	100.0%	194	100.0%
\$100,001 - \$250,000	21	33.9%	3,362	41.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	9.7%	3,234	39.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	62	100.0%	8,104	100.0%	1	100.0%	99	100.0%	4	100.0%	194	100.0%
By Loan Size and Revenue \$1 Million or Less												
\$100,000 or less	19	52.8%	754	13.6%	1	100.0%	99	100.0%	4	100.0%	194	100.0%
\$100,001 - \$250,000	13	36.1%	2,146	38.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	4	11.1%	2,629	47.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	36	100.0%	5,529	100.0%	1	100.0%	99	100.0%	4	100.0%	194	100.0%

CRA Loan Distribution Table

Exam: Community Trust Bank 2019

CRA Loan Distribution Table												
Exam: Community Trust Bank 2019												
Assessment Area/Group: Huntington Ashland WV KY OH MSA #26580 2016												
Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income												
Low	16	32.0%	2,465	29.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	5	10.0%	1,314	15.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	21	42.0%	3,779	44.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	17	34.0%	3,376	40.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	12	24.0%	1,267	15.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	50	100.0%	8,422	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
By Revenue												
Total \$1 Million or Less	32	64.0%	5,704	67.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	15	30.0%	2,300	27.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	3	6.0%	418	5.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	50	100.0%	8,422	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
By Loan Size												
\$100,000 or less	30	60.0%	1,107	13.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	8	16.0%	1,254	14.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	12	24.0%	6,061	72.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	50	100.0%	8,422	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less												
\$100,000 or less	19	59.4%	623	10.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	5	15.6%	782	13.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	8	25.0%	4,299	75.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	32	100.0%	5,704	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group: Huntington Ashland WV KY OH MSA #26580 2015

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	15	25.4%	2,562	34.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	6.8%	263	3.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	19	32.2%	2,825	38.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	22	37.5%	2,304	33.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	18	30.5%	2,093	28.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	59	100.0%	7,422	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	42	71.2%	4,658	62.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	14	23.7%	2,124	28.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	3	5.1%	640	8.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	59	100.0%	7,422	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	44	74.6%	2,243	30.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	5	8.5%	867	11.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	10	16.9%	4,312	58.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	59	100.0%	7,422	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	33	78.6%	1,512	32.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	7.1%	604	13.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	14.3%	2,542	54.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	42	100.0%	4,658	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group: Non Metropolitan Kentucky 2017

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	29	8.7%	3,643	10.7%	11	9.9%	706	11.6%	3	7.5%	201	3.9%
Low/Moderate Total	29	8.7%	3,643	10.7%	11	9.9%	706	11.6%	3	7.5%	201	3.9%
Middle	239	72.0%	25,429	74.6%	80	72.1%	4,594	75.2%	27	67.5%	3,846	74.3%
Upper	64	19.3%	4,995	14.7%	20	18.0%	808	13.2%	10	25.0%	1,130	21.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	332	100.0%	34,067	100.0%	111	100.0%	6,108	100.0%	40	100.0%	5,177	100.0%
	By Revenue											
Total \$1 Million or Less	205	61.7%	20,507	60.2%	97	87.4%	5,287	86.6%	29	72.5%	3,819	73.8%
Over \$1 Million	76	22.9%	9,574	28.1%	5	4.5%	189	3.1%	3	7.5%	665	12.8%
Not Known	51	15.4%	3,986	11.7%	9	8.1%	632	10.3%	8	20.0%	693	13.4%
Total	332	100.0%	34,067	100.0%	111	100.0%	6,108	100.0%	40	100.0%	5,177	100.0%
	By Loan Size											
\$100,000 or less	250	75.3%	9,516	27.9%	94	84.7%	3,206	52.5%	25	62.5%	1,473	28.5%
\$100,001 - \$250,000	48	14.5%	8,163	24.0%	17	15.3%	2,902	47.5%	10	25.0%	1,636	31.6%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	34	10.2%	16,388	48.1%	0	0.0%	0	0.0%	5	12.5%	2,068	39.9%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	332	100.0%	34,067	100.0%	111	100.0%	6,108	100.0%	40	100.0%	5,177	100.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	160	78.0%	6,248	30.5%	81	83.5%	2,635	49.8%	18	62.1%	1,065	27.9%
\$100,001 - \$250,000	26	12.7%	4,361	21.3%	16	16.5%	2,652	50.2%	7	24.1%	1,166	30.5%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	19	9.3%	9,898	48.3%	0	0.0%	0	0.0%	4	13.8%	1,588	41.6%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	205	100.0%	20,507	100.0%	97	100.0%	5,287	100.0%	29	100.0%	3,819	100.0%

*Information based on 2015 ACS data

CRA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group: Non Metropolitan Kentucky 2016												
Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	54	14.7%	5,081	12.2%	14	17.1%	876	16.3%	0	0.0%	0	0.0%
Low/Moderate Total	54	14.7%	5,081	12.2%	14	17.1%	876	16.3%	0	0.0%	0	0.0%
Middle	233	60.6%	25,744	62.0%	47	57.3%	2,673	49.7%	0	0.0%	0	0.0%
Upper	91	24.7%	10,672	25.7%	21	25.6%	1,829	34.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	368	100.0%	41,497	100.0%	82	100.0%	5,378	100.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	238	64.7%	25,253	60.9%	74	90.2%	5,100	94.8%	0	0.0%	0	0.0%
Over \$1 Million	86	23.4%	12,142	29.3%	1	1.2%	27	0.5%	0	0.0%	0	0.0%
Not Known	44	12.0%	4,102	9.9%	7	8.5%	251	4.7%	0	0.0%	0	0.0%
Total	368	100.0%	41,497	100.0%	82	100.0%	5,378	100.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	262	71.2%	10,185	24.5%	66	80.5%	2,546	47.3%	0	0.0%	0	0.0%
\$100,001 - \$250,000	65	17.7%	10,298	24.8%	13	15.9%	1,760	32.7%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	41	11.1%	21,014	50.6%	3	3.7%	1,072	19.9%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	368	100.0%	41,497	100.0%	82	100.0%	5,378	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	171	71.8%	6,220	24.6%	58	78.4%	2,268	44.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	42	17.6%	6,517	25.8%	13	17.6%	1,760	34.5%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	25	10.5%	12,516	49.6%	3	4.1%	1,072	21.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	238	100.0%	25,253	100.0%	74	100.0%	5,100	100.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group: Non Metropolitan Kentucky 2015												
Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	53	14.9%	4,693	13.2%	16	18.6%	469	9.4%	0	0.0%	0	0.0%
Low/Moderate Total	53	14.9%	4,693	13.2%	16	18.6%	469	9.4%	0	0.0%	0	0.0%
Middle	216	60.8%	25,114	65.1%	50	58.1%	2,773	55.9%	0	0.0%	0	0.0%
Upper	86	24.2%	7,707	21.7%	20	23.3%	1,723	34.7%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	355	100.0%	35,514	100.0%	86	100.0%	4,965	100.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	219	61.7%	19,608	55.2%	74	86.0%	4,030	81.2%	0	0.0%	0	0.0%
Over \$1 Million	72	20.3%	9,700	27.3%	2	2.3%	260	5.2%	0	0.0%	0	0.0%
Not Known	64	18.0%	6,206	17.5%	10	11.6%	675	13.6%	0	0.0%	0	0.0%
Total	355	100.0%	35,514	100.0%	86	100.0%	4,965	100.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	261	73.5%	9,146	25.8%	71	82.6%	2,036	41.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	58	16.3%	10,275	28.9%	14	16.3%	2,454	49.4%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	36	10.1%	16,093	45.3%	1	1.2%	475	9.6%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	355	100.0%	35,514	100.0%	86	100.0%	4,965	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	168	76.7%	5,743	29.3%	63	85.1%	1,799	44.6%	0	0.0%	0	0.0%
\$100,001 - \$250,000	30	13.7%	5,016	25.6%	10	13.5%	1,756	43.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	21	9.6%	8,849	45.1%	1	1.4%	475	11.8%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	219	100.0%	19,608	100.0%	74	100.0%	4,030	100.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table												
Exam: Community Trust Bank 2019												
Assessment Area/Group: Lexington Fayette KY MSA #30460 2017												
Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	9	6.8%	495	2.5%	1	8.3%	14	1.8%	1	7.7%	500	24.8%
Moderate	26	19.5%	2,447	12.2%	1	8.3%	11	1.4%	5	38.5%	904	44.9%
Low/Moderate Total	35	26.3%	2,942	14.7%	2	16.7%	25	3.2%	6	46.2%	1,404	69.7%
Middle	37	27.8%	7,614	38.0%	7	58.3%	551	69.6%	7	53.8%	611	30.3%
Upper	61	45.9%	9,476	47.3%	3	25.0%	216	27.3%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	133	100.0%	20,032	100.0%	12	100.0%	792	100.0%	13	100.0%	2,015	100.0%
	By Revenue											
Total \$1 Million or Less	71	53.4%	9,018	45.0%	11	91.7%	737	93.1%	12	92.3%	1,515	75.2%
Over \$1 Million	57	42.9%	10,656	53.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	5	3.8%	358	1.8%	1	8.3%	55	6.9%	1	7.7%	500	24.8%
Total	133	100.0%	20,032	100.0%	12	100.0%	792	100.0%	13	100.0%	2,015	100.0%
	By Loan Size											
\$100,000 or less	69	51.9%	3,173	15.8%	9	75.0%	352	44.4%	6	46.2%	235	11.7%
\$100,001 - \$250,000	45	33.8%	7,441	37.1%	3	25.0%	440	55.6%	5	38.5%	732	36.3%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	19	14.3%	9,418	47.0%	0	0.0%	0	0.0%	2	15.4%	1,048	52.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	133	100.0%	20,032	100.0%	12	100.0%	792	100.0%	13	100.0%	2,015	100.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	48	67.6%	2,042	22.6%	8	72.7%	297	40.3%	6	50.0%	235	15.5%
\$100,001 - \$250,000	16	22.5%	2,847	31.6%	3	27.3%	440	59.7%	5	41.7%	732	48.3%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	7	9.9%	4,129	45.8%	0	0.0%	0	0.0%	1	8.3%	548	36.2%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	71	100.0%	9,018	100.0%	11	100.0%	737	100.0%	12	100.0%	1,515	100.0%

*Information based on 2015 ACS data

CRA Loan Distribution Table

Exam: Community Trust Bank 2019

CRA Loan Distribution Table												
Exam: Community Trust Bank 2019												
Assessment Area/Group: Lexington Fayette KY MSA #30460 2016												
Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	9	7.8%	555	2.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	26	22.4%	4,576	24.2%	1	5.0%	18	1.0%	0	0.0%	0	0.0%
Low/Moderate Total	35	30.2%	5,131	27.1%	1	5.0%	18	1.0%	0	0.0%	0	0.0%
Middle	59	53.6%	6,392	34.8%	18	90.0%	1,704	91.0%	0	0.0%	0	0.0%
Upper	42	36.2%	7,218	38.1%	1	5.0%	150	8.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	116	100.0%	18,941	100.0%	20	100.0%	1,872	100.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	62	53.4%	6,929	36.6%	14	70.0%	1,743	93.1%	0	0.0%	0	0.0%
Over \$1 Million	47	40.5%	9,286	49.0%	6	30.0%	129	6.9%	0	0.0%	0	0.0%
Not Known	7	6.0%	2,726	14.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	116	100.0%	18,941	100.0%	20	100.0%	1,872	100.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	70	60.3%	3,253	17.2%	15	75.0%	495	26.4%	0	0.0%	0	0.0%
\$100,001 - \$250,000	24	20.7%	4,043	21.3%	3	15.0%	377	20.1%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	22	19.0%	11,645	61.5%	2	10.0%	1,000	53.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	116	100.0%	18,941	100.0%	20	100.0%	1,872	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	46	74.2%	1,578	22.8%	9	64.3%	366	21.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	10	16.1%	1,656	23.9%	3	21.4%	377	21.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	9.7%	3,695	53.3%	2	14.3%	1,000	57.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	62	100.0%	6,929	100.0%	14	100.0%	1,743	100.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group: Lexington Fayette KY MSA #30460 2015

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	7	6.4%	1,142	7.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	23	20.9%	3,211	19.7%	1	7.7%	34	2.5%	0	0.0%	0	0.0%
Low/Moderate Total	30	27.3%	4,353	26.6%	1	7.7%	34	2.5%	0	0.0%	0	0.0%
Middle	43	39.1%	8,483	51.9%	6	46.2%	941	70.2%	0	0.0%	0	0.0%
Upper	37	33.6%	3,503	21.4%	6	46.2%	366	27.3%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	110	100.0%	16,339	100.0%	13	100.0%	1,341	100.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	53	48.2%	7,651	46.8%	7	53.8%	705	52.6%	0	0.0%	0	0.0%
Over \$1 Million	34	30.9%	4,745	29.0%	2	15.4%	292	21.8%	0	0.0%	0	0.0%
Not Known	23	20.9%	3,943	24.1%	4	30.8%	344	25.7%	0	0.0%	0	0.0%
Total	110	100.0%	16,339	100.0%	13	100.0%	1,341	100.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	63	57.3%	2,627	16.1%	7	53.8%	221	16.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	28	25.5%	4,708	28.8%	5	38.5%	825	61.5%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	19	17.3%	9,004	55.1%	1	7.7%	295	22.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	110	100.0%	16,339	100.0%	13	100.0%	1,341	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	36	67.9%	1,434	18.7%	4	57.1%	172	24.4%	0	0.0%	0	0.0%
\$100,001 - \$250,000	9	17.0%	1,670	21.8%	3	42.9%	533	75.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	8	15.1%	4,547	59.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	53	100.0%	7,651	100.0%	7	100.0%	705	100.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table

