

PUBLIC DISCLOSURE

June 28, 2010

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Community Trust Bank, Inc.
RSSD # 509811

346 North Mayo Trail
Pikeville, Kentucky 41501

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 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.

TABLE OF CONTENTS

I.	Institution Rating	
a.	Overall Rating	1
b.	Performance Test Ratings Table	1
c.	Summary of Major Factors Supporting Rating	2
II.	Institution	
a.	Description of Institution	3
b.	Scope of Examination	6
c.	Conclusions with Respect to Performance Tests	8
III.	Huntington-Ashland WV-KY-OH Multistate Metropolitan Area	
a.	Multistate Metropolitan Area Rating	13
b.	Scope of Examination	13
c.	Description of Institution's Operations	14
d.	Conclusions with Respect to Performance Tests	18
IV.	Commonwealth of Kentucky	
a.	Summary	
1.	State Rating	25
2.	Scope of Examination	25
3.	Description of Institution's Operations	26
4.	Conclusions with Respect to Performance Tests	26
b.	Eastern Kentucky Nonmetropolitan Area (full-scope review)	
1.	Description of Institution's Operations	29
2.	Conclusions with Respect to Performance Tests	33
c.	Central Kentucky #1 Nonmetropolitan Area (full-scope review)	
1.	Description of Institution's Operations	39
2.	Conclusions with Respect to Performance Tests	43
d.	Lexington Metropolitan Area (full-scope review)	
1.	Description of Institution's Operations	49
2.	Conclusions with Respect to Performance Tests	53
e.	Central Kentucky #2 Nonmetropolitan Area (limited-scope review)	
1.	Description of Institution's Operations	59

V.	State of West Virginia	
a.	Summary	
1.	State Rating.....	62
2.	Scope of Examination.....	62
3.	Description of Institution’s Operations.....	63
4.	Conclusions with Respect to Performance Tests.....	63
b.	Nonmetropolitan Area #1 (full-scope review)	
1.	Description of Institution’s Operations.....	66
2.	Conclusions with Respect to Performance Tests.....	69
c.	Nonmetropolitan Area #2 (limited-scope review)	
1.	Description of Institution’s Operations.....	72
d.	Charleston Metropolitan Area (limited-scope review)	
1.	Description of Institution’s Operations.....	75
VI.	Appendix	
a.	Scope of Examination Table.....	78
b.	Summary of State and Multistate Metropolitan Area Ratings.....	79
c.	Bank and Aggregate Lending Comparison Tables.....	80
d.	Glossary.....	89
e.	Assessment Area Maps.....	93

INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: Satisfactory

The following table indicates the performance level of Community Trust Bank with respect to the lending, investment, and Service Tests.

PERFORMANCE LEVELS	<u>Community Trust Bank</u>		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors supporting the institution's rating include:

- An adequate responsiveness to the credit needs of the community;
- A good geographic distribution of loans throughout the assessment area;
- A good distribution among borrowers of different income levels and businesses of different revenue sizes;
- A relatively high level of community development lending;
- A relatively high level of qualified community development investments and grants;
- Occasionally in a leadership position in providing community development investments and grants;
- Retail delivery systems that 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 relatively high level of community development services.

INSTITUTION

DESCRIPTION OF INSTITUTION

Community Trust Bank (CTB), a wholly owned subsidiary of Community Trust Bancorp (Bancorp), had total assets of \$3.1 billion as of the December 31, 2009 Uniform Bank Performance Report (UBPR). This represents a 7.3% increase in assets from December 31, 2007. Both CTB and the Bancorp are headquartered in Pikeville, Kentucky. CTB subsidiaries include a community development corporation (Pikeville, KY), an insurance service company (Pikeville, KY), and an ownership interest in Banker's Title of Central Kentucky (Lexington, KY).

CTB provides a full range of personal and business deposit and loan products, internet banking, and telephone banking services. As of March 31, 2010, CTB had deposits of \$2.5 billion and loans of \$2.4 billion. Loans represented 78% of the bank's average assets and are comprised of real estate loans at 63.0%, commercial loans at 11.0%, and consumer loans at 22.0% of average gross loans.

Description of Assessment Area

The 34 counties in which CTB operates were divided into eight assessment areas for this evaluation as follows:

- Huntington-Ashland, WV-KY-OH Multi-State MSA (Metropolitan Statistical Area)
 - This assessment area consists of portions of the Huntington multi-state MSA, including all of Cabell and Wayne Counties in West Virginia, all of Boyd County in Kentucky, and the southern portion of Greenup County in Kentucky. Three tracts in northern Greenup County are excluded due to their distance from the bank's branches. Lawrence County in Ohio is also excluded, as it is separated by the Ohio River and the bank has no branches in Ohio.
 - The assessment area has seven branches, which comprises 9.2% of total branches.

- Eastern Kentucky Nonmetropolitan Area
 - This assessment area consists of six counties in southeastern Kentucky, including Pike, Letcher, Knott, Perry, Floyd, and Johnson Counties. Pikeville and Prestonsburg are the two predominate cities. The counties are predominately rural.
 - The assessment area has 24 branches, which comprises 31.6% of total branches.

- Lexington-Fayette, KY MSA
 - The assessment area consists of Fayette, Clark, Scott, and Woodford Counties. The assessment area excludes Bourbon and Jessamine Counties. Bourbon County lies northeast of Lexington and Jessamine County lies southwest of Lexington. The bank has no branches or significant lending in these two counties. Lexington in Fayette County is the major city in the assessment area, followed by Georgetown in Scott County and Winchester in Clark County.
 - The assessment area has ten branches, which comprises 13.2% of total branches.
- Central Kentucky Nonmetropolitan Area #1
 - This assessment area consists of 15 counties in Kentucky and one county in Tennessee. The Kentucky counties include Franklin, Mercer, Boyle, Marion, Taylor, Green, Adair, Russell, Pulaski, Whitley, Bell, Laurel, Rockcastle, Madison, and Montgomery. Three counties, Casey, Lincoln, and Garrard, are excluded from the assessment area, since there are no branches and minimal lending. Clairborne County in Tennessee is not considered a separate assessment area, since it abuts Bell County in Kentucky and has no branches. This county is included given the level of lending from the Middlesboro office in this county. The counties in this assessment area are predominately rural; however, Franklin County includes the state capital of Frankfort and Madison County includes the city of Richmond, which is home to Eastern Kentucky University.
 - The assessment area has 28 branches, which comprises 36.8% of total branches.
- Central Kentucky Nonmetropolitan Area #2
 - This assessment area consists solely of Fleming County, Kentucky. The county is predominately rural with no major cities.
 - The assessment area has three branches, which comprises 3.9% of total branches.
- Charleston, WV MSA
 - This assessment area consists solely of Lincoln County in West Virginia, which is the westernmost county in the MSA. Boone, Clay, Kanawha, and Putnam Counties in the MSA are excluded, as the bank has no branches in these counties. The city of Charleston is located in Kanawha County. Lincoln County is predominately rural with no major cities.
 - The assessment area has two branches, which comprises 2.6% of total branches.
- Nonmetropolitan Area, Mingo, WV
 - This assessment area consists solely of Mingo County in West Virginia, which runs along the Kentucky-West Virginia border across from Pike County, Kentucky. Mingo County is predominately rural with no major cities.
 - The assessment area has one branch, which comprises 1.3% of total branches.

- Nonmetropolitan Area, Nicholas, WV
 - This assessment area consists solely of Nicholas County in West Virginia, which is just east of Kanawha County. Nicholas County is predominately rural with no major cities.
 - The assessment area has one branch, which comprises 1.3% of total branches.

A detailed description of each assessment area is presented in subsequent sections of this performance evaluation and assessment area maps may be found in Appendix E.

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

Previous Performance Evaluation

The previous evaluation, dated June 2, 2008, was rated "Satisfactory." The lending and Service Tests were rated "High Satisfactory" and the Investment Test was rated "Outstanding." The Huntington-Ashland multistate metropolitan area was rated "Satisfactory." The investment and Service Tests were rated "Low Satisfactory," while the Lending Test was rated "High Satisfactory." The Commonwealth of Kentucky was rated "Satisfactory" overall, with the lending and Service Tests rated "High Satisfactory." The Investment Test was rated "Outstanding." The State of West Virginia was rated "Satisfactory" overall, with the investment and Service Tests rated "Low Satisfactory." The Lending Test was rated "High Satisfactory."

SCOPE OF EXAMINATION

CTB's lending performance was evaluated using loan data for the period of January 1, 2008 through December 31, 2009. The lending products reviewed for this evaluation include mortgage loans subject to the reporting requirements of the Home Mortgage Disclosure Act (HMDA), small business loans, and small farm loans.

In addition, the bank's 2008 lending performance was compared to the 2008 aggregate performance of all lenders required to report HMDA and CRA data within the respective assessment areas. Due to the timing of this report, 2008 aggregate data was the most recent data available.

In all assessment areas, HMDA loans received the most weight due to the high dollar amount of total loans. Business and farm lending received less weight, based on volume.

The geographic distribution of loans was evaluated using data from the 2000 United States Census Bureau report.

For HMDA lending, the analysis of the bank's distribution of loans to borrowers of different income categories was based on adjusted median family income statistics from the United States Department of Housing and Urban Development (HUD) for 2009.

The level and extent of the bank's involvement in community development activities for the period of June 2, 2008 through June 28, 2010 was also reviewed as part of this evaluation. Specifically, community development loans and investments funded by the bank since the previous examination were reviewed for the Lending and Investment Tests. Community development services in which the bank has been involved since the previous examination were also evaluated for the Service Test.

The bank's assessment areas in Nonmetropolitan Eastern Kentucky and Nonmetropolitan Central Kentucky #1 are given the largest amount of weight in this evaluation because they are the largest assessment areas, contain the largest percentage of branches, and originated the largest amount of loans by volume. The bank's main office is located in the Nonmetropolitan Eastern Kentucky assessment area and of the 76 offices located throughout the bank's assessment area, 52 (68.4%) are located within these two assessment areas. The following table lists the bank's assessment areas in order of weight ranking, with the top five receiving full scope reviews and the last three receiving limited scope reviews:

Assessment Area	Number of Offices	Percent of Offices	Deposit Share ¹	HMDA Loan Share	Small Business Loan Share	Small Farm Loan Share
Non-MSA Eastern KY	24	31.6%	43.9%	47.4%	36.4%	1.0%
Non-MSA Central KY #1	28	36.8%	26.5%	30.7%	22.6%	23.8%
Lexington-Fayette KY MSA	10	13.2%	8.0%	9.7%	19.8%	8.4%
Huntington-Ashland WV-KY-OH Multi-State MSA	7	9.2%	8.2%	5.0%	9.2%	0%
Non-MSA Central KY #2	3	3.9%	4.8%	3.0%	5.9%	66.8%
Non-MSA West Virginia #1	1	1.3%	2.4%	3.0%	2.3%	0%
Non-MSA West Virginia #2	1	1.3%	3.9%	0.6%	3.5%	0%
Charleston WV MSA	2	2.6%	2.1%	0.5%	0.3%	0%
Totals	76	100%	100%	100%	100%	100%

HMDA lending represented 75% of lending and was weighted most heavily, followed by small business lending at 21.6% and small farm lending at 3.8%. Small business loans secured by real estate were included in the small business loan analysis due to the small volume of lending in this product type. Also, other commercial and personal loan products offered by the bank not reported under HMDA or CRA were not considered in this evaluation.

Ten interviews with community representatives were conducted during the course of the evaluation. Details from these interviews are presented in subsequent sections of this performance evaluation.

A summary of the scope is listed in Appendix A.

¹ According to the June 30, 2009 FDIC deposit market share reports.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

CTB's performance under the Lending Test is rated "High Satisfactory." CTB's performance in its most significant state, Kentucky, was rated "High Satisfactory." The Huntington-Ashland multistate metropolitan area and the State of West Virginia were rated "Low Satisfactory"

Throughout this report, references are made to CTB's and the peer's lending distribution by geography and borrower income. Detailed information about the bank's and peer's percentage of HMDA-reportable and CRA-reportable loans can be found in Appendix C. In some assessment areas and product discussions, specific numbers are quoted from these tables to support relevant points; otherwise, only general references are made comparing performance and the reader should refer to the tables for specific data.

Lending Activity

Lending activity reflects an adequate responsiveness to the credit needs of the bank's assessment areas, taking into consideration CTB's strategic objectives, economic conditions, and competitive factors. The State of West Virginia, Commonwealth of Kentucky, and the Huntington-Ashland multistate MSA reflected an adequate responsiveness to the credit needs of the bank's assessment area. The table below provides data regarding the bank's volume of lending during the review period.

SUMMARY OF LENDING ACTIVITY				
January 1, 2008 – December 31, 2009				
Loan Type	#	%	\$(000s)	%
HMDA home purchase	1,583	17.4	175,372	21.5
HMDA refinancing	3,423	37.6	388,930	47.6
HMDA home improvement	1,617	17.8	33,087	4.1
Total HMDA-related	6,623	72.8	597,389	73.2
Total small business	2,007	22.1	201,765	24.7
Total small farm	468	5.1	17,253	2.1
TOTAL LOANS	9,098	100.0	816,407	100.0

Following the national trend among all lenders, the volume of lending by number of loans and dollar amount not only decreased from the previous examination, but also during the period under review. The housing crisis and subsequent recession, which included dramatic declines in home sales and new construction and plummeting home values, was further aggravated as the economy continued to weaken and unemployment increased. As a result, home purchase and refinance lending declined in the majority of markets served by CTB.

Among the 463 lenders serving CTB's assessment areas, CTB ranked third in consolidated mortgage loan originations and purchases. Countrywide, FSB ranked first, ranking second was Chase Bank, NA.

CTB ranked seventh among those lenders reporting small business and small farm loans. American Express, FSB ranked first, followed by Chase Bank, NA and GE Capital Financial. As can be seen by the rankings among small business lenders, the top three are major credit card issuers providing commercial credit card accounts nationwide.

Assessment Area Concentration

The table below shows the distribution of loans inside and outside of the bank's assessment areas. A high percentage of CTB's loans were made inside the respective assessment areas.

Lending Inside and Outside the Assessment Area								
Loan Type	Inside the Assessment Area				Outside the Assessment Area			
	# of Loans	%	\$ (000s)	%	# of Loans	%	\$ (000s)	%
Home Purchase - Conventional	1358	85.8	142,601	81.3	225	14.2	32,771	18.7
Home Improvement	1491	92.2	29,187	88.2	126	7.8	3,900	11.8
Refinancing	3043	88.9	343,054	88.2	380	11.1	45,876	11.8
Total HMDA related	5892	89.0	514,842	86.2	731	11.0	82,547	13.8
Small Business	1519	86.5	131,380	80.0	237	13.5	32,811	20.0
Small Bus. - Secured by Real Estate	190	75.7	29,550	78.6	61	24.3	8,024	21.4
Total Small Bus. Related	1,709	85.2	160,930	79.8	298	14.8	40,835	20.2
Small Farm	298	63.7	9,694	56.2	170	36.3	7,559	43.8
Total Loans	7,899	86.8	685,466	84.0	1,199	13.2	130,941	16.0

Geographic and Borrower Distribution

The institution's geographic distribution of lending and the borrower distribution of lending are good. The geographic distribution of lending in the Huntington-Ashland multistate MSA was adequate and the Commonwealth of Kentucky was good. The geographic distribution within the State of West Virginia was poor. The borrower distribution in the state of Kentucky was good and the State of West Virginia and Huntington-Ashland multistate MSA was adequate.

In addition to the traditional lending program the bank is a leader within the Commonwealth of Kentucky in providing Small Business Administration (SBA) loans. During the assessment period, the bank originated 143 SBA loans for a total of \$14.0 million. Additionally, CTB offers a first-time homebuyers program, the Homestead Loan Program. This program offers low-income individuals the opportunity to purchase a home with reduced down payments and closing costs, higher debt ratios, higher loan-to-value ratios, and lower interest rates depending on income levels. A total of 65 loans were originated within the overall assessment area for a total of \$5.7 million. Both programs demonstrate CTB's flexibility in providing loan programs outside of traditional credit products.

Also, while CTB does not offer financing under the FHA, VA, or Rural Housing Programs, CTB has established a relationship with another lender to refer customers interested in these programs.

Community Development Loans

CTB originated a relatively high level of community development loans. During the period under review, the bank originated 18 loans totaling \$6,179,668. This was a significant increase since the previous examination, with a 157.1% increase in volume and approximately a 100.0% increase by dollar amount. Of the total community development loans, \$4,987,709 (81.0%) was to assist in providing low- and moderate-income individuals with services and the remaining \$1,191,959 (19.0%) was for the purpose of economic development. Of the 18 total loans, 16 (\$6,121,573) were originated within the Commonwealth of Kentucky, resulting in a relatively high level of community development loans. Two (\$58,095) community development loans were originated in the Huntington-Ashland MSA, resulting in an adequate level of community development loans. There were no community development loans originated in the State of West Virginia, resulting in a poor level of community development loans.

Investment Test

CTB's performance under the Investment Test is rated "High Satisfactory." A total of \$22,648,789 in community development investments were made during the review period. This represents a 2.0% increase since the previous evaluation. Of the total investments, 38.0% was in the Huntington-Ashland MSA, which is a significant increase since the previous examination, where only 6% of community development investments were in the Huntington-Ashland MSA. This assessment area represents 9.2% of branch offices, 8.2% of deposits, and 5.0% of mortgage lending. The Investment Test for the Huntington-Ashland MSA was rated "Outstanding." Further, 52.5% of community development investments were made in the Commonwealth of Kentucky, which is down significantly from the previous evaluation, where 89.0% of community development investments benefited the Commonwealth despite 85.6% of branch offices and 83.2% of deposits in the Commonwealth of Kentucky. As a result, the Investment Test rating for the Commonwealth of Kentucky was "High Satisfactory." Investments in the State of West Virginia represented 7.5% of total investments and was rated "Low Satisfactory."

A total of \$11,604,266 was a result of CTB's ongoing investment in the CRA Fund Advisors, which invests in affordable housing securitizations (FNMA/GNMA loan pools) and is comprised of loans to low- and moderate-income borrowers. \$7,931,644 million (68.0% of funding) was invested in the Commonwealth of Kentucky, \$1,222,926 was invested in West Virginia, and \$1,989,618 was invested in the Huntington-Ashland MSA. The remaining \$460,078 was invested in states outside of West Virginia or Kentucky.