Exam: Community Trust Bank 2019

Assessment Area/Group: Knoxville TN MSA #28940 2017

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	17	56.7%	2,370	55.9%	0	0.0%	0	0.0%	1	100.0%	92	100.0%
Low/Moderate Total	17	56.7%	2,370	55.9%	0	0.0%	0	0.0%	1	100.0%	92	100.0%
Middle	12	40.0%	1,835	43.3%	1	100.0%	15	100.0%	0	0.0%	0	0.0%
Upper	1	3.3%	36	0.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	30	100.0%	4,241	100.0%	1	100.0%	15	100.0%	1	100.0%	92	100.0%
	By Revenue											
Total \$1 Million or Less	12	40.0%	995	23.5%	1	100.0%	15	100.0%	1	100.0%	92	100.0%
Over \$1 Million	10	33.3%	2,759	65.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	8	26.7%	487	11.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	30	100.0%	4,241	100.0%	1	100.0%	15	100.0%	1	100.0%	92	100.0%
	By Loan Size											
\$100,000 or less	19	63.3%	682	16.1%	1	100.0%	15	100.0%	1	100.0%	92	100.0%
\$100,001 - \$250,000	6	20.0%	989	23.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	5	16.7%	2,570	60.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	30	100.0%	4,241	100.0%	1	100.0%	15	100.0%	1	100.0%	92	100.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	10	83.3%	357	35.9%	1	100.0%	15	100.0%	1	100.0%	92	100.0%
\$100,001 - \$250,000	1	8.3%	218	21.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	8.3%	420	42.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	995	100.0%	1	100.0%	15	100.0%	1	100.0%	92	100.0%

*Information based on 2015 ACS data

CRA Loan Distribution Table

Exam: Community Trust Bank 2019

Income Categories	Assessment Area/Group: Knoxville TN MSA #28940 2016											
	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	3	11.1%	97	3.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	14	51.9%	1,639	63.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	17	63.0%	1,736	66.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	10	37.0%	359	13.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	27	100.0%	2,595	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	12	44.4%	1,550	59.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	9	33.3%	765	29.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	6	22.2%	280	10.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	27	100.0%	2,595	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	20	74.1%	889	34.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	5	18.5%	824	31.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	7.4%	882	34.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	27	100.0%	2,595	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	7	58.3%	234	15.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	25.0%	434	28.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	16.7%	882	56.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	1,550	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table

Exam: Community Trust Bank 2019

Income Categories	Assessment Area/Group: Knoxville TN MSA #28940 2016											
	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	4	19.0%	255	9.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	6	28.6%	293	11.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	10	47.6%	548	21.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	11	52.4%	2,046	78.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	2,594	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	13	61.9%	1,142	44.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	7	33.3%	1,392	53.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	1	4.8%	60	2.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	2,594	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	17	81.0%	850	32.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	4.8%	110	4.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	14.3%	1,634	63.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	2,594	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	12	92.3%	642	56.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	7.7%	500	43.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	1,142	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table												
Exam: Community Trust Bank 2019												
Assessment Area/Group: Non Metropolitan West Virginia 2017												
Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income												
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	7	46.7%	1,524	71.0%	1	100.0%	25	100.0%	1	100.0%	45	100.0%
Upper	8	53.3%	623	29.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	2,147	100.0%	1	100.0%	25	100.0%	1	100.0%	45	100.0%
By Revenue												
Total \$1 Million or Less	9	60.0%	1,768	82.3%	1	100.0%	25	100.0%	1	100.0%	45	100.0%
Over \$1 Million	5	33.3%	358	16.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	1	6.7%	21	1.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	2,147	100.0%	1	100.0%	25	100.0%	1	100.0%	45	100.0%
By Loan Size												
\$100,000 or less	10	66.7%	317	14.8%	1	100.0%	25	100.0%	1	100.0%	45	100.0%
\$100,001 - \$250,000	2	13.3%	216	10.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	20.0%	1,614	75.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	2,147	100.0%	1	100.0%	25	100.0%	1	100.0%	45	100.0%
By Loan Size and Revenue \$1 Million or Less												
\$100,000 or less	6	66.7%	154	8.7%	1	100.0%	25	100.0%	1	100.0%	45	100.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	33.3%	1,614	91.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	1,768	100.0%	1	100.0%	25	100.0%	1	100.0%	45	100.0%

*Information based on 2015 ACS data

CRA Loan Distribution Table

Exam: Community Trust Bank 2019

CRA Loan Distribution Table												
Exam: Community Trust Bank 2019												
Assessment Area/Group: Non Metropolitan West Virginia 2016												
Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income												
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	15	100.0%	681	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	681	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
By Revenue												
Total \$1 Million or Less	5	33.3%	213	31.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	8	53.3%	438	64.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	2	13.3%	30	4.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	681	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
By Loan Size												
\$100,000 or less	14	93.3%	482	70.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	6.7%	199	29.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	681	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less												
\$100,000 or less	5	100.0%	213	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	213	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table

Exam: Community Trust Bank 2019

Income Categories	Assessment Area/Group: Non Metropolitan West Virginia 2015											
	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	13	100.0%	1,581	100.0%	1	100.0%	20	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	1,581	100.0%	1	100.0%	20	100.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	9	69.2%	873	55.2%	1	100.0%	20	100.0%	0	0.0%	0	0.0%
Over \$1 Million	2	15.4%	525	33.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	2	15.4%	183	11.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	1,581	100.0%	1	100.0%	20	100.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	8	61.5%	285	18.0%	1	100.0%	20	100.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	23.1%	618	39.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	15.4%	678	42.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	1,581	100.0%	1	100.0%	20	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	7	77.8%	245	28.1%	1	100.0%	20	100.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	11.1%	250	28.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	11.1%	378	43.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	873	100.0%	1	100.0%	20	100.0%	0	0.0%	0	0.0%

APPENDIX E

FULL SCOPE DEMOGRAPHICS TABLES

Combined Demographics Report

Assessment Area(s): Huntington Ashland WV KY OH MSA #26580 2017

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	6	9	3,310	5.3	1,462	44.2	15,536	24.7	
Moderate-income	18	26.9	11,226	17.9	2,841	25.3	10,729	17.1	
Middle-income	30	44.8	36,968	58.8	4,650	12.6	12,556	20	
Upper-income	12	17.9	11,291	18	829	7.3	24,049	38.3	
Unknown-income	1	1.5	75	0.1	44	58.7	0	0	
Total Assessment Area	67	100.0	62,870	100.0	9,826	15.6	62,870	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	%	#	%	#	%	
Low-income	8,784	2,455	3.6	27.9	4,603	52.4	1,726	19.6	
Moderate-income	22,864	11,452	16.8	50.1	7,438	32.5	3,974	17.4	
Middle-income	61,296	40,691	59.8	66.4	13,083	21.3	7,522	12.3	
Upper-income	19,954	13,380	19.7	67.1	4,630	23.2	1,944	9.7	
Unknown-income	586	17	0	2.9	492	84	77	13.1	
Total Assessment Area	113,484	67,995	100.0	59.9	30,246	26.7	15,243	13.4	
	Total Businesses by Tract		Businesses by Tract & Revenue Size						
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
			#	%	#	%	#	%	#
Low-income	906	13	754	12.4	137	18.1	15	12	
Moderate-income	1,351	19.4	1,145	18.8	187	24.8	19	15.2	
Middle-income	3,464	49.7	3,070	50.4	319	42.3	75	60	
Upper-income	1,226	17.6	1,106	18.1	106	14	14	11.2	
Unknown-income	28	0.4	20	0.3	6	0.8	2	1.6	
Total Assessment Area	6,975	100.0	6,095	100.0	755	100.0	125	100.0	
		Percentage of Total Businesses:		87.4		10.8		1.8	
	Total Farms by Tract		Farms by Tract & Revenue Size						
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
			#	%	#	%	#	%	#
Low-income	1	0.8	1	0.8	0	0	0	0	
Moderate-income	15	11.9	15	12	0	0	0	0	
Middle-income	100	79.4	99	79.2	1	100	0	0	
Upper-income	10	7.9	10	8	0	0	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	126	100.0	125	100.0	1	100.0	0	.0	
		Percentage of Total Farms:		99.2		.8		.0	

2017 FFIEC Census Data and 2017 D&B Information

Combined Demographics Report

Assessment Area(s): Huntington Ashland WV KY OH MSA #26580 2016

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	7.5	1,856	2.8	710	38.3	15,526	23.5
Moderate-income	17	25.4	12,186	18.4	3,330	27.3	12,112	18.3
Middle-income	34	50.7	39,248	59.4	5,058	12.9	13,583	20.5
Upper-income	11	16.4	12,811	19.4	918	7.2	24,880	37.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	67	100.0	66,101	100.0	10,016	15.2	66,101	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	5,623	1,293	1.8	23.0	3,112	55.3	1,218	21.7
Moderate-income	23,734	11,784	16.7	49.7	8,473	35.7	3,477	14.6
Middle-income	63,509	42,992	60.8	67.7	13,336	21.0	7,181	11.3
Upper-income	20,767	14,601	20.7	70.3	4,351	21.0	1,815	8.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	113,633	70,670	100.0	62.2	29,272	25.8	13,691	12.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	744	9.4	616	8.8	118	15.4	10	8.0
Moderate-income	1,767	22.4	1,510	21.5	229	30.0	28	22.4
Middle-income	3,642	46.1	3,295	47.0	271	35.5	76	60.8
Upper-income	1,746	22.1	1,589	22.7	146	19.1	11	8.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7,899	100.0	7,010	100.0	764	100.0	125	100.0
Percentage of Total Businesses:			88.7		9.7		1.6	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	17	11.8	17	11.9	0	0.0	0	0.0
Middle-income	100	69.4	99	69.2	1	100.0	0	0.0
Upper-income	27	18.8	27	18.9	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	144	100.0	143	100.0	1	100.0	0	.0
Percentage of Total Farms:			99.3		.7		.0	

2016 FFIEC Census Data and 2016 D&B Information

Combined Demographics Report

Assessment Area(s): Huntington Ashland WV KY OH MSA #26580 2015

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	7.5	1,856	2.8	710	38.3	15,526	23.5
Moderate-income	17	25.4	12,186	18.4	3,330	27.3	12,112	18.3
Middle-income	34	50.7	39,248	59.4	5,058	12.9	13,583	20.5
Upper-income	11	16.4	12,811	19.4	918	7.2	24,880	37.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	67	100.0	66,101	100.0	10,016	15.2	66,101	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	5,623	1,293	1.8	23.0	3,112	55.3	1,218	21.7
Moderate-income	23,734	11,784	16.7	49.7	8,473	35.7	3,477	14.6
Middle-income	63,509	42,992	60.8	67.7	13,336	21.0	7,181	11.3
Upper-income	20,767	14,601	20.7	70.3	4,351	21.0	1,815	8.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	113,633	70,670	100.0	62.2	29,272	25.8	13,691	12.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	827	9.3	709	8.8	113	14.9	5	5.2
Moderate-income	1,972	22.1	1,722	21.4	229	30.3	21	21.6
Middle-income	4,143	46.5	3,809	47.3	270	35.7	64	66.0
Upper-income	1,965	22.1	1,813	22.5	145	19.2	7	7.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	8,907	100.0	8,053	100.0	757	100.0	97	100.0
Percentage of Total Businesses:				90.4		8.5		1.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	22	11.9	22	12.0	0	0.0	0	0.0
Middle-income	123	66.5	122	66.3	1	100.0	0	0.0
Upper-income	40	21.6	40	21.7	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	185	100.0	184	100.0	1	100.0	0	.0
Percentage of Total Farms:				99.5		.5		.0