CTB participated in the Federal Home Loan Bank of Cincinnati's Affordable Housing Program to make funds available in the form of grants to assist homebuyers under the Welcome Home program. Welcome Home funds may be used to fund reasonable down payments and closing costs incurred in conjunction with the acquisition of owner-occupied housing to be used as primary residences by low- and moderate-income homebuyers. CTB made one Welcome Home grant at the maximum of \$5,000. Under the FHLB of Cincinnati's American Dream Homeownership Challenge (providing down payment assistance to low-income borrowers) CTB made 20 grants for a total of \$200,000. Both grants were for borrowers within the Lexington-Fayette Kentucky metropolitan statistical area.

A total of \$10,839,523 of community development investments were made in the form of tax credits, grants, stock, and certificates of deposits. \$3,789,000 was in the Commonwealth of Kentucky, \$480,000 to the State of West Virginia, and \$6,570,523 to the Huntington-Ashland MSA.

See the discussion under each assessment area for details regarding the bank's activity in a particular assessment area.

Service Test

Performance under the Service Test is rated "High Satisfactory." Within the Huntington-Ashland MSA, services was rated "Outstanding." The Commonwealth of Kentucky's service rating was "High Satisfactory" and the State of West Virginia's rating was rated "Low Satisfactory."

Retail Services

Branch delivery systems, as well as a variety of consumer and business banking products and alternative delivery systems such as ATMs, telephone and internet banking, are accessible to essentially all portions of the bank's assessment areas. The bank's record of opening and closing branches has not impacted the accessibility of its delivery systems in low- and moderate-income geographies or to low- or moderate-income individuals. Banking services do not vary in a way that inconveniences certain portions of the bank's assessment areas, particularly in low- and moderate-income geographies or low- or moderate-income individuals.

Community Development Services

The bank provides a relatively high level of community development services throughout its assessment areas. A total of 1,156 qualified service hours were provided during the assessment period. Of this total, 1,064 were within the Commonwealth of Kentucky, 27 were within the State of West Virginia, and 65 were within the Huntington-Ashland MSA. CTB provides a relatively high level of community development services, including services to low- and moderate-income individuals, small businesses and small farms, economic development, and affordable housing in the Commonwealth of Kentucky, and is a leader in providing services within the Huntington-Ashland MSA. CTB provides a low level of community development services in the State of West Virginia's assessment areas.

Employees of CTB spent numerous hours providing financial expertise through their involvement with community development organizations throughout the assessment areas by serving as board directors, loan committee members, or treasurers.

Fair Lending or Other Illegal Credit Practices Review

No violations of the substantive provisions of the antidiscrimination laws and regulations were noted.

MULTISTATE METROPOLITAN AREA

HUNTINGTON-ASHLAND, WV-KY-OH MULTISTATE MSA CRA RATING:² *Satisfactory*

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors supporting the multi-state rating include:

- An adequate responsiveness to the credit needs of the community;
- An adequate geographic distribution of loans throughout the assessment area;
- An adequate distribution among borrowers of different income levels and businesses of different revenue sizes;
- An adequate level of community development lending;
- A significant 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 readily 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,
- An excellent level of community development services.

Scope of Examination

The scope of the examination for the Huntington-Ashland MSA is consistent with the scope of the examination for the institution. A full scope review of the assessment area was conducted.

²This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained within the multistate metropolitan area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HUNTINGTON-ASHLAND, WV-KY-OH MULTISTATE MSA

The Huntington-Ashland WV-KY-OH Multi-State MSA is comprised of the entireties of Cabell and Wayne Counties in western West Virginia, Boyd and Greenup Counties in northeastern Kentucky, and Lawrence County in south central Ohio. This assessment area includes all of Cabell and Wayne Counties in West Virginia, all of Boyd County in Kentucky, and the southern portion of Greenup County in Kentucky. Three tracts in northern Greenup County are excluded due to their distance from the bank's branches. Lawrence County in Ohio is also excluded, as it is separated by the Ohio River and the bank has no branches in Ohio. The assessment area is comprised of 57 census tracts, of which there are three low-income, 13 moderate-income, 26 middle-income, and 15 upper income tracts.

Within the assessment area, CTB ranks ninth in total deposits with 4.7% of total deposits as of June 30, 2009. The top three market share holders were National City Bank (9.3%), Branch Banking and Trust Co. (9.2%), and City National Bank of West Virginia (8.5%). The top three market share holders collectively had approximately 27.0% of the deposit market share, which indicates the MSA is highly competitive. Currently, this assessment area represents 5.0% of CTB's total home mortgage loans and 9.2% of small business loans.

To determine credit needs and opportunities in the Huntington-Ashland assessment area, two interviews focusing on economic development were conducted with local community organizations. This information was also supplemented with demographic and economic data pertinent to the area. The contact in Ashland described the city in a state of stability, still recovering from the departure of Ashland Oil Company in the mid-1990s. The contact identified the need for outreach programs directed towards small businesses. CTB was specifically mentioned as a leader in working with small businesses. The second contact described the Huntington economy as being driven mainly by Marshall University and two local hospitals. Regarding specific credit needs within Huntington, the contact stated that start-up businesses always have difficulty obtaining financing and specific outreach programs focused on providing education to small businesses would be beneficial.

Population Characteristics

According to 2000 Census data, while the population of the MSA is 288,649, approximately 75.0% of the population (211,382) resides in this assessment area and 17.5% of the population lives in the moderate-income census tracts.

Income Characteristics

For the purposes of evaluating the loan distribution to borrowers of different income levels, incomes were classified based upon annually adjusted median family income data made available by HUD. According to the 2000 Census, the median family income in 2009 for the assessment area was \$48,000, which is above the 2009 Commonwealth of Kentucky median family income of \$42,300 and the 2009 State of West Virginia's \$43,100.

The distribution of families by income within the assessment area is as follows: 21.2% are low-income, 16.9% moderate-income, 19.9% middle-income, and 42.0% upper-income. Families living below the poverty level represent 13.1% of the total families in the assessment area. The level of families living below the poverty level is slightly higher in Kentucky at 14.8% and West Virginia at 15.4%.

Housing Characteristics

According to the 2000 Census, the assessment area contains 96,196 housing units, of which 64.2% are owner occupied, 26.4% are rental units, and 9.4% are vacant. In low-income tracts, 4.2% are owner-occupied; in moderate-income tracts, 50.4% are owner-occupied; in middle-income tracts, 69.3% are owner occupied; and in upper-income tracts, 69.5% are owner-occupied.

The percentage of units housing 1-4 families was 78.5%, while 9.7% of units house five families or more and 11.7% of units are mobile homes.

The median age of the housing stock was 36 years, which is above the Commonwealth of Kentucky's (27) and State of West Virginia's (31).

As of the 2000 Census, the median housing value in the assessment area was \$68,152. The median housing value in upper-income census tracts (\$84,151) had a disparity with housing values in both moderate- (\$48,730) and low- (\$46,364) income census tracts. According to Sperling's Best Places,³ the Huntington-Ashland metro area's median home cost for 2009 is \$83,930. Additionally, home appreciation for the last year has been 1.1%.

³ www.bestplaces.net

Labor, Employment, and Economic Characteristics

The city of Huntington, West Virginia is primarily located in Cabell County and is the largest populated city in the MSA and the second-largest city in West Virginia, behind Charleston. Ashland, Kentucky is located in Boyd County and is the second-largest city in the MSA. Ashland is an important economic and medical center for northeastern Kentucky. In addition to coal mining, which is a major industry in the eastern region of Kentucky, other major employers in the Huntington-Ashland area include, but are not limited to, the following:

Ashland, Kentucky	Huntington, West Virginia
AK Steel (merger Armco and Kawasaki)	Marshall University
King's Daughter Medical Center	St. Mary's Hospital
Marathon Ashland Petroleum	Marathon Ashland Petroleum
Morehead State University	Cabell-Huntington Hospital
Ashland Community College	CSX Huntington
	Applied Card Systems
	Alcon Surgical
	U.S. Army Corp of Engineers
	Client Logic

Area unemployment rates remain higher in Kentucky⁴ than in either West Virginia or nationwide. Unemployment rates⁵ in West Virginia remain below nationwide unemployment rates. For comparison purposes, area unemployment rates are presented in the table below:

Unadjusted Unemployment	April, 2010	Annual 2009
Boyd County (Ashland, KY)	8.4	8.5
Greenup County (KY)	9.1	9.4
Kentucky	10.2	10.5
Cabell County (Huntington, WV)	7.9	6.8
Wayne County (WV)	8.6	8.0
West Virginia	7.9	8.8
U.S. (nationwide)	9.5	9.3

The following table indicates the assessment area 2010 demographics based on data from the 2000 Census:

4 <http://www.workforcekentucky.ky.gov>

5 <https://www.workforcewv.org/LMI/cntydata.cfm>

Combined Demographics Report

Community Trust Bank

Assessment Area(s): Huntington-Ashland MSA 26580

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	5.3	294	0.5	139	47.3	12,565	21.2
Moderate-income	13	22.8	9,833	16.6	2,625	26.7	10,023	16.9
Middle-income	26	45.6	31,077	52.3	3,656	11.8	11,845	19.9
Upper-income	15	26.3	18,203	30.6	1,391	7.6	24,974	42.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	57	100.0	59,407	100.0	7,811	13.1	59,407	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,330	99	0.2	4.2	1,961	84.2	270	11.6
Moderate-income	18,077	9,103	14.7	50.4	6,656	36.8	2,318	12.8
Middle-income	47,449	32,897	53.2	69.3	10,298	21.7	4,254	9.0
Upper-income	28,340	19,696	31.9	69.5	6,479	22.9	2,165	7.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	96,196	61,795	100.0	64.2	25,394	26.4	9,007	9.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	672	9.0	565	8.7	73	11.7	34	11.8
Moderate-income	1,115	15.0	974	14.9	104	16.6	37	12.9
Middle-income	3,315	44.6	2,909	44.6	282	45.1	124	43.2
Upper-income	2,333	31.4	2,075	31.8	166	26.6	92	32.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7,435	100.0	6,523	100.0	625	100.0	287	100.0
Percentage of Total Businesses:				87.7		8.4		3.9
	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	9	8.9	9	8.9	0	0.0	0	0.0
Middle-income	63	62.4	63	62.4	0	0.0	0	0.0
Upper-income	29	28.7	29	28.7	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	101	100.0	101	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HUNTINGTON-ASHLAND, WV-KY-OH MULTISTATE MSA

Lending Test

The assessment area's Lending Test is considered "Low Satisfactory."

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs. During the evaluation period, CTB originated \$33.8 million in HMDA loans and \$15.9 million in small business loans in the assessment area. This represented 5.0% of the total HMDA lending and 9.2% of total small business lending activity for CTB. The level of lending is below the percentage of offices (9.2%) and slightly above the percentage of deposits (4.7%) located within this assessment area. Overall, CTB ranks tenth among 175 HMDA reporters. The bank ranks 12th among 40 small business reporters lending in the assessment area, which is a decrease from sixth out of 33 ranking at the previous examination.

Geographic Distribution

The geographic distribution of loans reflects an adequate penetration throughout the assessment area.

During this assessment period, CTB made loans in 35 of the 57 census tracts for a tract penetration rate of 61.4%. Two out of three low-income census tracts did not receive a loan, primarily due to a high rental rate (83.3% average between the two) and a low population (average of 4,403) with a limited number of families (average of 207). There are limited lending opportunities within these two census tracts. Further, CTB penetrated 53.8% of the moderate-income tracts. Overall, 13.8% of HMDA lending was in moderate-income census tracts, which is good compared to the 14.7% of owner-occupied housing units located within these census tracts.

Home Mortgage Lending

Within the low-income census tracts, 68.7% of the housing units are five or more units, compared to a 4.3% owner occupancy level. Additionally, 84.2% of the housing units are rentals within the low-income census tracts. Given the low owner occupancy and high rental rates, there is a limited opportunity for home purchase, refinance, and improvement type lending within low-income census tracts.

The geographic distribution of home mortgage lending is adequate.

Home Purchase Loans

The geographic distribution of home purchase loans is adequate.

CTB originated no loans in low-income tracts, which is below the percentage of owner-occupied units in those tracts (0.2%). For 2008, the bank made no loans in low-income tracts, which is below the aggregate of all lenders amount of 1.2%. Thus, the geographic distribution of home purchase loans to low-income census tracts is poor. There were nine loans (13%) in moderate-income tracts, which is below the percentage of owner-occupied units in those tracts (14.7%). For 2008, the bank made 15.0% of home purchase loans in moderate-income tracts, which is above the aggregate of all lenders amount of 10.6%. Thus, the geographic distribution of home purchase loans to moderate-income census tracts is good.

CTB made 39.1% of its home purchase loans in middle-income tracts and 47.8% of its home purchase loans in upper-income tracts, compared to the percentage of owner-occupied units in these tracts at 53.2% and 31.9%. For 2008, CTB originated 30.0% and 55.0% of home purchase loans in the middle- and upper-income census tracts, respectively. The aggregate of all HMDA lenders made 48.0% and 40.2% of their loans in middle- and upper-income tracts.

Refinance Loans

The geographic distribution of home refinance loans is adequate.

CTB originated no loans in low-income tracts, which is below the percentage of owner-occupied units in those tracts (0.2%). For 2008, the bank made no loans in low-income tracts, which is below the aggregate of all lenders amount of 0.3%. Thus, the geographic distribution of refinance loans to low-income census tracts is poor. There were 16 loans (8.7%) in moderate-income tracts, which is below the percentage of owner-occupied units in those tracts (14.7%). For 2008, the bank made 14.5% of refinance loans in moderate-income tracts, which is above the aggregate of all lenders amount of 6.9%. Thus, the geographic distribution of refinance loans to moderate-income census tracts is adequate.

CTB made 32.6% of its refinance loans in middle-income tracts and 58.7% of its refinance loans in upper-income tracts, compared to the percentage of owner-occupied units in these tracts at 53.2% and 31.9%. For 2008, CTB originated 24.2% and 61.3% of refinance loans in the middle- and upper-income census tracts, respectively. The aggregate of all HMDA lenders made 53.1% and 39.7% of their loans in middle- and upper-income tracts.

Home Improvement Loans

The geographic distribution of home improvement loans is good.

CTB originated no loans in low-income tracts, which is below the percentage of owner-occupied units in those tracts (0.2%). For 2008, the bank made no loans in low-income tracts, which is below the aggregate of all lenders amount of 0.2%. Thus, the geographic distribution of home improvement loans to low-income census tracts is poor. There were 16 loans (36.4%) in moderate-income tracts, which is above the percentage of owner-occupied units in those tracts (14.7%). For 2008, the bank made 28.6% of home improvement loans in moderate-income tracts, which is above the aggregate of all lenders amount of 9.1%. Thus, the geographic distribution of refinance loans to moderate-income census tracts is excellent.

CTB made 36.4% of its refinance loans in middle-income tracts and 27.3% of its refinance loans in upper-income tracts, compared to the percentage of owner-occupied units in these tracts at 53.2% and 31.9%. For 2008, CTB originated 38.1% and 33.3% of refinance loans in the middle- and upper-income census tracts, respectively. The aggregate of all HMDA lenders made 58.5% and 32.2% of their loans in middle- and upper-income tracts.

Small Business Loans

Penetration throughout the assessment area was considered poor.

During the evaluation period, CTB originated 157 loans in an aggregate amount of \$15.9 million, of which 3 loans (2%) were made in low-income tracts and 18 loans (11.5%) were made in moderate-income tracts, both of which are less than the percentage of business located in these census tracts at 9% and 15% for the low- and moderate-income tracts respectively. For 2008, the bank originated 1.3% of small business loans in low-income census tracts and 10.7% in moderate-income census tracts. The average of all CRA lenders originated 9.1% in low-income tracts and 13.3% in moderate-income tracts respectively.

The bank originated 59.2% and 27.4% of its small business loans in middle- and upper-income tracts, compared to the proxy at 44.6% and 31.4%, respectively. For 2008, the bank originated 62.7% and 25.3% of its small business loans to middle- and upper-income tracts, compared to the aggregate of all CRA lenders originating 40.6% and 31.2% in middle- and upper-income geographies.

Distribution of Loans by Borrower Income Level and Revenue Size of Business

CTB has an adequate penetration among borrowers of different income levels and businesses of different sizes.

Lending to Borrowers of Different Income Levels

The bank's overall lending to low- and moderate-income borrowers is adequate considering that the credit needs of the low- and moderate-income segment of the population are difficult to address through conventional loan products, presenting a significant obstacle to homeownership. In particular, 36.8% of the assessment area's renters expend more than 30.0% of gross income for housing, making it difficult for renters to save the customary down payment and closing costs necessary to purchase a home. In addition, 13.2% of families residing in this assessment area live below the poverty level, making it difficult for them to qualify for a loan considering the affordability of housing.

While CTB does not offer financing under the FHA, VA, or Rural Housing programs, CTB has established a relationship with another lender to refer customers interested in these programs.

Home Purchase Loans

The borrower distribution of home purchase loans is poor.

CTB originated four loans (5.8%) to low-income borrowers, which is significantly less than the percentage of families in these tracts at 21.2%. In 2008, CTB originated 7.5% of home purchase loans to low-income borrowers, which is above the aggregate of all peer lending at 6.8%. Thus, the borrower distribution of home purchase loans to low-income borrowers is poor.

CTB originated eight home purchase loans (11.6%) to moderate-income borrowers, which is less than the percentage of families in these tracts at 16.9%. In 2008, CTB originated 12.5% of home purchase loans to moderate-income borrowers, which is below the aggregate of all peer lending at 18.3%. Thus, the borrower distribution of home purchase loans to moderate-income borrowers is adequate.

CTB made 15.9% of its home purchase loans to middle-income borrowers and 63.8% of its home purchase loans to upper-income borrowers, compared to the percentage of families in these tracts at 19.9% and 42.0%, respectively. In 2008, CTB made 12.5% of its home purchase loans to middle-income borrowers and 65.0% of its home purchase loans to upper-income borrowers. The aggregate of all HMDA lenders made 24.9% and 43.5% of home purchase loans to middle- and upper-income borrowers, respectively. The bank originated 2.9% of its home purchase loans to borrowers with unknown incomes.

Refinance Loans

The borrower distribution of home refinance loans is adequate.

CTB originated three refinance loans (1.6%) to low-income borrowers, which is significantly less than the percentage of families in these tracts at 21.2%. In 2008, CTB originated no refinance loans to low-income borrowers, which is below the aggregate of all peer lending at 6.6%. Thus, the borrower distribution of refinance loans to low-income borrowers is poor.

CTB originated 21 refinance loans (11.4%) to moderate-income borrowers, which is less than the percentage of families in these tracts at 16.9%. In 2008, CTB originated 17.7% of refinance loans to moderate-income borrowers, which is above the aggregate of all peer lending at 13.1%. Thus, the borrower distribution of refinance loans to moderate-income borrowers is good.

CTB made 26.6% of its refinance loans to middle-income borrowers and 60.3% of its refinance loans to upper-income borrowers, compared to the percentage of families in these tracts at 19.9% and 42.0%, respectively. In 2008, CTB made 25.8% of its refinance loans to middle-income borrowers and 56.5% of its refinance loans to upper-income borrowers. The aggregate of all HMDA lenders made 22.2% and 48.6% of refinance loans to middle- and upper-income borrowers, respectively.

Home Improvement Loans

The borrower distribution of home improvement loans is good.

CTB originated seven (15.9%) home improvement loans to low-income borrowers, which is less than the percentage of families in these tracts at 21.2%. In 2008, CTB originated 14.3% of home improvement loans to low-income borrowers, which is above the aggregate of all peer lending at 8.6%. Thus, the borrower distribution of home improvement loans to low-income borrowers is good.

CTB originated eight home improvement loans (18.2%) to moderate-income borrowers, which is greater than the percentage of families in these tracts at 16.9%. In 2008, CTB originated 14.3% of home improvement loans to moderate-income borrowers, which is below the aggregate of all peer lending at 19.4%. Thus, the borrower distribution of home improvement loans to moderate-income borrowers is good.

CTB made 13.6% of its home improvement loans to middle-income borrowers and 52.3% of its home improvement loans to upper-income borrowers, compared to the percentage of families in these tracts at 19.9% and 42.0% respectively. In 2008, CTB made 23.8% of its home improvement loans to middle-income borrowers and 47.6% of its home improvement loans to upper-income borrowers. The aggregate of all HMDA lenders made 22.1% and 47.0% of home improvement loans to middle- and upper-income borrowers, respectively.

Small Business Loans

Of the 157 small business loans, 80 (51%) were originated to businesses with less than \$1 million in revenues, compared to the proxy at 87.7%. During 2008, CTB originated 65.3% of business loans to businesses with less than \$1 million in revenues compared to the aggregate of all CRA lenders who made 29.5% of all businesses in this assessment area. Based on this analysis, the bank's lending to small businesses is adequate.

Further analysis shows that 71.3% of the bank's small business loans were extended in an amount of \$100,000 or less. In 2008, the bank lent 77.3% of small business loans in an amount of \$100,000 or less, which is below the aggregate of all CRA lenders' amount of 94.0%. Since smaller size loans are generally commensurate with the borrowing needs of smaller businesses, CTB's lending activity demonstrates that the bank is adequately meeting the credit needs of such businesses.

Community Development Lending

CTB made an adequate level of community development loans by originating two community development loans totaling \$58,095 in the support of economic development during this review period. This represents 0.5% of the total community development lending during the assessment period.

Investment Test

CTB's community development investment performance is "Outstanding."

CTB has an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. Bank investments total \$8,560,141 for this evaluation period, representing an increase of 613.3% since the previous evaluation. \$6,570,523 of the total was in the form of two different investments (grant and tax credit).

\$1,989,618 in investments were funded in this assessment area as a result of CTB's ongoing investment in the CRA Fund Advisors, which invests in affordable housing securitizations (FNMA/GNMA loan pools) and is comprised of loans to low- and moderate-income borrowers.

Of the bank's total community development investment dollars, 37.8% supported the Huntington-Ashland Multi-state MSA. CTB exhibits an excellent responsiveness to credit and community economic development needs through the use of investments.

Service Test

Performance under the Service Test is rated "Outstanding."

Retail Services

The bank's delivery systems are readably accessible to the bank's geographies and individuals of different income levels in its assessment area. The bank operates seven branches, six with full-service ATMs, and one independent cash-only ATM. When comparing the distribution of branches by census tract income level to the percentage of the population living within each census tract income level, the distribution is accessible in the low- and moderate-income geographies and to individuals of different income levels.

The following table indicates the total distribution of CTB’s branches and ATMs compared to families by tract income:

Geography	Number of Branches	Percent	Number of ATMs	Percent	Percent Families by Tract Income	Percent of Population by Tract
Low-income	1	14.3%	1	12.5%	0.5%	2.6%
Moderate-Income	1	14.3%	1	12.5%	16.6%	17.5%
Middle-Income	2	28.6%	3	37.5%	52.3%	50.0%
Upper-Income	3	42.9%	3	37.5%	30.6%	30.2%
Totals	7	100.0%	8	100.0%	100.0%	100.0%

No branch offices were opened or closed in this assessment area; therefore, the bank’s record of opening and closing offices has not adversely affected the accessibility of its services, particularly to low- or moderate-income geographies and low- and moderate-income individuals.

Community Development Services

CTB is a leader in providing community development services. In addition to the service listed below, employees provided financial expertise on the boards of the Salvation Army and the Huntington Regional Chamber of Commerce. A total of 65 service hours were provided during this assessment period, which represents 5.6% of the total service hours provided across all assessment areas.

- *Neighbors Helping Neighbors* – Within the MSA, this organization empowers LMI individuals to take responsibility and access resources to resolve crisis situations (crisis management). A bank employee provides financial expertise as a board member.

COMMONWEALTH OF KENTUCKY

CRA RATING FOR COMMONWEALTH OF KENTUCKY⁶: *Satisfactory*

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors supporting this rating include:

- A good responsiveness to the credit needs of the community;
- A good geographic distribution of loans throughout the assessment area;
- A good distribution among borrowers of different income levels and businesses of different revenue sizes;
- A relatively high level of community development lending;
- A relatively high 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 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 relatively high level of community development services.

SCOPE OF EXAMINATION

The scope of the examination for the Commonwealth of Kentucky is consistent with the scope of examination for the institution. The full-scope evaluations of the Eastern and Central nonmetropolitan areas and Lexington-Fayette MSA received greater weight than the limited scope assessment areas.

⁶For 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

The Commonwealth of Kentucky is comprised of 120 counties; however, CTB only operates in 26 counties, excluding Boyd and Greenup, which were previously reviewed in the multistate metropolitan area. These 26 counties are analyzed in four separate assessment areas (Eastern Kentucky Non-metropolitan, Central Kentucky #1 and #2 Non-metropolitan, and Lexington-Fayette KY MSA) as described in subsequent sections of this evaluation. The assessment area is comprised of 259 census tracts, of which 11 are low-income, 55 are moderate-income, 135 are middle-income, 57 are upper-income, and one is unknown-income.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COMMONWEALTH OF KENTUCKY

Lending Test

The Lending Test for the Commonwealth of Kentucky is rated "High Satisfactory." CTB's lending reflected a good responsiveness to the credit needs in the three full-scope assessment areas, while Nonmetropolitan Central Kentucky #2 lending was consistent with the overall state performance.

Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix C.

Lending Activity

Lending activity within the Commonwealth of Kentucky is good. As of June 30, 2009, CTB was seventh in the state with a 3.2% market share of deposits. National City Bank had the greatest market share at 8.5%, followed by CTB Bank with 7.2%. Within the Commonwealth of Kentucky, CTB originated 1,245 home purchase, 2,766 refinance, 1,345 home improvement, 1,448 small business, and 298 small farm loans. Mortgage loans totaled \$468,484,000 and small business and small farm lending totaled \$148,146,000. As of June 30, 2009, deposits within Kentucky constituted 90.3% of the bank's total deposits compared to 89.9% of CTB's loans originated in Kentucky.

Geographic and Borrower Distribution

The distribution of loans among geographies is good. The geographic distribution of loans was good in the Nonmetropolitan Eastern Kentucky assessment area, excellent in the Nonmetropolitan Central Kentucky #1 assessment area, and good in the Lexington-Fayette Kentucky Metropolitan area.

The distribution of loans among borrower income levels is good. The borrower distribution of loans was adequate in the Nonmetropolitan Eastern Kentucky assessment area, good in the Nonmetropolitan Central Kentucky #1 assessment area, and good in the Lexington-Fayette Kentucky Metropolitan area.

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

Community Development Loans

Within the Commonwealth of Kentucky, CTB originated 15 community development loans totaling \$6,096,658, which represented 88% by number and 99% by dollar amount of the bank's community development lending. Overall, CTB made a relatively high level of community development loans in the Commonwealth of Kentucky. There was a relatively high level of community development lending in the Eastern Kentucky and Central Kentucky #1 assessment areas and an adequate level of lending within the Lexington-Fayette MSA.