2015 FFIEC Census Data and 2015 D&B Information

Combined Demographics Report

Assessment Area(s): Non Metropolitan Kentucky 2017

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	2	1.1	1,738	0.9	746	42.9	46,308	24.5	
Moderate-income	33	18.1	27,369	14.5	7,046	25.7	30,663	16.2	
Middle-income	115	63.2	121,836	64.5	23,777	19.5	34,352	18.2	
Upper-income	32	17.6	38,088	20.1	3,822	10	77,708	41.1	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	182	100.0	189,031	100.0	35,391	18.7	189,031	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	3,358	1,504	0.8	44.8	1,303	38.8	551	16.4	
Moderate-income	48,886	27,989	14.5	57.3	12,447	25.5	8,450	17.3	
Middle-income	213,140	124,972	64.6	58.6	58,192	27.3	29,976	14.1	
Upper-income	60,686	39,123	20.2	64.5	15,814	26.1	5,749	9.5	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	326,070	193,588	100.0	59.4	87,756	26.9	44,726	13.7	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	112	0.5	99	0.5	12	0.6	1	0.2	
Moderate-income	2,635	11.5	2,337	11.4	232	12.2	66	14.4	
Middle-income	15,305	66.8	13,695	66.6	1,315	69.2	295	64.4	
Upper-income	4,868	21.2	4,431	21.5	341	17.9	96	21	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	22,920	100.0	20,562	100.0	1,900	100.0	458	100.0	
Percentage of Total Businesses:				89.7		8.3		2.0	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	96	8.8	96	8.9	0	0	0	0	
Middle-income	749	68.8	746	69.1	3	37.5	0	0	
Upper-income	243	22.3	238	22	5	62.5	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	1,088	100.0	1,080	100.0	8	100.0	0	.0	
Percentage of Total Farms:				99.3		.7		.0	

2017 FFIEC Census Data and 2017 D&B Information

Combined Demographics Report

Assessment Area(s): Non Metropolitan Kentucky 2016

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	1.1	781	0.4	344	44.0	45,240	23.6
Moderate-income	34	18.7	32,988	17.2	8,522	25.8	31,508	16.4
Middle-income	104	57.1	111,930	58.4	19,586	17.5	35,028	18.3
Upper-income	42	23.1	45,910	24.0	4,544	9.9	79,833	41.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	182	100.0	191,609	100.0	32,996	17.2	191,609	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	1,441	712	0.4	49.4	604	41.9	125	8.7
Moderate-income	57,027	34,452	17.3	60.4	13,177	23.1	9,398	16.5
Middle-income	190,089	115,302	57.9	60.7	47,616	25.0	27,171	14.3
Upper-income	75,228	48,641	24.4	64.7	18,145	24.1	8,442	11.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	323,785	199,107	100.0	61.5	79,542	24.6	45,136	13.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	180	0.7	158	0.7	20	1.0	2	0.4
Moderate-income	2,954	11.3	2,656	11.2	224	11.6	74	15.4
Middle-income	16,231	62.1	14,676	61.9	1,264	65.2	291	60.5
Upper-income	6,777	25.9	6,232	26.3	431	22.2	114	23.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	26,142	100.0	23,722	100.0	1,939	100.0	481	100.0
Percentage of Total Businesses:			90.7		7.4		1.8	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	121	9.2	121	9.3	0	0.0	0	0.0
Middle-income	820	62.5	817	62.6	3	42.9	0	0.0
Upper-income	371	28.3	367	28.1	4	57.1	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,312	100.0	1,305	100.0	7	100.0	0	.0
Percentage of Total Farms:			99.5		.5		.0	

2016 FFIEC Census Data and 2016 D&B Information

Combined Demographics Report

Assessment Area(s): Non Metropolitan Kentucky 2015

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	1.1	781	0.4	344	44.0	45,240	23.6
Moderate-income	34	18.7	32,988	17.2	8,522	25.8	31,508	16.4
Middle-income	104	57.1	111,930	58.4	19,586	17.5	35,028	18.3
Upper-income	42	23.1	45,910	24.0	4,544	9.9	79,833	41.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	182	100.0	191,609	100.0	32,996	17.2	191,609	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	1,441	712	0.4	49.4	604	41.9	125	8.7
Moderate-income	57,027	34,452	17.3	60.4	13,177	23.1	9,398	16.5
Middle-income	190,089	115,302	57.9	60.7	47,616	25.0	27,171	14.3
Upper-income	75,228	48,641	24.4	64.7	18,145	24.1	8,442	11.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	323,785	199,107	100.0	61.5	79,542	24.6	45,136	13.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	201	0.7	180	0.7	20	1.1	1	0.2
Moderate-income	3,299	11.4	3,019	11.3	212	11.6	68	16.9
Middle-income	17,951	61.8	16,506	61.6	1,197	65.4	248	61.7
Upper-income	7,594	26.1	7,109	26.5	400	21.9	85	21.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	29,045	100.0	26,814	100.0	1,829	100.0	402	100.0
Percentage of Total Businesses:			92.3		6.3		1.4	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	137	8.3	137	8.3	0	0.0	0	0.0
Middle-income	1,051	63.6	1,046	63.7	5	55.6	0	0.0
Upper-income	464	28.1	460	28.0	4	44.4	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,652	100.0	1,643	100.0	9	100.0	0	.0
Percentage of Total Farms:			99.5		.5		.0	

2015 FFIEC Census Data and 2015 D&B Information

Combined Demographics Report

Assessment Area(s): Lexington Fayette KY MSA #30460 2017

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	11	9.6	7,713	7.5	2,897	37.6	23,099	22.5	
Moderate-income	23	20.2	19,347	18.9	4,047	20.9	16,361	16	
Middle-income	46	40.4	40,638	39.7	3,240	8	19,588	19.1	
Upper-income	34	29.8	34,766	33.9	1,369	3.9	43,416	42.4	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	114	100.0	102,464	100.0	11,553	11.3	102,464	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	17,619	5,008	5.2	28.4	10,365	58.8	2,246	12.7	
Moderate-income	41,949	15,046	15.5	35.9	22,769	54.3	4,134	9.9	
Middle-income	72,455	40,263	41.5	55.6	25,675	35.4	6,517	9	
Upper-income	52,622	36,752	37.9	69.8	12,270	23.3	3,600	6.8	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	184,645	97,069	100.0	52.6	71,079	38.5	16,497	8.9	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	1,107	6.3	944	6	154	9.2	9	6.4	
Moderate-income	2,981	16.9	2,655	16.8	308	18.5	18	12.8	
Middle-income	7,743	43.9	6,877	43.4	814	48.8	52	36.9	
Upper-income	5,814	32.9	5,359	33.8	393	23.5	62	44	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	17,645	100.0	15,835	100.0	1,669	100.0	141	100.0	
Percentage of Total Businesses:				89.7		9.5		.8	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	14	2.2	14	2.3	0	0	0	0	
Moderate-income	34	5.4	34	5.6	0	0	0	0	
Middle-income	300	47.5	288	47.8	12	41.4	0	0	
Upper-income	283	44.8	266	44.2	17	58.6	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	631	100.0	602	100.0	29	100.0	0	.0	
Percentage of Total Farms:				95.4		4.6		.0	

2017 FFIEC Census Data and 2017 D&B Information

Combined Demographics Report

Assessment Area(s): Lexington Fayette KY MSA #30460 2016

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	10.5	6,987	7.0	2,158	30.9	22,396	22.4
Moderate-income	25	21.9	21,823	21.8	4,017	18.4	15,629	15.6
Middle-income	40	35.1	36,257	36.3	3,469	9.6	19,912	19.9
Upper-income	37	32.5	34,812	34.9	1,413	4.1	41,942	42.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	114	100.0	99,879	100.0	11,057	11.1	99,879	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	16,433	4,502	4.6	27.4	9,843	59.9	2,088	12.7
Moderate-income	45,935	18,109	18.6	39.4	23,108	50.3	4,718	10.3
Middle-income	62,220	38,153	39.2	61.3	19,725	31.7	4,342	7.0
Upper-income	52,887	36,642	37.6	69.3	12,613	23.8	3,632	6.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	177,475	97,406	100.0	54.9	65,289	36.8	14,780	8.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,413	7.1	1,225	6.8	180	10.7	8	5.2
Moderate-income	4,462	22.6	3,990	22.2	432	25.8	40	26.1
Middle-income	7,169	36.3	6,441	35.9	685	40.9	43	28.1
Upper-income	6,725	34.0	6,285	35.0	378	22.6	62	40.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	19,769	100.0	17,941	100.0	1,675	100.0	153	100.0
Percentage of Total Businesses:			90.8		8.5		.8	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	11	1.6	11	1.6	0	0.0	0	0.0
Moderate-income	51	7.3	51	7.6	0	0.0	0	0.0
Middle-income	339	48.2	320	47.6	19	61.3	0	0.0
Upper-income	302	43.0	290	43.2	12	38.7	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	703	100.0	672	100.0	31	100.0	0	.0
Percentage of Total Farms:			95.6		4.4		.0	

2016 FFIEC Census Data and 2016 D&B Information

Combined Demographics Report

Assessment Area(s): Lexington Fayette KY MSA #30460 2015

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	12	10.5	6,987	7.0	2,158	30.9	22,396	22.4	
Moderate-income	25	21.9	21,823	21.8	4,017	18.4	15,629	15.6	
Middle-income	40	35.1	36,257	36.3	3,469	9.6	19,912	19.9	
Upper-income	37	32.5	34,812	34.9	1,413	4.1	41,942	42.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	114	100.0	99,879	100.0	11,057	11.1	99,879	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	%	#	%	#	%	
Low-income	16,433	4,502	4.6	27.4	9,843	59.9	2,088	12.7	
Moderate-income	45,935	18,109	18.6	39.4	23,108	50.3	4,718	10.3	
Middle-income	62,220	38,153	39.2	61.3	19,725	31.7	4,342	7.0	
Upper-income	52,887	36,642	37.6	69.3	12,613	23.8	3,632	6.9	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	177,475	97,406	100.0	54.9	65,289	36.8	14,780	8.3	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	1,547	7.1	1,363	6.8	182	11.3	2	4.3	
Moderate-income	4,888	22.5	4,465	22.2	399	24.8	24	51.1	
Middle-income	7,932	36.5	7,253	36.1	665	41.3	14	29.8	
Upper-income	7,393	34.0	7,021	34.9	365	22.7	7	14.9	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	21,760	100.0	20,102	100.0	1,611	100.0	47	100.0	
Percentage of Total Businesses:			92.4		7.4		.2		
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	11	1.3	11	1.4	0	0.0	0	0.0	
Moderate-income	60	7.4	60	7.7	0	0.0	0	0.0	
Middle-income	395	48.5	376	48.1	19	57.6	0	0.0	
Upper-income	349	42.8	335	42.8	14	42.4	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	815	100.0	782	100.0	33	100.0	0	.0	
Percentage of Total Farms:			96.0		4.0		.0		

2015 FFIEC Census Data and 2015 D&B Information

Combined Demographics Report

Assessment Area(s): Knoxville TN MSA #28940 2017

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	0	0	0	0	0	0	8,921	29.2	
Moderate-income	14	48.3	13,359	43.7	2,739	20.5	5,843	19.1	
Middle-income	10	34.5	13,294	43.5	1,743	13.1	5,706	18.7	
Upper-income	4	13.8	3,892	12.7	245	6.3	10,075	33	
Unknown-income	1	3.4	0	0	0	0	0	0	
Total Assessment Area	29	100.0	30,545	100.0	4,727	15.5	30,545	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	25,407	12,783	39.8	50.3	8,072	31.8	4,552	17.9	
Middle-income	22,583	14,661	45.7	64.9	4,681	20.7	3,241	14.4	
Upper-income	7,033	4,642	14.5	66	1,768	25.1	623	8.9	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	55,023	32,086	100.0	58.3	14,521	26.4	8,416	15.3	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	1,315	38.2	1,158	38.1	127	35.7	30	61.2	
Middle-income	1,337	38.8	1,211	39.9	113	31.7	13	26.5	
Upper-income	656	19.1	589	19.4	62	17.4	5	10.2	
Unknown-income	134	3.9	79	2.6	54	15.2	1	2	
Total Assessment Area	3,442	100.0	3,037	100.0	356	100.0	49	100.0	
Percentage of Total Businesses:				88.2		10.3		1.4	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	17	32.1	17	32.7	0	0	0	0	
Middle-income	30	56.6	30	57.7	0	0	0	0	
Upper-income	5	9.4	5	9.6	0	0	0	0	
Unknown-income	1	1.9	0	0	1	100	0	0	
Total Assessment Area	53	100.0	52	100.0	1	100.0	0	.0	
Percentage of Total Farms:				98.1		1.9		.0	