Investment Test

CTB's performance under the Investment Test within the assessment areas located in the Commonwealth of Kentucky is rated "High Satisfactory." The most heavily weighted assessment area (Eastern Kentucky) had an adequate level of investments, the Central Kentucky #1 assessment area had a relatively high level of investments, the Lexington-Fayette MSA investment performance was excellent, and the Central Kentucky #2 assessment area was below the overall state rating performance.

During the evaluation period, community development investments within the state totaled nearly \$11.9 million, which is a decrease of 42.1% from the previous evaluation. The state total investments represent 52.6% of total investments.

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

Service Test

CTB's performance in the Commonwealth of Kentucky under the Service Test is rated "High Satisfactory." Each of the three full scope assessment areas provided a good level of services and in the Central Kentucky# 2 assessment area, services were consistent with the overall state rating.

Retail Services

The bank's delivery systems are accessible to the geographies and individuals of different income levels with the assessment area. The bank's record of opening and closing offices has not adversely affected the accessibility of its services, particularly to low- and moderate-income geographies and individuals.

Community Development Services

The Commonwealth of Kentucky received a relatively high level of community development services. The Eastern Kentucky assessment area received an adequate level, Central Kentucky #1 assessment area received a relatively high level, and within the Lexington-Fayette MSA CTB was a leader in providing community development services. In total, 92% of community development service hours were allocated to the Commonwealth of Kentucky.

NONMETROPOLITAN STATEWIDE AREAS
(full-scope review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMETROPOLITAN
EASTERN KENTUCKY**

The Eastern Kentucky Nonmetropolitan Area is comprised of the entireties of Floyd, Johnson, Knott, Letcher, Perry and Pike Counties. The assessment area is comprised of 55 census tracts, of which there are no low-income, 23 moderate-income, 30 middle-income, and two upper-income tracts.

This assessment area represented 42.9% of CTB's total deposits, 47.4% of home mortgage lending, 36.4% of small business lending, and 1.0% of small farm lending. According to the Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits⁷ as of June 30, 2009, the bank has \$1.1 billion in deposits and ranks first out of 14 institutions within this assessment area with 34.9% of total market deposits. These 14 institutions maintained 82 branches holding \$3.0 billion in deposits. Major banking competitors in the area include Citizens National Bank of Paintsville, Branch Banking & Trust Company, Peoples Bank & Trust Company of Hazard, and US Bank, N.A.

To determine credit needs and opportunities in the assessment area, two interviews focusing on low- and moderate-income individuals and small businesses were conducted with local community organizations. This information was also supplemented with demographic and economic data pertinent to the area. Regarding low- and moderate-income individuals, the contact specifically mentioned a need for more moderate-income housing. Additionally, the closures of two large factories in the area have resulted in significant job loss, which has compounded the recessionary effects. Regarding small businesses, the community contact stated that there has been a surge in the number of startup service businesses. The most difficult task these businesses face is the raising of capital. This has been due to the downturn in the economy, resulting in stricter underwriting standards. The contact felt that local financial institutions, specifically CTB, have performed very well and have done an outstanding job in supporting the contact's organization and local small businesses.

Population Characteristics

According to 2000 Census data, the population of this assessment area is 206,938 with Pike and Floyd Counties comprising 54% of Nonmetropolitan Eastern Kentucky's total population. Of the assessment area population, 76.1% are age 18 or older.

⁷ FDIC Summary of Deposits: www.fdic.gov (June 30, 2009 is the most recent date for which FDIC deposit data is available.)

Income Characteristics

According to the 2000 Census, the median family income for the assessment area is \$27,175, but ranged from a low of \$24,869 in Letcher County to a high of \$29,302 in Pike County.

From the income distribution perspective, 30.5% of the families in the assessment area are low-income, 17.8% are moderate-income, 17.7% are middle-income, and 34.1% are upper-income. Families living below the poverty level represent 23.6% of total families in the assessment area, which is practically twice the number of families living below the poverty level in Kentucky at 12.7%.

Housing Characteristics

According to the 2000 Census, the assessment area contains 91,435 housing units, of which 69.9% are owner-occupied, 19.6% are rental units and 10.5% are vacant units. In moderate-income tracts, 70.8% are owner-occupied; in middle-income tracts, 69.5% are owner-occupied; and in upper-income tracts, 68.3% are owner-occupied. The overall owner-occupancy rate in this assessment area is higher than Kentucky at 64.3%.

The percentage of units housing 1-4 families was 63.1%, while 3.9% of the housing units were five families or more and 32.9% were mobile homes.

The median age of the housing stock in the assessment area is 25 years, which is slightly lower than Kentucky's at 27 years.

Community contacts indicated that affordable housing is difficult to develop due to the additional costs of building on mountainous terrain (about 75.0% of the assessment area). As noted by the high percentage of mobile homes, many residents utilize mobile homes due to the lack of affordable housing in the area.

As of the 2000 Census, the median housing value in the assessment area was \$43,988. The median housing value in upper-income census tracts (\$74,235) had a disparity with housing values in both moderate- (\$36,666) and middle-income census tracts (\$47,631). According to Sperling's Best Places,⁸ as of 2010, the median home cost in the following cities throughout this assessment area was: Pikeville - \$141,170, Whitesburg - \$64,350, Hazard - \$79,100, and Hindman - \$87,220.

⁸ www.bestplaces.net

Labor, Employment, and Economic Characteristics

Despite the large low-income population and high poverty rate, there are no low-income tracts in the assessment area; however, 100% of the middle-income geographies are distressed and underserved.

Employment in the area is primarily in the health care and social services, professional, retail, mining (coal and natural gas), and transportation sectors. Primary employers in the assessment area include County Board of Education, Pikeville Medical Center, Highlands Hospital, CAM-KY, Wal-Mart Stores, Pikeville College, Kellogg, and Community Trust Bank.

The community contacts conducted within this assessment area described the significant reliance on the coal industry. Many local economies are correlated directly to the performance of the mining industry - when it is underperforming, resulting unemployment can have drastic effects on economic conditions. Additionally, contacts mentioned the attempt to diversify regional economies away from the positive correlation with the mining industry into medical and retail related fields.

Area unemployment rates remain higher within the counties of Eastern Kentucky versus either the Commonwealth of Kentucky or nationwide. For comparison purposes, area unemployment rates are presented in the table below:⁹

Unadjusted Unemployment	Annual 2009	April 2010
Floyd	11.1	12.1
Johnson	10.5	11.4
Knott	10.7	12.5
Letcher	10.9	11.0
Perry	10.9	11.1
Pike	9.8	9.9
Kentucky	10.5	10.2
U.S. (nationwide)	9.3	9.5

The following table indicates 2010 demographic information based on data from the 2000 Census:

⁹ <http://www.bls.gov/lau/>

Combined Demographics Report

Community Trust Bank

Assessment Area(s): NonMSA Eastern KY

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	18,517	30.5
Moderate-income	23	41.8	22,248	36.6	6,372	28.6	10,843	17.8
Middle-income	30	54.5	35,834	59.0	7,625	21.3	10,735	17.7
Upper-income	2	3.6	2,688	4.4	367	13.7	20,675	34.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	55	100.0	60,770	100.0	14,364	23.6	60,770	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	33,301	23,588	36.9	70.8	6,135	18.4	3,578	10.7
Middle-income	54,114	37,588	58.8	69.5	10,875	20.1	5,651	10.4
Upper-income	4,020	2,747	4.3	68.3	925	23.0	348	8.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	91,435	63,923	100.0	69.9	17,935	19.6	9,577	10.5
	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	2,107	28.6	1,853	28.5	116	24.0	138	35.7
Middle-income	4,611	62.5	4,067	62.5	322	66.7	222	57.4
Upper-income	662	9.0	590	9.1	45	9.3	27	7.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7,380	100.0	6,510	100.0	483	100.0	387	100.0
Percentage of Total Businesses:				88.2		6.5		5.2
	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	20	29.0	20	29.0	0	0.0	0	0.0
Middle-income	44	63.8	44	63.8	0	0.0	0	0.0
Upper-income	5	7.2	5	7.2	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	69	100.0	69	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN EASTERN KENTUCKY

Lending Test

The Lending Test performance for the Eastern Kentucky assessment area is good. CTB's performance reflects a good responsiveness to the credit needs of the community, a good geographic distribution of loans in the area, and an adequate distribution among borrowers of different income levels and businesses of different revenue sizes. The bank made eight community development loans during the assessment period which is a relatively high level of community development lending.

In reaching a conclusion, the greatest weight was given to the evaluation of refinance loans, followed by small business, home purchase loans, and home improvement loans. Although small farm loans were reviewed, no analysis is presented due to the small number of loans.

Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix C.

Lending Activity

Lending activity is good. Within the assessment area, the bank originated 562 home purchase, 1,315 refinance, 918 home improvement, 565 small business loans, and three small farm loans. The home mortgage loan share for this assessment area was 47.4% and the small business loan share was 36.4% compared to the deposit share of 43.9%.

Geographic Distribution

Recognizing that CTB is a major competitor in this market, the distribution of loans among geographies is good. Refinance lending, which received the greatest weight, is good, while small business lending is excellent and home purchase and home improvement lending is good.

Within the Eastern Kentucky assessment area, CTB did not originate small business or small farm loans in three (13.0%) moderate- and one (3.3%) middle-income tracts. There was a mortgage loan originated in every census tract of this assessment area.

Home Purchase Loans

The distribution of home purchase loans among geographies is good.

The percentage of lending (28.8%) in moderate-income tracts was less than the percentage (36.9%) of owner-occupied units in these tracts. Additionally, the bank's 2008 lending (30.7%) outperformed peer lending (22.0%) within moderate-income tracts. Home purchase lending within moderate-income tracts is good. Lending in middle-income tracts was slightly above the percentage of owner-occupied units (exceptional performance given that all middle-income tracts are distressed/underserved), but lending in upper-income tracts significantly exceeded the proxy for demand.

Refinance Loans

The distribution of refinance loans among geographies is good.

Lending in moderate-income tracts at 28.2% was less than the percentage of owner-occupied housing at 36.9%. For 2008, bank refinance lending was at 31.6% and above peer at 24.8%. When taking into account economic conditions and competition the performance in moderate-income tracts is good. The percentage of lending in middle-income tracts was slightly above the proxy for demand; however, lending in upper-income tracts substantially exceeded the percentage of owner-occupied units in these tracts.

Home Improvement Loans

The distribution of home improvement loans among geographies is good.

Lending in moderate-income tracts at 34.5% was slightly less than the percentage of owner-occupied housing at 36.9%. For 2008, bank home improvement lending was at 35.4% and above peer at 27%. When taking into account economic conditions and competition, the performance in moderate-income tracts is excellent. The percentage of lending in middle- and upper-income tracts was in line with the proxy for demand.

Small Business Loans

Provided that small business lending is a specifically identified need, the geographic distribution of small business loans is excellent. Within moderate-income tracts, the percentage of lending at 28.5% was slightly less than the percentage of businesses located in these tracts at 28.6%, but the bank's performance was excellent. The bank's lending was comparable to peer. Lending in middle-income tracts was below proxy and lending in upper-income tracts was above the proxy.

Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans by borrower income and revenue size of the business is adequate. Refinance lending and home purchase lending is considered adequate, with small business and home improvement lending good.

Home Purchase Loans

Taking into consideration aggregate lending and the decline in home sales, the distribution of home purchase loans by borrower income is adequate.

The percentage of lending to low-income borrowers at 3.7% was significantly less than the percentage of low-income families at 30.5% and CTB's 2008 lending level (3.9%) was below the percentage of lending by peer institutions at 5.0%. Recognizing the level of lending by peer institutions, the high household poverty level (23.6% for the assessment area compared to 12.7% for the Commonwealth of Kentucky) in comparison to the affordability of housing and the high level of mobile home housing (32.9%), the percentage of lending to low income borrowers is adequate. Although some mobile homes secured to land will be included in home purchase lending, those mobile home loans not secured to land will be reflected as consumer loans and not included in this analysis.

Lending to moderate-income borrowers was good. The percentage of lending to moderate-income borrowers at 13.5% was below the proxy at 17.8% and, during 2008, was slightly above peer institutions. The percentage of lending to middle- and upper-income borrowers exceeded the percentage of middle- and upper-income families.

Refinance Loans

The distribution of refinance loans by borrower income is adequate.

The percentage of lending to low-income borrowers at 3.1% was considerably less than the percentage of low-income families, but was adequate considering aggregate lending performance. The percentage of lending (3.9%) during 2008 by CTB was also below peer institutions (6.3%). See poverty and mobile home housing performance context comments listed in the home purchase lending section above.

The percentage of lending to moderate-income families was significantly below the percentage of moderate-income families and 2008 lending was also below peer lending, reflecting a poor performance. Lending to both middle- and upper-income borrowers were both above the percentages of these respective families.

Home Improvement Loans

The distribution of home improvement loans by borrower income is good.

The percentage of lending to low-income borrowers at 14.2% was considerably less than the percentage of low-income families, but was adequate considering performance context. The percentage of lending (13.3%) during 2008 by CTB was above peer institutions (11.7%).

The percentage of lending to moderate-income families was slightly below the percentage of moderate-income families and 2008 lending was also slightly above peer lending, reflecting a good performance. Lending to both middle- and upper-income borrowers were above the percentages of these respective families.

Small Business Loans

The distribution of small business loans between businesses with gross annual revenues of \$1 million or less and those with revenues greater than \$1 million is good. Although 88.2% of the businesses in the assessment area had revenues of \$1 million or less, the bank made 67.7% of its loans to small businesses. However, this level of lending in 2008 (83.4%) was substantially higher than peer institutions, which made 34.4% of their loans to small businesses. The vast majority of loans to small businesses at 77.2% were in amounts of \$100,000 or less.

Community Development Loans

CTB originated eight community development loans during the assessment period. Five of those loans were originated during 2008 for an aggregate amount of \$701,583. The remaining three loans were originated during 2009 for an aggregate amount of \$590,242. The total amount of community development loans was \$1,291,825, all of which supported low- and moderate-income services. The community development lending in this assessment area represented 10.3% of the total community development lending for the assessment period. Additionally, this total represents a 752.3% increase in dollar amount of community development lending from the previous exam period's total of \$151,578, which was considered a low level. During this assessment period, CTB made a relatively high level of community development loans.

Investment Test

CTB provided an adequate level of community development investments during the review period. The institution funded nearly \$2.7 million in community development investments during the evaluation period, which reflects a decrease of 53.3% over the previous evaluation period. Of the bank's total community development investment dollars, 12.1% supported the Nonmetropolitan Eastern Kentucky assessment area.

CTB has an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors. CTB made one grant to a community development organization totaling \$675,000 that supported affordable housing initiatives through FHLB of Cincinnati's American Dream Homeownership Challenge for 45 rental units in Pike County.

The total dollar amount of funds invested in this assessment area as a result of CTB’s ongoing investment in the CRA Fund Advisors was \$2,064,102. The CRA Fund Advisors invests in affordable housing securitizations (FNMA/GNMA loan pools) comprised of loans to low- and moderate-income borrowers.

CTB exhibits adequate responsiveness to credit and community economic development needs through the use of investments.

Service Test

CTB provides a good level of services within this assessment area.

Retail Services

The bank’s delivery systems are accessible to the geographies and individuals of different income levels in its assessment area. The bank operates 24 branches, 19 full-service ATMs, and nine cash only ATMs in the Nonmetropolitan Eastern Kentucky assessment area. When comparing the distribution of branches by census tract income level to the percentage of the population living within each census tract income level, the distribution is accessible in the moderate- and middle-income geographies and to individuals of different income levels. Also, 79.0% of CTB’s branches and 68.0% of their ATMs serve either moderate- or distressed and underserved middle-income tracts, and 96.0% of the families reside in these geographies. The following table shows the total distribution of CTB’s branches and full-service ATMs compared to families by tract income:

Geography	Number of Branches	Percent	Number of ATMs	Percent	Percent Families by Tract Income	Percent of Population by Tract
Low-income	0	0.0%	0	0.0%	0.0%	0.0%
Moderate-Income	7	29.2%	8	28.6%	36.6%	36.9%
Middle-Income	12	50.0%	11	39.3%	59.0%	58.7%
Upper-Income	5	20.8%	9	32.1%	4.4%	3.6%
Totals	24	100%	28	100%	100%	100%

* There are no low-income geographies in this assessment area and all middle-income geographies are distressed.

No branches or full-service ATMs were opened or closed in this assessment area since the previous examination. The bank’s record of opening and closing offices has not adversely affected the accessibility of its services, particularly to moderate-income geographies and low- and moderate-income individuals.

Community Development Services

CTB provides an adequate level of community development services.

A total of 90 hours of financial expertise were contributed to organizations that provide community development services during this assessment period (7.8% of total service hours). The following are examples of community development services the bank provided during the evaluation period:

- County Chambers of Commerce, Industrial, and Extension Programs – These organizations promote economic development opportunities within their communities.
- Pine Mountain Community Development Corporation – This organization assists in obtaining access to capital and business development opportunities within Letcher County.
- HOMES, Inc. - Helping Our Mentally Ill Experience Success – This organization provides a variety of services for primarily low- and moderate-income individuals.
- REACH (Resources, Education, and Assistance for Community Housing) – This non-profit organization is committed to making housing more affordable for low- and moderate-income individuals and families in order to become first-time homebuyers.

NONMETROPOLITAN STATEWIDE AREAS

(full-scope review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMETROPOLITAN CENTRAL KENTUCKY #1

The Central Kentucky #1 Nonmetropolitan Area is comprised of the entireties of Adair, Bell, Boyle, Franklin, Green, Laurel, Madison, Marion, Mercer, Montgomery, Pulaski, Rockcastle, Russell, Taylor, and Whitley Counties in Kentucky and eight census tracts in Claiborne County, Tennessee. These eight adjacent tracts are being included into this assessment area because of the bank's lending activity in these tracts. A separate state rating is not warranted because the bank has no branch offices located in the State of Tennessee. The assessment area is comprised of 119 census tracts, of which there are two low-income, 17 moderate-income, 68 middle-income, and 32 upper-income tracts.