2017 FFIEC Census Data and 2017 D&B Information

Combined Demographics Report

Assessment Area(s): Knoxville TN MSA #28940 2016

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	1	3.4	1,218	3.9	421	34.6	8,805	27.9	
Moderate-income	12	41.4	11,097	35.2	2,413	21.7	5,493	17.4	
Middle-income	11	37.9	15,214	48.2	1,700	11.2	6,770	21.5	
Upper-income	4	13.8	4,009	12.7	166	4.1	10,470	33.2	
Unknown-income	1	3.4	0	0.0	0	0.0	0	0.0	
Total Assessment Area	29	100.0	31,538	100.0	4,700	14.9	31,538	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	2,187	925	2.8	42.3	926	42.3	336	15.4	
Moderate-income	21,196	11,301	33.7	53.3	6,256	29.5	3,639	17.2	
Middle-income	24,373	16,699	49.7	68.5	4,537	18.6	3,137	12.9	
Upper-income	6,407	4,643	13.8	72.5	1,443	22.5	321	5.0	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	54,163	33,568	100.0	62.0	13,162	24.3	7,433	13.7	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	171	4.3	151	4.3	20	5.6	0	0.0	
Moderate-income	1,283	32.5	1,162	32.8	97	27.2	24	48.0	
Middle-income	1,609	40.8	1,471	41.6	119	33.3	19	38.0	
Upper-income	735	18.6	664	18.8	66	18.5	5	10.0	
Unknown-income	149	3.8	92	2.6	55	15.4	2	4.0	
Total Assessment Area	3,947	100.0	3,540	100.0	357	100.0	50	100.0	
Percentage of Total Businesses:			89.7		9.0		1.3		
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	27	41.5	27	42.2	0	0.0	0	0.0	
Middle-income	32	49.2	32	50.0	0	0.0	0	0.0	
Upper-income	5	7.7	5	7.8	0	0.0	0	0.0	
Unknown-income	1	1.5	0	0.0	1	100.0	0	0.0	
Total Assessment Area	65	100.0	64	100.0	1	100.0	0	.0	
Percentage of Total Farms:			98.5		1.5		.0		

2016 FFIEC Census Data and 2016 D&B Information

Combined Demographics Report

Assessment Area(s): Knoxville TN MSA #28940 2015

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	1	3.4	1,218	3.9	421	34.6	8,805	27.9	
Moderate-income	12	41.4	11,097	35.2	2,413	21.7	5,493	17.4	
Middle-income	11	37.9	15,214	48.2	1,700	11.2	6,770	21.5	
Upper-income	4	13.8	4,009	12.7	166	4.1	10,470	33.2	
Unknown-income	1	3.4	0	0.0	0	0.0	0	0.0	
Total Assessment Area	29	100.0	31,538	100.0	4,700	14.9	31,538	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	#	%	#	%	#	%
Low-income	2,187	925	2.8	42.3	926	42.3	336	15.4	
Moderate-income	21,196	11,301	33.7	53.3	6,256	29.5	3,639	17.2	
Middle-income	24,373	16,699	49.7	68.5	4,537	18.6	3,137	12.9	
Upper-income	6,407	4,643	13.8	72.5	1,443	22.5	321	5.0	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	54,163	33,568	100.0	62.0	13,162	24.3	7,433	13.7	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	198	4.3	180	4.3	18	5.4	0	0.0	
Moderate-income	1,448	31.7	1,332	31.9	92	27.5	24	53.3	
Middle-income	1,913	41.9	1,787	42.7	108	32.2	18	40.0	
Upper-income	840	18.4	773	18.5	64	19.1	3	6.7	
Unknown-income	163	3.6	110	2.6	53	15.8	0	0.0	
Total Assessment Area	4,562	100.0	4,182	100.0	335	100.0	45	100.0	
	Percentage of Total Businesses:			91.7		7.3		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	40	41.7	40	42.1	0	0.0	0	0.0	
Middle-income	47	49.0	47	49.5	0	0.0	0	0.0	
Upper-income	8	8.3	8	8.4	0	0.0	0	0.0	
Unknown-income	1	1.0	0	0.0	1	100.0	0	0.0	
Total Assessment Area	96	100.0	95	100.0	1	100.0	0	.0	
	Percentage of Total Farms:			99.0		1.0		.0	

2015 FFIEC Census Data and 2015 D&B Information

Combined Demographics Report

Assessment Area(s): Non Metropolitan West Virginia 2017

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	0	0	0	0	0	0	3,650	24.1	
Moderate-income	3	21.4	2,518	16.6	628	24.9	2,534	16.7	
Middle-income	10	71.4	10,819	71.4	1,682	15.5	3,010	19.9	
Upper-income	1	7.1	1,811	12	285	15.7	5,954	39.3	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	14	100.0	15,148	100.0	2,595	17.1	15,148	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	4,492	3,029	18.1	67.4	700	15.6	763	17	
Middle-income	17,747	11,640	69.4	65.6	3,369	19	2,738	15.4	
Upper-income	3,439	2,103	12.5	61.2	790	23	546	15.9	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	25,678	16,772	100.0	65.3	4,859	18.9	4,047	15.8	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	142	12.3	122	12.3	16	12.8	4	10	
Middle-income	641	55.5	545	55.1	71	56.8	25	62.5	
Upper-income	371	32.1	322	32.6	38	30.4	11	27.5	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	1,154	100.0	989	100.0	125	100.0	40	100.0	
Percentage of Total Businesses:				85.7		10.8		3.5	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	3	9.1	3	9.4	0	0	0	0	
Middle-income	21	63.6	20	62.5	1	100	0	0	
Upper-income	9	27.3	9	28.1	0	0	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	33	100.0	32	100.0	1	100.0	0	.0	
Percentage of Total Farms:				97.0		3.0		.0	

2017 FFIEC Census Data and 2017 D&B Information

Combined Demographics Report

Assessment Area(s): Non Metropolitan West Virginia 2016

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,437	22.7
Moderate-income	1	7.1	504	3.3	98	19.4	2,524	16.7
Middle-income	13	92.9	14,654	96.7	2,268	15.5	3,195	21.1
Upper-income	0	0.0	0	0.0	0	0.0	6,002	39.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	14	100.0	15,158	100.0	2,366	15.6	15,158	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	1,076	538	3.2	50.0	141	13.1	397	36.9
Middle-income	24,785	16,349	96.8	66.0	4,212	17.0	4,224	17.0
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	25,861	16,887	100.0	65.3	4,353	16.8	4,621	17.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	45	3.5	42	3.7	1	0.8	2	5.1
Middle-income	1,254	96.5	1,089	96.3	128	99.2	37	94.9
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,299	100.0	1,131	100.0	129	100.0	39	100.0
Percentage of Total Businesses:			87.1		9.9		3.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	38	100.0	37	100.0	1	100.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	38	100.0	37	100.0	1	100.0	0	.0
Percentage of Total Farms:			97.4		2.6		.0	

2016 FFIEC Census Data and 2016 D&B Information

Combined Demographics Report

Assessment Area(s): Non Metropolitan West Virginia 2015

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,437	22.7
Moderate-income	1	7.1	504	3.3	98	19.4	2,524	16.7
Middle-income	13	92.9	14,654	96.7	2,268	15.5	3,195	21.1
Upper-income	0	0.0	0	0.0	0	0.0	6,002	39.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	14	100.0	15,158	100.0	2,366	15.6	15,158	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	1,076	538	3.2	50.0	141	13.1	397	36.9
Middle-income	24,785	16,349	96.8	66.0	4,212	17.0	4,224	17.0
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	25,861	16,887	100.0	65.3	4,353	16.8	4,621	17.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	49	3.4	45	3.4	2	1.7	2	5.6
Middle-income	1,412	96.6	1,265	96.6	113	98.3	34	94.4
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,461	100.0	1,310	100.0	115	100.0	36	100.0
Percentage of Total Businesses:			89.7		7.9		2.5	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	45	100.0	43	100.0	2	100.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	45	100.0	43	100.0	2	100.0	0	.0
Percentage of Total Farms:			95.6		4.4		.0	

2015 FFIEC Census Data and 2015 D&B Information

APPENDIX F

FULL SCOPE PEER TABLES

Peer Group HMDA Loan Distribution Table

Exam ID: Community Trust Bank 2019

Selected Year: 2017

Huntington Ashland WV KY OH MSA #26580 2017

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	97	3.85%	9,051	2.85%	177	7.02%	10,813	3.4%
Moderate	278	11.03%	24,130	7.6%	481	19.08%	41,646	13.11%
<i>Low/Moderate Total</i>	<i>375</i>	<i>14.88%</i>	<i>33,181</i>	<i>10.45%</i>	<i>658</i>	<i>26.1%</i>	<i>52,459</i>	<i>16.52%</i>
Middle	1,506	59.74%	192,819	60.71%	546	21.66%	61,016	19.21%
Upper	640	25.39%	91,589	28.84%	935	37.09%	158,728	49.98%
Unknown	0	0.0%	0	0.0%	382	15.15%	45,386	14.29%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>2,521</i>	<i>100.0%</i>	<i>317,589</i>	<i>100.0%</i>	<i>2,521</i>	<i>100.0%</i>	<i>317,589</i>	<i>100.0%</i>
	Refinance							
Low	50	3.13%	5,355	2.79%	103	6.45%	5,888	3.07%
Moderate	155	9.71%	13,968	7.28%	221	13.85%	17,773	9.27%
<i>Low/Moderate Total</i>	<i>205</i>	<i>12.84%</i>	<i>19,323</i>	<i>10.08%</i>	<i>324</i>	<i>20.3%</i>	<i>23,661</i>	<i>12.34%</i>
Middle	1,012	63.41%	125,091	65.22%	350	21.93%	33,762	17.6%
Upper	377	23.62%	47,255	24.64%	713	44.67%	106,558	55.56%
Unknown	2	0.13%	117	0.06%	209	13.1%	27,805	14.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>1,596</i>	<i>100.0%</i>	<i>191,786</i>	<i>100.0%</i>	<i>1,596</i>	<i>100.0%</i>	<i>191,786</i>	<i>100.0%</i>
	Home Improvement							
Low	15	2.8%	487	1.49%	38	7.1%	830	2.54%
Moderate	57	10.65%	2,151	6.59%	115	21.5%	4,310	13.2%
<i>Low/Moderate Total</i>	<i>72</i>	<i>13.46%</i>	<i>2,638</i>	<i>8.08%</i>	<i>153</i>	<i>28.6%</i>	<i>5,140</i>	<i>15.75%</i>
Middle	344	64.3%	22,087	67.66%	111	20.75%	6,325	19.38%
Upper	116	21.68%	7,655	23.45%	252	47.1%	19,387	59.39%
Unknown	3	0.56%	264	0.81%	19	3.55%	1,792	5.49%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>535</i>	<i>100.0%</i>	<i>32,644</i>	<i>100.0%</i>	<i>535</i>	<i>100.0%</i>	<i>32,644</i>	<i>100.0%</i>
	Multi-Family							
Low	7	18.92%	6,040	19.35%	0	0.0%	0	0.0%
Moderate	8	21.62%	3,316	10.62%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>15</i>	<i>40.54%</i>	<i>9,356</i>	<i>29.97%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	15	40.54%	14,791	47.38%	0	0.0%	0	0.0%
Upper	5	13.51%	5,573	17.85%	0	0.0%	0	0.0%
Unknown	2	5.41%	1,495	4.79%	37	100.0%	31,215	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>37</i>	<i>100.0%</i>	<i>31,215</i>	<i>100.0%</i>	<i>37</i>	<i>100.0%</i>	<i>31,215</i>	<i>100.0%</i>
	HMDA Totals							
Low	169	3.6%	20,933	3.65%	318	6.78%	17,531	3.06%
Moderate	498	10.62%	43,565	7.6%	817	17.42%	63,729	11.12%
<i>Low/Moderate Total</i>	<i>667</i>	<i>14.22%</i>	<i>64,498</i>	<i>11.25%</i>	<i>1,135</i>	<i>24.21%</i>	<i>81,260</i>	<i>14.18%</i>
Middle	2,877	61.36%	354,788	61.89%	1,007	21.48%	101,103	17.64%
Upper	1,138	24.27%	152,072	26.53%	1,900	40.52%	284,673	49.66%
Unknown	7	0.15%	1,876	0.33%	647	13.8%	106,198	18.53%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>4,689</i>	<i>100.0%</i>	<i>573,234</i>	<i>100.0%</i>	<i>4,689</i>	<i>100.0%</i>	<i>573,234</i>	<i>100.0%</i>

Peer Group HMDA Loan Distribution Table

Exam ID: Community Trust Bank 2019

Selected Year: 2016

Huntington Ashland WV KY OH MSA #26580 2016

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	23	0.9%	1,647	0.5%	190	7.5%	12,243	3.9%
Moderate	257	10.2%	23,468	7.6%	483	19.1%	42,419	13.7%
<i>Low/Moderate Total</i>	<i>280</i>	<i>11.1%</i>	<i>25,115</i>	<i>8.1%</i>	<i>673</i>	<i>26.7%</i>	<i>54,662</i>	<i>17.6%</i>
Middle	1,570	62.2%	191,528	61.7%	595	23.6%	66,295	21.3%
Upper	673	26.7%	93,917	30.2%	808	32.0%	143,521	46.2%
Unknown	0	0.0%	0	0.0%	447	17.7%	46,082	14.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,523	100.0%	310,560	100.0%	2,523	100.0%	310,560	100.0%
	Refinance							
Low	17	1.0%	1,103	0.5%	122	7.0%	7,596	3.6%
Moderate	174	9.9%	16,119	7.7%	262	15.0%	19,339	9.2%
<i>Low/Moderate Total</i>	<i>191</i>	<i>10.9%</i>	<i>17,222</i>	<i>8.2%</i>	<i>384</i>	<i>21.9%</i>	<i>26,935</i>	<i>12.8%</i>
Middle	1,080	61.6%	128,646	61.3%	363	20.7%	35,709	17.0%
Upper	481	27.5%	63,877	30.5%	720	41.1%	106,933	51.0%
Unknown	0	0.0%	0	0.0%	285	16.3%	40,168	19.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,732	100.0%	209,745	100.0%	1,732	100.0%	209,745	100.0%
	Home Improvement							
Low	14	2.3%	567	1.5%	71	11.8%	1,653	4.5%
Moderate	82	13.7%	3,374	9.2%	117	19.5%	5,120	14.0%
<i>Low/Moderate Total</i>	<i>96</i>	<i>16.0%</i>	<i>3,941</i>	<i>10.8%</i>	<i>188</i>	<i>31.3%</i>	<i>6,773</i>	<i>18.5%</i>
Middle	339	56.5%	21,004	57.3%	148	24.7%	6,912	18.9%
Upper	165	27.5%	11,696	31.9%	240	40.0%	21,268	58.0%
Unknown	0	0.0%	0	0.0%	24	4.0%	1,688	4.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	600	100.0%	36,641	100.0%	600	100.0%	36,641	100.0%
	Multi-Family							
Low	5	12.5%	3,720	10.4%	0	0.0%	0	0.0%
Moderate	15	37.5%	18,217	50.8%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>20</i>	<i>50.0%</i>	<i>21,937</i>	<i>61.1%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	16	40.0%	10,061	28.0%	0	0.0%	0	0.0%
Upper	4	10.0%	3,894	10.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	40	100.0%	35,892	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	40	100.0%	35,892	100.0%	40	100.0%	35,892	100.0%
	HMDA Totals							
Low	59	1.2%	7,037	1.2%	383	7.8%	21,492	3.6%
Moderate	528	10.7%	61,178	10.3%	862	17.5%	66,878	11.3%
<i>Low/Moderate Total</i>	<i>587</i>	<i>11.9%</i>	<i>68,215</i>	<i>11.5%</i>	<i>1,245</i>	<i>25.3%</i>	<i>88,370</i>	<i>14.9%</i>
Middle	3,005	61.1%	351,239	59.2%	1,106	22.5%	108,916	18.4%
Upper	1,323	26.9%	173,384	29.2%	1,768	36.0%	271,722	45.8%
Unknown	0	0.0%	0	0.0%	796	16.2%	123,830	20.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4,915	100.0%	592,838	100.0%	4,915	100.0%	592,838	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Community Trust Bank 2019

Selected Year: 2015

Huntington Ashland WV KY OH MSA #26580 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	34	1.4 %	2,847	1.0 %	178	7.3 %	10,415	3.5 %
Moderate	274	11.3 %	23,983	8.0 %	457	18.8 %	37,419	12.5 %
<i>Low/Moderate Total</i>	<i>308</i>	<i>12.7 %</i>	<i>26,830</i>	<i>9.0 %</i>	<i>635</i>	<i>26.2 %</i>	<i>47,834</i>	<i>16.0 %</i>
Middle	1,433	59.1 %	173,909	58.1 %	577	23.8 %	66,105	22.1 %
Upper	685	28.2 %	98,554	32.9 %	855	35.2 %	142,832	47.7 %
Unknown	0	0.0 %	0	0.0 %	359	14.8 %	42,524	14.2 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	2,426	100.0 %	299,293	100.0 %	2,426	100.0 %	299,293	100.0 %
	Refinance							
Low	30	1.7 %	3,020	1.5 %	132	7.5 %	7,604	3.7 %
Moderate	167	9.4 %	14,925	7.3 %	255	14.4 %	19,468	9.5 %
<i>Low/Moderate Total</i>	<i>197</i>	<i>11.1 %</i>	<i>17,945</i>	<i>8.7 %</i>	<i>387</i>	<i>21.9 %</i>	<i>27,072</i>	<i>13.2 %</i>
Middle	1,095	61.9 %	127,401	61.9 %	358	20.2 %	36,034	17.5 %
Upper	475	26.9 %	60,102	29.2 %	736	41.6 %	105,583	51.3 %
Unknown	1	0.1 %	323	0.2 %	287	16.2 %	37,082	18.0 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	1,768	100.0 %	205,771	100.0 %	1,768	100.0 %	205,771	100.0 %
	Home Improvement							
Low	8	1.4 %	280	0.9 %	42	7.3 %	967	3.0 %
Moderate	74	12.8 %	4,970	15.3 %	123	21.4 %	3,784	11.7 %
<i>Low/Moderate Total</i>	<i>82</i>	<i>14.2 %</i>	<i>5,250</i>	<i>16.2 %</i>	<i>165</i>	<i>28.6 %</i>	<i>4,751</i>	<i>14.7 %</i>
Middle	369	64.1 %	19,977	61.7 %	116	20.1 %	4,935	15.2 %
Upper	124	21.5 %	7,134	22.0 %	280	48.6 %	20,007	61.8 %
Unknown	1	0.2 %	25	0.1 %	15	2.6 %	2,693	8.3 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	576	100.0 %	32,386	100.0 %	576	100.0 %	32,386	100.0 %
	Multi-Family							
Low	6	16.2 %	2,502	5.0 %	0	0.0 %	0	0.0 %
Moderate	9	24.3 %	7,385	14.7 %	0	0.0 %	0	0.0 %
<i>Low/Moderate Total</i>	<i>15</i>	<i>40.5 %</i>	<i>9,887</i>	<i>19.6 %</i>	<i>0</i>	<i>0.0 %</i>	<i>0</i>	<i>0.0 %</i>
Middle	16	43.2 %	27,240	54.1 %	0	0.0 %	0	0.0 %
Upper	6	16.2 %	13,268	26.3 %	0	0.0 %	0	0.0 %
Unknown	0	0.0 %	0	0.0 %	37	100.0 %	50,395	100.0 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	37	100.0 %	50,395	100.0 %	37	100.0 %	50,395	100.0 %
	HMDA Totals							
Low	78	1.6 %	8,649	1.5 %	352	7.3 %	18,986	3.2 %
Moderate	524	10.9 %	51,263	8.7 %	835	17.4 %	60,671	10.3 %
<i>Low/Moderate Total</i>	<i>602</i>	<i>12.5 %</i>	<i>59,912</i>	<i>10.2 %</i>	<i>1,187</i>	<i>24.7 %</i>	<i>79,657</i>	<i>13.6 %</i>
Middle	2,913	60.6 %	348,527	59.3 %	1,051	21.9 %	107,072	18.2 %
Upper	1,290	26.8 %	179,058	30.5 %	1,871	38.9 %	268,422	45.7 %
Unknown	2	0.0 %	348	0.1 %	698	14.5 %	132,694	22.6 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	4,807	100.0 %	587,845	100.0 %	4,807	100.0 %	587,845	100.0 %

Peer Group HMDA Loan Distribution Table

Exam ID: Community Trust Bank 2019

Selected Year: 2017

Non Metropolitan Kentucky 2017

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	30	0.39%	2,340	0.23%	265	3.43%	15,747	1.54%
Moderate	676	8.74%	71,467	6.98%	1,113	14.39%	98,248	9.59%
<i>Low/Moderate Total</i>	<i>706</i>	<i>9.12%</i>	<i>73,807</i>	<i>7.2%</i>	<i>1,378</i>	<i>17.81%</i>	<i>113,995</i>	<i>11.13%</i>
Middle	4,560	58.94%	557,470	54.41%	1,741	22.5%	201,951	19.71%
Upper	2,470	31.92%	393,308	38.39%	2,994	38.7%	499,605	48.76%
Unknown	1	0.01%	27	0.0%	1,624	20.99%	209,061	20.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7,737	100.0%	1,024,612	100.0%	7,737	100.0%	1,024,612	100.0%
	Refinance							
Low	15	0.44%	2,110	0.44%	151	4.39%	9,395	1.96%
Moderate	291	8.47%	40,853	8.54%	392	11.41%	34,034	7.11%
<i>Low/Moderate Total</i>	<i>306</i>	<i>8.9%</i>	<i>42,963</i>	<i>8.98%</i>	<i>543</i>	<i>15.8%</i>	<i>43,429</i>	<i>9.08%</i>
Middle	1,992	57.96%	253,802	53.05%	605	17.6%	64,831	13.55%
Upper	1,136	33.05%	181,390	37.91%	1,639	47.69%	265,625	55.52%
Unknown	3	0.09%	300	0.06%	650	18.91%	104,570	21.86%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3,437	100.0%	478,455	100.0%	3,437	100.0%	478,455	100.0%
	Home Improvement							
Low	11	1.04%	478	0.91%	90	8.51%	1,901	3.61%
Moderate	140	13.25%	5,443	10.35%	181	17.12%	4,642	8.83%
<i>Low/Moderate Total</i>	<i>151</i>	<i>14.29%</i>	<i>5,921</i>	<i>11.26%</i>	<i>271</i>	<i>25.64%</i>	<i>6,543</i>	<i>12.44%</i>
Middle	668	63.2%	29,022	55.18%	243	22.99%	8,702	16.54%
Upper	236	22.33%	17,594	33.45%	495	46.83%	32,950	62.65%
Unknown	2	0.19%	60	0.11%	48	4.54%	4,402	8.37%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,057	100.0%	52,597	100.0%	1,057	100.0%	52,597	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	9	17.31%	9,108	22.84%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>9</i>	<i>17.31%</i>	<i>9,108</i>	<i>22.84%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	30	57.69%	22,140	55.51%	0	0.0%	0	0.0%
Upper	13	25.0%	8,634	21.65%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	52	100.0%	39,882	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	52	100.0%	39,882	100.0%	52	100.0%	39,882	100.0%
	HMDA Totals							
Low	56	0.46%	4,928	0.31%	506	4.12%	27,043	1.69%
Moderate	1,116	9.09%	126,871	7.95%	1,686	13.73%	136,924	8.58%
<i>Low/Moderate Total</i>	<i>1,172</i>	<i>9.54%</i>	<i>131,799</i>	<i>8.26%</i>	<i>2,192</i>	<i>17.85%</i>	<i>163,967</i>	<i>10.28%</i>
Middle	7,250	59.02%	862,434	54.05%	2,589	21.08%	275,484	17.27%
Upper	3,855	31.38%	600,926	37.66%	5,128	41.75%	798,180	50.03%
Unknown	6	0.05%	387	0.02%	2,374	19.33%	357,915	22.43%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12,283	100.0%	1,595,546	100.0%	12,283	100.0%	1,595,546	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Community Trust Bank 2019
Non Metropolitan Kentucky 2016

Selected Year: 2016

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	11	0.1 %	861	0.1 %	306	4.0 %	18,073	1.8 %
Moderate	774	10.0 %	82,140	8.1 %	1,161	15.0 %	99,276	9.7 %
<i>Low/Moderate Total</i>	<i>785</i>	<i>10.1 %</i>	<i>83,001</i>	<i>8.1 %</i>	<i>1,467</i>	<i>19.0 %</i>	<i>117,349</i>	<i>11.5 %</i>
Middle	4,031	52.1 %	489,680	48.0 %	1,626	21.0 %	181,339	17.8 %
Upper	2,911	37.6 %	445,904	43.7 %	3,090	39.9 %	521,961	51.2 %
Unknown	14	0.2 %	1,040	0.1 %	1,558	20.1 %	198,976	19.5 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	7,741	100.0 %	1,019,625	100.0 %	7,741	100.0 %	1,019,625	100.0 %
	Refinance							
Low	5	0.1 %	557	0.1 %	154	3.6 %	10,633	1.8 %
Moderate	425	10.0 %	48,138	8.1 %	455	10.7 %	37,602	6.3 %
<i>Low/Moderate Total</i>	<i>430</i>	<i>10.1 %</i>	<i>48,695</i>	<i>8.2 %</i>	<i>609</i>	<i>14.3 %</i>	<i>48,235</i>	<i>8.1 %</i>
Middle	2,152	50.7 %	283,202	47.7 %	682	16.1 %	71,419	12.0 %
Upper	1,658	39.0 %	260,182	43.9 %	1,978	46.6 %	316,732	53.4 %
Unknown	7	0.2 %	1,060	0.2 %	978	23.0 %	156,753	26.4 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	4,247	100.0 %	593,139	100.0 %	4,247	100.0 %	593,139	100.0 %
	Home Improvement							
Low	3	0.3 %	81	0.1 %	104	9.5 %	1,425	2.6 %
Moderate	213	19.4 %	8,948	16.3 %	215	19.6 %	5,424	9.9 %
<i>Low/Moderate Total</i>	<i>216</i>	<i>19.7 %</i>	<i>9,029</i>	<i>16.5 %</i>	<i>319</i>	<i>29.1 %</i>	<i>6,849</i>	<i>12.5 %</i>
Middle	650	59.2 %	29,528	53.9 %	235	21.4 %	10,246	18.7 %
Upper	232	21.1 %	16,232	29.6 %	499	45.4 %	34,685	63.3 %
Unknown	0	0.0 %	0	0.0 %	45	4.1 %	3,009	5.5 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	1,098	100.0 %	54,789	100.0 %	1,098	100.0 %	54,789	100.0 %
	Multi-Family							
Low	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Moderate	2	4.8 %	1,248	3.3 %	0	0.0 %	0	0.0 %
<i>Low/Moderate Total</i>	<i>2</i>	<i>4.8 %</i>	<i>1,248</i>	<i>3.3 %</i>	<i>0</i>	<i>0.0 %</i>	<i>0</i>	<i>0.0 %</i>
Middle	18	42.9 %	11,668	31.0 %	0	0.0 %	0	0.0 %
Upper	22	52.4 %	24,757	65.7 %	0	0.0 %	0	0.0 %
Unknown	0	0.0 %	0	0.0 %	42	100.0 %	37,673	100.0 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	42	100.0 %	37,673	100.0 %	42	100.0 %	37,673	100.0 %
	HMDA Totals							
Low	19	0.1 %	1,499	0.1 %	564	4.3 %	30,131	1.8 %
Moderate	1,414	10.8 %	140,474	8.2 %	1,831	13.9 %	142,302	8.3 %
<i>Low/Moderate Total</i>	<i>1,433</i>	<i>10.9 %</i>	<i>141,973</i>	<i>8.3 %</i>	<i>2,395</i>	<i>18.2 %</i>	<i>172,433</i>	<i>10.1 %</i>
Middle	6,831	52.2 %	814,078	47.7 %	2,543	19.4 %	263,004	15.4 %
Upper	4,823	36.7 %	747,075	43.8 %	5,567	42.4 %	873,378	51.2 %
Unknown	21	0.2 %	2,100	0.1 %	2,623	20.0 %	396,411	23.2 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	13,128	100.0 %	1,705,226	100.0 %	13,128	100.0 %	1,705,226	100.0 %

Peer Group HMDA Loan Distribution Table

Exam ID: Community Trust Bank 2019
Non Metropolitan Kentucky 2015

Selected Year: 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	15	0.2 %	1,214	0.1 %	283	4.3 %	16,442	2.0 %
Moderate	704	10.6 %	70,729	8.6 %	1,079	16.3 %	86,451	10.5 %
<i>Low/Moderate Total</i>	<i>719</i>	<i>10.8 %</i>	<i>71,943</i>	<i>8.7 %</i>	<i>1,362</i>	<i>20.5 %</i>	<i>102,893</i>	<i>12.4 %</i>
Middle	3,624	54.6 %	410,777	49.7 %	1,450	21.9 %	155,936	18.9 %
Upper	2,285	34.4 %	343,707	41.6 %	2,436	36.7 %	395,884	47.9 %
Unknown	7	0.1 %	696	0.1 %	1,387	20.9 %	172,410	20.8 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	6,635	100.0 %	827,123	100.0 %	6,635	100.0 %	827,123	100.0 %
	Refinance							
Low	8	0.2 %	697	0.1 %	161	4.1 %	10,050	2.0 %
Moderate	392	9.9 %	41,171	8.1 %	450	11.3 %	35,751	7.0 %
<i>Low/Moderate Total</i>	<i>400</i>	<i>10.1 %</i>	<i>41,868</i>	<i>8.2 %</i>	<i>611</i>	<i>15.4 %</i>	<i>45,801</i>	<i>9.0 %</i>
Middle	2,014	50.8 %	239,413	47.1 %	737	18.6 %	75,208	14.8 %
Upper	1,546	39.0 %	226,400	44.6 %	1,803	45.4 %	271,851	53.5 %
Unknown	7	0.2 %	502	0.1 %	816	20.6 %	115,323	22.7 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	3,967	100.0 %	508,183	100.0 %	3,967	100.0 %	508,183	100.0 %
	Home Improvement							
Low	2	0.2 %	73	0.2 %	98	9.1 %	1,104	2.4 %
Moderate	186	17.3 %	6,129	13.4 %	209	19.4 %	4,714	10.3 %
<i>Low/Moderate Total</i>	<i>188</i>	<i>17.5 %</i>	<i>6,202</i>	<i>13.5 %</i>	<i>307</i>	<i>28.6 %</i>	<i>5,818</i>	<i>12.7 %</i>
Middle	662	61.6 %	27,211	59.3 %	248	23.1 %	8,479	18.5 %
Upper	224	20.8 %	12,448	27.1 %	478	44.5 %	29,242	63.7 %
Unknown	1	0.1 %	20	0.0 %	42	3.9 %	2,342	5.1 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	1,075	100.0 %	45,881	100.0 %	1,075	100.0 %	45,881	100.0 %
	Multi-Family							
Low	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Moderate	4	7.7 %	2,610	6.6 %	0	0.0 %	0	0.0 %
<i>Low/Moderate Total</i>	<i>4</i>	<i>7.7 %</i>	<i>2,610</i>	<i>6.6 %</i>	<i>0</i>	<i>0.0 %</i>	<i>0</i>	<i>0.0 %</i>
Middle	24	46.2 %	22,813	57.9 %	0	0.0 %	0	0.0 %
Upper	24	46.2 %	14,001	35.5 %	0	0.0 %	0	0.0 %
Unknown	0	0.0 %	0	0.0 %	52	100.0 %	39,424	100.0 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	52	100.0 %	39,424	100.0 %	52	100.0 %	39,424	100.0 %
	HMDA Totals							
Low	25	0.2 %	1,984	0.1 %	542	4.6 %	27,596	1.9 %
Moderate	1,286	11.0 %	120,639	8.5 %	1,738	14.8 %	126,916	8.9 %
<i>Low/Moderate Total</i>	<i>1,311</i>	<i>11.2 %</i>	<i>122,623</i>	<i>8.6 %</i>	<i>2,280</i>	<i>19.4 %</i>	<i>154,512</i>	<i>10.9 %</i>
Middle	6,324	53.9 %	700,214	49.3 %	2,435	20.8 %	239,623	16.9 %
Upper	4,079	34.8 %	596,556	42.0 %	4,717	40.2 %	696,977	49.1 %
Unknown	15	0.1 %	1,218	0.1 %	2,297	19.6 %	329,499	23.2 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	11,729	100.0 %	1,420,611	100.0 %	11,729	100.0 %	1,420,611	100.0 %

Peer Group HMDA Loan Distribution Table

Exam ID: Community Trust Bank 2019

Selected Year: 2017

Lexington Fayette KY MSA #30460 2017

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	333	3.41%	42,029	2.3%	583	5.97%	60,675	3.32%
Moderate	1,360	13.92%	172,628	9.46%	1,920	19.65%	262,604	14.38%
<i>Low/Moderate Total</i>	<i>1,693</i>	<i>17.33%</i>	<i>214,657</i>	<i>11.76%</i>	<i>2,503</i>	<i>25.62%</i>	<i>323,279</i>	<i>17.71%</i>
Middle	4,166	42.64%	704,343	38.58%	1,886	19.3%	321,595	17.62%
Upper	3,912	40.04%	906,542	49.66%	3,470	35.51%	838,344	45.92%
Unknown	0	0.0%	0	0.0%	1,912	19.57%	342,324	18.75%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9,771	100.0%	1,825,542	100.0%	9,771	100.0%	1,825,542	100.0%
	Refinance							
Low	208	5.04%	32,808	4.27%	274	6.64%	24,510	3.19%
Moderate	568	13.77%	78,267	10.19%	596	14.45%	71,224	9.27%
<i>Low/Moderate Total</i>	<i>776</i>	<i>18.81%</i>	<i>111,075</i>	<i>14.46%</i>	<i>870</i>	<i>21.09%</i>	<i>95,734</i>	<i>12.46%</i>
Middle	1,746	42.33%	293,896	38.27%	798	19.35%	115,656	15.06%
Upper	1,603	38.86%	363,063	47.27%	1,549	37.55%	365,883	47.64%
Unknown	0	0.0%	0	0.0%	908	22.01%	190,761	24.84%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4,125	100.0%	768,034	100.0%	4,125	100.0%	768,034	100.0%
	Home Improvement							
Low	30	4.65%	2,178	3.67%	57	8.84%	2,128	3.59%
Moderate	108	16.74%	7,043	11.87%	113	17.52%	6,442	10.85%
<i>Low/Moderate Total</i>	<i>138</i>	<i>21.4%</i>	<i>9,221</i>	<i>15.54%</i>	<i>170</i>	<i>26.36%</i>	<i>8,570</i>	<i>14.44%</i>
Middle	280	43.41%	22,086	37.21%	131	20.31%	10,739	18.09%
Upper	227	35.19%	28,044	47.25%	280	43.41%	33,535	56.5%
Unknown	0	0.0%	0	0.0%	64	9.92%	6,507	10.96%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	645	100.0%	59,351	100.0%	645	100.0%	59,351	100.0%
	Multi-Family							
Low	8	9.41%	25,211	7.95%	0	0.0%	0	0.0%
Moderate	36	42.35%	135,147	42.59%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>44</i>	<i>51.76%</i>	<i>160,358</i>	<i>50.54%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	31	36.47%	76,755	24.19%	0	0.0%	0	0.0%
Upper	10	11.76%	80,181	25.27%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	85	100.0%	317,294	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	85	100.0%	317,294	100.0%	85	100.0%	317,294	100.0%
	HMDA Totals							
Low	579	3.96%	102,226	3.44%	914	6.25%	87,313	2.94%
Moderate	2,072	14.17%	393,085	13.23%	2,629	17.97%	340,270	11.46%
<i>Low/Moderate Total</i>	<i>2,651</i>	<i>18.13%</i>	<i>495,311</i>	<i>16.68%</i>	<i>3,543</i>	<i>24.22%</i>	<i>427,583</i>	<i>14.4%</i>
Middle	6,223	42.55%	1,097,080	36.94%	2,815	19.25%	447,990	15.08%
Upper	5,752	39.33%	1,377,830	46.39%	5,299	36.23%	1,237,762	41.67%
Unknown	0	0.0%	0	0.0%	2,969	20.3%	856,886	28.85%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14,626	100.0%	2,970,221	100.0%	14,626	100.0%	2,970,221	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Community Trust Bank 2019

Selected Year: 2016

Lexington Fayette KY MSA #30460 2016

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	351	3.6%	42,145	2.5%	733	7.6%	72,798	4.3%
Moderate	1,465	15.2%	168,481	9.9%	1,854	19.2%	244,680	14.4%
<i>Low/Moderate Total</i>	<i>1,816</i>	<i>18.8%</i>	<i>210,626</i>	<i>12.4%</i>	<i>2,587</i>	<i>26.8%</i>	<i>317,478</i>	<i>18.6%</i>
Middle	3,683	38.1%	590,846	34.7%	2,105	21.8%	343,633	20.2%
Upper	4,158	43.1%	903,353	53.0%	3,247	33.6%	756,538	44.4%
Unknown	0	0.0%	0	0.0%	1,718	17.8%	287,176	16.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9,637	100.0%	1,704,825	100.0%	9,637	100.0%	1,704,825	100.0%
	Refinance							
Low	242	4.2%	30,471	2.9%	351	6.1%	31,229	2.9%
Moderate	730	12.7%	91,416	8.6%	738	12.8%	87,215	8.2%
<i>Low/Moderate Total</i>	<i>972</i>	<i>16.9%</i>	<i>121,887</i>	<i>11.5%</i>	<i>1,089</i>	<i>18.9%</i>	<i>118,444</i>	<i>11.2%</i>
Middle	2,061	35.8%	345,679	32.6%	1,084	18.8%	156,337	14.8%
Upper	2,728	47.3%	591,736	55.9%	2,243	38.9%	527,686	49.8%
Unknown	1	0.0%	185	0.0%	1,346	23.4%	257,000	24.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5,762	100.0%	1,039,487	100.0%	5,762	100.0%	1,039,487	100.0%
	Home Improvement							
Low	32	4.8%	3,195	4.3%	58	8.8%	2,906	3.9%
Moderate	107	16.2%	6,883	9.2%	108	16.3%	6,023	8.1%
<i>Low/Moderate Total</i>	<i>139</i>	<i>21.0%</i>	<i>10,078</i>	<i>13.5%</i>	<i>166</i>	<i>25.1%</i>	<i>8,929</i>	<i>12.0%</i>
Middle	236	35.7%	22,227	29.9%	137	20.7%	11,174	15.0%
Upper	286	43.3%	42,120	56.6%	303	45.8%	45,373	61.0%
Unknown	0	0.0%	0	0.0%	55	8.3%	8,949	12.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	661	100.0%	74,425	100.0%	661	100.0%	74,425	100.0%
	Multi-Family							
Low	11	12.6%	6,824	4.6%	0	0.0%	0	0.0%
Moderate	33	37.9%	37,524	25.1%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>44</i>	<i>50.6%</i>	<i>44,348</i>	<i>29.6%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	22	25.3%	74,708	49.9%	0	0.0%	0	0.0%
Upper	21	24.1%	30,649	20.5%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	87	100.0%	149,705	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	87	100.0%	149,705	100.0%	87	100.0%	149,705	100.0%
	HMDA Totals							
Low	636	3.9%	82,635	2.8%	1,142	7.1%	106,933	3.6%
Moderate	2,335	14.4%	304,304	10.2%	2,700	16.7%	337,918	11.3%
<i>Low/Moderate Total</i>	<i>2,971</i>	<i>18.4%</i>	<i>386,939</i>	<i>12.9%</i>	<i>3,842</i>	<i>23.8%</i>	<i>444,851</i>	<i>14.9%</i>
Middle	6,002	37.1%	1,033,460	34.6%	3,326	20.6%	511,164	17.1%
Upper	7,193	44.5%	1,567,858	52.5%	5,793	35.8%	1,329,597	44.5%
Unknown	1	0.0%	185	0.0%	3,206	19.8%	702,830	23.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16,167	100.0%	2,988,442	100.0%	16,167	100.0%	2,988,442	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Community Trust Bank 2019

Selected Year: 2015

Lexington Fayette KY MSA #30460 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	329	3.8 %	46,559	3.1 %	716	8.3 %	71,678	4.7 %
Moderate	1,197	13.8 %	142,802	9.4 %	1,745	20.1 %	225,049	14.8 %
<i>Low/Moderate Total</i>	<i>1,526</i>	<i>17.6 %</i>	<i>189,361</i>	<i>12.4 %</i>	<i>2,461</i>	<i>28.4 %</i>	<i>296,727</i>	<i>19.5 %</i>
Middle	3,299	38.0 %	517,671	34.0 %	1,759	20.3 %	279,594	18.4 %
Upper	3,848	44.4 %	814,583	53.5 %	2,862	33.0 %	666,198	43.8 %
Unknown	0	0.0 %	0	0.0 %	1,591	18.3 %	279,096	18.3 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	8,673	100.0 %	1,521,615	100.0 %	8,673	100.0 %	1,521,615	100.0 %
	Refinance							
Low	192	3.8 %	23,892	2.7 %	416	8.1 %	37,485	4.3 %
Moderate	767	15.0 %	92,035	10.5 %	785	15.3 %	90,168	10.3 %
<i>Low/Moderate Total</i>	<i>959</i>	<i>18.7 %</i>	<i>115,927</i>	<i>13.3 %</i>	<i>1,201</i>	<i>23.5 %</i>	<i>127,653</i>	<i>14.6 %</i>
Middle	1,921	37.5 %	293,948	33.7 %	984	19.2 %	139,421	16.0 %
Upper	2,236	43.7 %	463,622	53.1 %	1,803	35.2 %	393,554	45.1 %
Unknown	0	0.0 %	0	0.0 %	1,128	22.0 %	212,869	24.4 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	5,116	100.0 %	873,497	100.0 %	5,116	100.0 %	873,497	100.0 %
	Home Improvement							
Low	29	5.2 %	1,256	2.6 %	70	12.6 %	2,811	5.8 %
Moderate	100	18.0 %	4,811	10.0 %	104	18.7 %	4,554	9.4 %
<i>Low/Moderate Total</i>	<i>129</i>	<i>23.2 %</i>	<i>6,067</i>	<i>12.6 %</i>	<i>174</i>	<i>31.3 %</i>	<i>7,365</i>	<i>15.3 %</i>
Middle	209	37.6 %	15,972	33.1 %	117	21.0 %	6,311	13.1 %
Upper	218	39.2 %	26,195	54.3 %	208	37.4 %	26,810	55.6 %
Unknown	0	0.0 %	0	0.0 %	57	10.3 %	7,748	16.1 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	556	100.0 %	48,234	100.0 %	556	100.0 %	48,234	100.0 %
	Multi-Family							
Low	9	11.3 %	47,340	26.7 %	0	0.0 %	0	0.0 %
Moderate	37	46.3 %	49,046	27.7 %	0	0.0 %	0	0.0 %
<i>Low/Moderate Total</i>	<i>46</i>	<i>57.5 %</i>	<i>96,386</i>	<i>54.3 %</i>	<i>0</i>	<i>0.0 %</i>	<i>0</i>	<i>0.0 %</i>
Middle	23	28.8 %	41,537	23.4 %	0	0.0 %	0	0.0 %
Upper	11	13.8 %	39,454	22.2 %	0	0.0 %	0	0.0 %
Unknown	0	0.0 %	0	0.0 %	80	100.0 %	177,377	100.0 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	80	100.0 %	177,377	100.0 %	80	100.0 %	177,377	100.0 %
	HMDA Totals							
Low	559	3.9 %	119,047	4.5 %	1,202	8.3 %	111,974	4.3 %
Moderate	2,101	14.6 %	288,694	11.0 %	2,634	18.3 %	319,771	12.2 %
<i>Low/Moderate Total</i>	<i>2,660</i>	<i>18.4 %</i>	<i>407,741</i>	<i>15.6 %</i>	<i>3,836</i>	<i>26.6 %</i>	<i>431,745</i>	<i>16.5 %</i>
Middle	5,452	37.8 %	869,128	33.2 %	2,860	19.8 %	425,326	16.2 %
Upper	6,313	43.8 %	1,343,854	51.3 %	4,873	33.8 %	1,086,562	41.5 %
Unknown	0	0.0 %	0	0.0 %	2,856	19.8 %	677,090	25.8 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	14,425	100.0 %	2,620,723	100.0 %	14,425	100.0 %	2,620,723	100.0 %

Peer Group HMDA Loan Distribution Table

Exam ID: Community Trust Bank 2019

Selected Year: 2017

Knoxville TN MSA #28940 2017

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	207	10.21%	17,056	5.57%
Moderate	771	38.04%	110,436	36.09%	430	21.21%	47,425	15.5%
<i>Low/Moderate Total</i>	<i>771</i>	<i>38.04%</i>	<i>110,436</i>	<i>36.09%</i>	<i>637</i>	<i>31.43%</i>	<i>64,481</i>	<i>21.07%</i>
Middle	935	46.13%	136,227	44.52%	336	16.58%	46,119	15.07%
Upper	320	15.79%	59,121	19.32%	588	29.01%	128,916	42.13%
Unknown	1	0.05%	176	0.06%	466	22.99%	66,444	21.72%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,027	100.0%	305,960	100.0%	2,027	100.0%	305,960	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	110	11.03%	7,214	5.47%
Moderate	370	37.11%	45,054	34.18%	156	15.65%	13,481	10.23%
<i>Low/Moderate Total</i>	<i>370</i>	<i>37.11%</i>	<i>45,054</i>	<i>34.18%</i>	<i>266</i>	<i>26.68%</i>	<i>20,695</i>	<i>15.7%</i>
Middle	481	48.24%	62,280	47.25%	199	19.96%	23,529	17.85%
Upper	146	14.64%	24,487	18.58%	342	34.3%	57,575	43.68%
Unknown	0	0.0%	0	0.0%	190	19.06%	30,022	22.77%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	997	100.0%	131,821	100.0%	997	100.0%	131,821	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	51	19.62%	866	5.7%
Moderate	115	44.23%	5,183	34.12%	65	25.0%	2,568	16.91%
<i>Low/Moderate Total</i>	<i>115</i>	<i>44.23%</i>	<i>5,183</i>	<i>34.12%</i>	<i>116</i>	<i>44.62%</i>	<i>3,434</i>	<i>22.61%</i>
Middle	105	40.38%	5,836	38.42%	49	18.85%	2,892	19.04%
Upper	40	15.38%	4,171	27.46%	78	30.0%	7,617	50.14%
Unknown	0	0.0%	0	0.0%	17	6.54%	1,247	8.21%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	260	100.0%	15,190	100.0%	260	100.0%	15,190	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	8	66.67%	3,737	19.29%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>8</i>	<i>66.67%</i>	<i>3,737</i>	<i>19.29%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	3	25.0%	631	3.26%	0	0.0%	0	0.0%
Upper	1	8.33%	15,000	77.45%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	12	100.0%	19,368	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	19,368	100.0%	12	100.0%	19,368	100.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	368	11.17%	25,136	5.32%
Moderate	1,264	38.35%	164,410	34.81%	651	19.75%	63,474	13.44%
<i>Low/Moderate Total</i>	<i>1,264</i>	<i>38.35%</i>	<i>164,410</i>	<i>34.81%</i>	<i>1,019</i>	<i>30.92%</i>	<i>88,610</i>	<i>18.76%</i>
Middle	1,524	46.24%	204,974	43.4%	584	17.72%	72,540	15.36%
Upper	507	15.38%	102,779	21.76%	1,008	30.58%	194,108	41.1%
Unknown	1	0.03%	176	0.04%	685	20.78%	117,081	24.79%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3,296	100.0%	472,339	100.0%	3,296	100.0%	472,339	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Community Trust Bank 2019
Knoxville TN MSA #28940 2016

Selected Year: 2016

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	59	3.2 %	4,911	1.8 %	185	9.9 %	14,370	5.4 %
Moderate	510	27.2 %	64,223	24.0 %	397	21.2 %	43,254	16.1 %
<i>Low/Moderate Total</i>	<i>569</i>	<i>30.4 %</i>	<i>69,134</i>	<i>25.8 %</i>	<i>582</i>	<i>31.1 %</i>	<i>57,624</i>	<i>21.5 %</i>
Middle	1,033	55.2 %	149,553	55.8 %	371	19.8 %	48,547	18.1 %
Upper	271	14.5 %	49,431	18.4 %	523	27.9 %	108,414	40.4 %
Unknown	0	0.0 %	0	0.0 %	397	21.2 %	53,533	20.0 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	1,873	100.0 %	268,118	100.0 %	1,873	100.0 %	268,118	100.0 %
	Refinance							
Low	30	2.5 %	1,754	1.0 %	107	8.8 %	7,205	4.1 %
Moderate	356	29.4 %	46,601	26.5 %	175	14.5 %	17,501	10.0 %
<i>Low/Moderate Total</i>	<i>386</i>	<i>31.9 %</i>	<i>48,355</i>	<i>27.5 %</i>	<i>282</i>	<i>23.3 %</i>	<i>24,706</i>	<i>14.1 %</i>
Middle	634	52.4 %	93,149	53.1 %	213	17.6 %	24,483	13.9 %
Upper	191	15.8 %	34,064	19.4 %	441	36.4 %	86,261	49.1 %
Unknown	0	0.0 %	0	0.0 %	275	22.7 %	40,118	22.9 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	1,211	100.0 %	175,568	100.0 %	1,211	100.0 %	175,568	100.0 %
	Home Improvement							
Low	11	3.7 %	487	3.8 %	70	23.3 %	1,358	10.6 %
Moderate	120	39.9 %	3,918	30.5 %	61	20.3 %	1,637	12.8 %
<i>Low/Moderate Total</i>	<i>131</i>	<i>43.5 %</i>	<i>4,405</i>	<i>34.3 %</i>	<i>131</i>	<i>43.5 %</i>	<i>2,995</i>	<i>23.4 %</i>
Middle	144	47.8 %	6,393	49.8 %	74	24.6 %	3,162	24.7 %
Upper	26	8.6 %	2,027	15.8 %	86	28.6 %	5,731	44.7 %
Unknown	0	0.0 %	0	0.0 %	10	3.3 %	937	7.3 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	301	100.0 %	12,825	100.0 %	301	100.0 %	12,825	100.0 %
	Multi-Family							
Low	3	18.8 %	657	1.7 %	0	0.0 %	0	0.0 %
Moderate	8	50.0 %	37,321	96.2 %	0	0.0 %	0	0.0 %
<i>Low/Moderate Total</i>	<i>11</i>	<i>68.8 %</i>	<i>37,978</i>	<i>97.9 %</i>	<i>0</i>	<i>0.0 %</i>	<i>0</i>	<i>0.0 %</i>
Middle	5	31.3 %	809	2.1 %	0	0.0 %	0	0.0 %
Upper	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Unknown	0	0.0 %	0	0.0 %	16	100.0 %	38,787	100.0 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	16	100.0 %	38,787	100.0 %	16	100.0 %	38,787	100.0 %
	HMDA Totals							
Low	103	3.0 %	7,809	1.6 %	362	10.6 %	22,933	4.6 %
Moderate	994	29.2 %	152,063	30.7 %	633	18.6 %	62,392	12.6 %
<i>Low/Moderate Total</i>	<i>1,097</i>	<i>32.3 %</i>	<i>159,872</i>	<i>32.3 %</i>	<i>995</i>	<i>29.3 %</i>	<i>85,325</i>	<i>17.2 %</i>
Middle	1,816	53.4 %	249,904	50.5 %	658	19.3 %	76,192	15.4 %
Upper	488	14.3 %	85,522	17.3 %	1,050	30.9 %	200,406	40.5 %
Unknown	0	0.0 %	0	0.0 %	698	20.5 %	133,375	26.9 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	3,401	100.0 %	495,298	100.0 %	3,401	100.0 %	495,298	100.0 %

Peer Group HMDA Loan Distribution Table

Exam ID: Community Trust Bank 2019
Knoxville TN MSA #28940 2015

Selected Year: 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	41	2.6%	3,283	1.5%	159	10.1%	11,714	5.3%
Moderate	431	27.5%	53,483	24.3%	316	20.1%	33,819	15.4%
<i>Low/Moderate Total</i>	<i>472</i>	<i>30.1%</i>	<i>56,766</i>	<i>25.8%</i>	<i>475</i>	<i>30.3%</i>	<i>45,533</i>	<i>20.7%</i>
Middle	826	52.6%	115,617	52.5%	305	19.4%	39,047	17.7%
Upper	270	17.2%	47,609	21.6%	468	29.8%	95,782	43.5%
Unknown	1	0.1%	174	0.1%	321	20.5%	39,804	18.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,569	100.0%	220,166	100.0%	1,569	100.0%	220,166	100.0%
	Refinance							
Low	33	2.9%	1,926	1.2%	110	9.6%	6,289	4.0%
Moderate	322	28.0%	40,478	26.1%	173	15.1%	15,623	10.1%
<i>Low/Moderate Total</i>	<i>355</i>	<i>30.9%</i>	<i>42,404</i>	<i>27.3%</i>	<i>283</i>	<i>24.7%</i>	<i>21,912</i>	<i>14.1%</i>
Middle	628	54.7%	85,159	54.8%	207	18.0%	23,268	15.0%
Upper	165	14.4%	27,734	17.9%	440	38.3%	76,297	49.1%
Unknown	0	0.0%	0	0.0%	218	19.0%	33,820	21.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,148	100.0%	155,297	100.0%	1,148	100.0%	155,297	100.0%
	Home Improvement							
Low	6	2.9%	205	1.7%	40	19.2%	399	3.3%
Moderate	78	37.5%	3,250	26.5%	41	19.7%	1,650	13.5%
<i>Low/Moderate Total</i>	<i>84</i>	<i>40.4%</i>	<i>3,455</i>	<i>28.2%</i>	<i>81</i>	<i>38.9%</i>	<i>2,049</i>	<i>16.7%</i>
Middle	106	51.0%	6,570	53.6%	63	30.3%	2,956	24.1%
Upper	18	8.7%	2,237	18.2%	56	26.9%	6,769	55.2%
Unknown	0	0.0%	0	0.0%	8	3.8%	488	4.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	208	100.0%	12,262	100.0%	208	100.0%	12,262	100.0%
	Multi-Family							
Low	1	5.6%	693	6.1%	0	0.0%	0	0.0%
Moderate	8	44.4%	5,679	49.8%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>9</i>	<i>50.0%</i>	<i>6,372</i>	<i>55.9%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	7	38.9%	4,914	43.1%	0	0.0%	0	0.0%
Upper	2	11.1%	110	1.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	18	100.0%	11,396	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	18	100.0%	11,396	100.0%	18	100.0%	11,396	100.0%
	HMDA Totals							
Low	81	2.8%	6,107	1.5%	309	10.5%	18,402	4.6%
Moderate	839	28.5%	102,890	25.8%	530	18.0%	51,092	12.8%
<i>Low/Moderate Total</i>	<i>920</i>	<i>31.3%</i>	<i>108,997</i>	<i>27.3%</i>	<i>839</i>	<i>28.5%</i>	<i>69,494</i>	<i>17.4%</i>
Middle	1,587	53.2%	212,260	53.2%	575	19.5%	65,271	16.4%
Upper	455	15.5%	77,690	19.5%	964	32.8%	178,848	44.8%
Unknown	1	0.0%	174	0.0%	565	19.2%	85,508	21.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,943	100.0%	399,121	100.0%	2,943	100.0%	399,121	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Community Trust Bank 2019

Selected Year: 2017

Non Metropolitan West Virginia 2017

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	12	5.97%	702	3.49%
Moderate	15	7.46%	1,166	5.8%	40	19.9%	2,500	12.44%
<i>Low/Moderate Total</i>	15	7.46%	1,166	5.8%	52	25.87%	3,202	15.93%
Middle	146	72.64%	14,135	70.31%	53	26.37%	4,310	21.44%
Upper	39	19.4%	4,746	23.61%	81	40.3%	10,911	54.28%
Unknown	1	0.5%	56	0.28%	15	7.46%	1,680	8.36%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	201	100.0%	20,103	100.0%	201	100.0%	20,103	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	9	6.38%	429	2.61%
Moderate	11	7.8%	962	5.86%	16	11.35%	1,191	7.26%
<i>Low/Moderate Total</i>	11	7.8%	962	5.86%	25	17.73%	1,620	9.87%
Middle	102	72.34%	10,767	65.59%	41	29.08%	3,779	23.02%
Upper	28	19.86%	4,687	28.55%	58	41.13%	8,590	52.33%
Unknown	0	0.0%	0	0.0%	17	12.06%	2,427	14.78%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	141	100.0%	16,416	100.0%	141	100.0%	16,416	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	5	6.49%	23	0.85%
Moderate	5	6.49%	29	1.08%	18	23.38%	648	24.03%
<i>Low/Moderate Total</i>	5	6.49%	29	1.08%	23	29.87%	671	24.88%
Middle	60	77.92%	2,164	80.24%	19	24.68%	628	23.29%
Upper	12	15.58%	504	18.69%	33	42.86%	1,279	47.42%
Unknown	0	0.0%	0	0.0%	2	2.6%	119	4.41%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	77	100.0%	2,697	100.0%	77	100.0%	2,697	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	160	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	160	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	160	100.0%	1	100.0%	160	100.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	26	6.19%	1,154	2.93%
Moderate	31	7.38%	2,157	5.48%	74	17.62%	4,339	11.02%
<i>Low/Moderate Total</i>	31	7.38%	2,157	5.48%	100	23.81%	5,493	13.95%
Middle	309	73.57%	27,226	69.14%	113	26.9%	8,717	22.14%
Upper	79	18.81%	9,937	25.24%	172	40.95%	20,780	52.77%
Unknown	1	0.24%	56	0.14%	35	8.33%	4,386	11.14%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	420	100.0%	39,376	100.0%	420	100.0%	39,376	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Community Trust Bank 2019

Selected Year: 2016

Non Metropolitan West Virginia 2016

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0 %	0	0.0 %	18	7.8 %	847	3.9 %
Moderate	3	1.3 %	170	0.8 %	53	23.0 %	3,102	14.3 %
<i>Low/Moderate Total</i>	<i>3</i>	<i>1.3 %</i>	<i>170</i>	<i>0.8 %</i>	<i>71</i>	<i>30.9 %</i>	<i>3,849</i>	<i>18.2 %</i>
Middle	227	98.7 %	21,578	99.2 %	52	22.6 %	4,493	20.7 %
Upper	0	0.0 %	0	0.0 %	83	36.1 %	11,003	50.6 %
Unknown	0	0.0 %	0	0.0 %	24	10.4 %	2,303	10.6 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	230	100.0 %	21,748	100.0 %	230	100.0 %	21,748	100.0 %
	Refinance							
Low	0	0.0 %	0	0.0 %	5	3.1 %	355	1.8 %
Moderate	1	0.6 %	78	0.4 %	23	14.5 %	1,748	9.1 %
<i>Low/Moderate Total</i>	<i>1</i>	<i>0.6 %</i>	<i>78</i>	<i>0.4 %</i>	<i>28</i>	<i>17.6 %</i>	<i>2,103</i>	<i>11.0 %</i>
Middle	158	99.4 %	19,114	99.6 %	35	22.0 %	3,502	18.2 %
Upper	0	0.0 %	0	0.0 %	75	47.2 %	9,681	50.4 %
Unknown	0	0.0 %	0	0.0 %	21	13.2 %	3,906	20.4 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	159	100.0 %	19,192	100.0 %	139	100.0 %	19,192	100.0 %
	Home Improvement							
Low	0	0.0 %	0	0.0 %	10	9.3 %	230	8.2 %
Moderate	1	0.9 %	2	0.1 %	27	25.2 %	365	13.0 %
<i>Low/Moderate Total</i>	<i>1</i>	<i>0.9 %</i>	<i>2</i>	<i>0.1 %</i>	<i>37</i>	<i>34.6 %</i>	<i>395</i>	<i>21.3 %</i>
Middle	106	99.1 %	2,797	99.9 %	32	29.9 %	675	24.1 %
Upper	0	0.0 %	0	0.0 %	38	35.5 %	1,529	54.6 %
Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	107	100.0 %	2,799	100.0 %	107	100.0 %	2,799	100.0 %
	Multi-Family							
Low	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Moderate	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0 %</i>	<i>0</i>	<i>0.0 %</i>	<i>0</i>	<i>0.0 %</i>	<i>0</i>	<i>0.0 %</i>
Middle	1	100.0 %	25	100.0 %	0	0.0 %	0	0.0 %
Upper	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Unknown	0	0.0 %	0	0.0 %	1	100.0 %	25	100.0 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	1	100.0 %	25	100.0 %	1	100.0 %	25	100.0 %
	HMDA Totals							
Low	0	0.0 %	0	0.0 %	33	6.6 %	1,432	3.3 %
Moderate	5	1.0 %	250	0.6 %	103	20.7 %	5,215	11.9 %
<i>Low/Moderate Total</i>	<i>5</i>	<i>1.0 %</i>	<i>250</i>	<i>0.6 %</i>	<i>136</i>	<i>27.4 %</i>	<i>6,647</i>	<i>15.2 %</i>
Middle	492	99.0 %	43,514	99.4 %	119	23.9 %	8,670	19.8 %
Upper	0	0.0 %	0	0.0 %	196	39.4 %	22,213	50.8 %
Unknown	0	0.0 %	0	0.0 %	46	9.3 %	6,234	14.2 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	497	100.0 %	43,764	100.0 %	497	100.0 %	43,764	100.0 %

Peer Group HMDA Loan Distribution Table

Exam ID: Community Trust Bank 2019

Selected Year: 2015

Non Metropolitan West Virginia 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	18	8.8%	729	3.2%
Moderate	5	2.5%	327	1.4%	35	17.2%	2,362	10.3%
<i>Low/Moderate Total</i>	<i>5</i>	<i>2.5%</i>	<i>327</i>	<i>1.4%</i>	<i>53</i>	<i>26.0%</i>	<i>3,091</i>	<i>13.5%</i>
Middle	194	95.1%	21,943	95.6%	37	18.1%	3,587	15.6%
Upper	0	0.0%	0	0.0%	82	40.2%	12,099	52.7%
Unknown	5	2.5%	674	2.9%	32	15.7%	4,167	18.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	204	100.0%	22,944	100.0%	204	100.0%	22,944	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	7	4.7%	523	3.2%
Moderate	4	2.7%	187	1.2%	22	14.8%	1,615	10.0%
<i>Low/Moderate Total</i>	<i>4</i>	<i>2.7%</i>	<i>187</i>	<i>1.2%</i>	<i>29</i>	<i>19.5%</i>	<i>2,138</i>	<i>13.3%</i>
Middle	142	95.3%	15,558	96.4%	30	20.1%	2,629	16.3%
Upper	0	0.0%	0	0.0%	74	49.7%	9,346	57.9%
Unknown	3	2.0%	386	2.4%	16	10.7%	2,018	12.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	149	100.0%	16,131	100.0%	149	100.0%	16,131	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	8	6.5%	174	4.9%
Moderate	3	2.4%	12	0.3%	24	19.4%	429	12.1%
<i>Low/Moderate Total</i>	<i>3</i>	<i>2.4%</i>	<i>12</i>	<i>0.3%</i>	<i>32</i>	<i>25.9%</i>	<i>603</i>	<i>17.0%</i>
Middle	121	97.6%	3,534	99.7%	38	30.6%	1,161	32.7%
Upper	0	0.0%	0	0.0%	51	41.1%	1,592	44.9%
Unknown	0	0.0%	0	0.0%	3	2.4%	190	5.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	124	100.0%	3,546	100.0%	124	100.0%	3,546	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	100.0%	164	100.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>1</i>	<i>100.0%</i>	<i>164</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	164	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	164	100.0%	1	100.0%	164	100.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	33	6.9%	1,426	3.3%
Moderate	13	2.7%	690	1.6%	81	16.9%	4,406	10.3%
<i>Low/Moderate Total</i>	<i>13</i>	<i>2.7%</i>	<i>690</i>	<i>1.6%</i>	<i>114</i>	<i>23.8%</i>	<i>5,832</i>	<i>13.6%</i>
Middle	457	95.6%	41,035	95.9%	105	22.0%	7,377	17.2%
Upper	0	0.0%	0	0.0%	207	43.3%	23,037	53.8%
Unknown	8	1.7%	1,060	2.5%	52	10.9%	6,539	15.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	478	100.0%	42,785	100.0%	478	100.0%	42,785	100.0%

APPENDIX G

GLOSSARY OF TERMS

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of 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 refinancing of home improvement and home purchase loans.

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

Limited-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 aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An 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. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an 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 evaluation. 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.