This assessment area represented 26.5% of CTB's total deposits, 30.7% of home mortgage lending, 22.6% of small business lending, and 23.8% of small farm lending. According to the Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits¹⁰ as of June 30, 2009, the bank has \$638 million in deposits, and ranks first out of 52 institutions within this assessment area with 8.2% of total market deposits. These 52 institutions maintained 251 branches holding \$7.8 billion in deposits. Major banking competitors in the area include Forcht National Bank, Farmers Bank and Trust, and Whitaker Bank.

To determine credit needs and opportunities in the assessment area, two interviews focusing on agriculture and affordable housing were conducted with a local community organization. This information was also supplemented with demographic and economic data pertinent to the area. In regards to affordable housing, the interviewee stated that low income tax credit projects are a valuable tool for developers and counties to provide affordable housing for low-income borrowers, but with the current economic conditions, the availability of these tax credits is declining and that current affordable housing projects may not be completed and new projects may not begin. In regards to agriculture, the interviewee stated that this area's agriculture credit needs are currently being met. There has been a transition away from small farms to larger farms due to government policies and economies of scale.

Population Characteristics

According to 2000 Census data, the population of the this assessment area is 497,144, with Madison, Pulaski, Laurel, and Franklin Counties accommodating 46% of Nonmetropolitan Central Kentucky #1's total population. Of the total population, 89.4% is 18 years or above.

¹⁰ FDIC Summary of Deposits: www.fdic.gov (June 30, 2009 is the most recent date for which FDIC deposit data is available.)

Income Characteristics

According to the 2000 Census, the median family income for the assessment area was \$34,721, but ranged from a high of \$51,052 in Franklin County to a low of \$23,818 in Bell County.

From the income distribution perspective, 20.9% of the families in the assessment area are designated as low-income, 16.4% are moderate-income, 19.6% are middle-income, and 43.23% are upper-income. Families living below the poverty level represent 15.4% of total families in the assessment area, which is above the percentage of families living below the poverty level in Kentucky at 12.7%.

Housing Characteristics

According to the 2000 Census, the assessment area contains 219,868 housing units, of which 64.2% are owner-occupied, 25.2% are rental units, and 10.7% are vacant units. In low-income tracts, 42.3% are owner-occupied; in moderate-income tracts, 64.3% are owner-occupied; in middle-income tracts, 64.4% are owner-occupied; and in upper-income tracts, 63.9% are owner-occupied. The overall owner-occupancy rate in this assessment area is equivalent to Kentucky's at 64.3%.

The percentage of units housing 1-4 families was 73.8%, while 6.9% of housing units are five families or more and 19.2% are mobile homes. The median age of the housing stock in the assessment area is 25 years, which is slightly lower than Kentucky's at 27 years.

As of the 2000 Census, the median housing value in the assessment area was \$68,600. The median housing value in upper-income census tracts (\$90,336) had a significant disparity with housing in both low- (\$21,518) and moderate-income census tracts (\$39,999) and, to a lesser degree, with middle-income census tracts (\$62,893). According to Sperling's Best Places,¹¹ as of 2010, the median home cost in the following cities throughout this assessment area was: Columbia - \$81,480; Greensburg - \$64,750; Campbellsville - \$87,320; London - \$94,540; Somerset - \$80,590; and Danville - \$111,670.

Labor, Employment, and Economic Characteristics

Despite the large low-income population and high poverty rate, there are only two low-income tracts in the assessment area; however, 63.2% of the middle-income geographies are distressed and/or underserved.

The following table lists counties that met these definitions during this evaluation period:

¹¹ www.bestplaces.net

Counties	Distressed (Poverty)		Underserved	
	2008	2009	2008	2009
Non-MSA Central KY #1				
Adair (5 tracts)	X	X		
Bell (1 tract = poverty and unemployment)	X	X		
Claiborne (7)	X			
Green (4 tracts)			X	X
Laurel (10 tracts)	X	X		
Rockcastle (4 tracts)	X	X		
Russell (4 tracts)	X	X	X	X
Taylor (4 tracts)		X		
Whitley (4 tracts)	X	X		

Employment in the area is primarily in the retail, construction, agriculture, health care, social services, professional, and manufacturing sectors. Major employers include Amazon.com, Cox International, Campbellsville School District, Campbellsville University, Campbellsville Apparel, Ingersoll-Rand Company, Taylor County Hospital, Taylor County School District, and Wal-Mart Stores.

Area unemployment rates remain higher within the counties of Central Kentucky versus either the Commonwealth of Kentucky, the State of Tennessee, or nationwide. Bell County continues to significantly exceed the state and national rates. For comparison purposes, area unemployment rates are presented in the table below:

Unadjusted Unemployment	Annual 2009	April 2010
Adair	11.0	10.2
Bell	12.1	12.5
Boyle	11.5	12.0
Franklin	9.0	8.5
Green	12.0	11.9
Laurel	10.3	10.2
Madison	9.2	8.5
Marion	13.3	11.7
Mercer	11.5	11.2
Montgomery	12.6	11.3
Pulaski	10.6	9.9
Rockcastle	13.3	10.7
Russell	12.3	11.2
Taylor	10.8	10.7
Whitley	11.4	11.5
Claiborne, TN	12.1	11.5
Kentucky	10.5	10.2
Tennessee	10.5	10.2
U.S. (nationwide)	9.3	9.5

The following table indicates 2010 demographic information based on data from the 2000 Census:

Combined Demographics Report

Community Trust Bank

Assessment Area(s): NonMSA Central KY1

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	1.7	460	0.3	157	34.1	29,068	20.9
Moderate-income	17	14.3	14,793	10.6	4,024	27.2	22,778	16.4
Middle-income	68	57.1	81,814	58.7	13,638	16.7	27,228	19.5
Upper-income	32	26.9	42,224	30.3	3,571	8.5	60,217	43.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	119	100.0	139,291	100.0	21,390	15.4	139,291	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	818	346	0.2	42.3	347	42.4	125	15.3
Moderate-income	22,813	14,667	10.4	64.3	5,683	24.9	2,463	10.8
Middle-income	130,282	83,852	59.5	64.4	30,615	23.5	15,815	12.1
Upper-income	65,955	42,178	29.9	63.9	18,709	28.4	5,068	7.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	219,868	141,043	100.0	64.1	55,354	25.2	23,471	10.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	39	0.2	35	0.2	1	0.1	3	0.4
Moderate-income	1,105	5.6	996	5.6	63	5.1	46	6.5
Middle-income	11,491	58.2	10,320	58.0	769	61.7	402	56.7
Upper-income	7,103	36.0	6,432	36.2	413	33.1	258	36.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	19,738	100.0	17,783	100.0	1,246	100.0	709	100.0
Percentage of Total Businesses:				90.1		6.3		3.6
	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	64	5.3	64	5.4	0	0.0	0	0.0
Middle-income	799	66.4	792	66.3	6	75.0	1	100.0
Upper-income	340	28.3	338	28.3	2	25.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,203	100.0	1,194	100.0	8	100.0	1	100.0
Percentage of Total Farms:				99.3		0.7		0.1

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN CENTRAL KENTUCKY #1

Lending Test

The Lending Test performance for the Central Kentucky #1 assessment area is good. CTB's performance reflects a good responsiveness to the credit needs of the community, an excellent geographic distribution of loans in the area, and a good distribution among borrowers of different income levels and businesses of different revenue sizes. The bank made three community development loans, which is considered a relatively high level of community development lending.

In reaching a conclusion, the greatest weight was given to the evaluation of refinance loans, followed by home purchase loans, small business loans, home improvement loans, and small farm loans.

Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix C.

Lending Activity

Lending activity is good. Within the assessment area, the bank originated 425 home purchase, 1,071 refinance, 314 home improvement, 386 small business loans, and 71 small farm loans. This assessment area represents 26.5% of the deposit market share and 30.7% of the home mortgage lending was originated within this assessment area. Additionally, 22.6% of the small business loans were distributed within this assessment area.

Geographic Distribution

Recognizing that CTB is a major competitor in this market, the distribution of loans among geographies is excellent. Refinance lending, which received the greatest weight, is excellent, and small business lending is also excellent. Home purchase and home improvement lending is good. Small farm lending was poor.

Within the Central Kentucky 1 assessment area, CTB did not originate small business or small farm loans in two low-income (100.0%), seven moderate-income (41.2%), 16 middle-income (23.5%), and two upper-income (6.3%) census tracts. Only 0.2% and 5.6% of the assessment areas' businesses are located in the low- and moderate-income census tracts, respectively. There was one moderate- (5.9%), one middle- (1.5%), and one upper-income census tract (3.1%) without a home mortgage loan origination.

Home Purchase Loans

The geographic distribution of home purchase loans is good.

The percentage of lending (0.2%) in low-income tracts was in line with the percentage (0.2%) of owner-occupied units in these tracts and 2008 home purchase lending was in line with aggregate lending. Lending in low-income tracts is excellent.

The percentage of lending (8.7%) in moderate-income tracts was below the percentage (10.4%) of owner-occupied units in these tracts. Additionally, the bank's 2008 lending (8.1%) outperformed peer lending (6.5%) within moderate-income tracts. Home purchase lending within moderate-income tracts is good. Lending in middle- and upper-income tracts was above the percentage of owner-occupied units.

Refinance Loans

The geographic distribution of refinance loans is excellent.

The percentage of lending (0.3%) in low-income tracts was in line with the percentage (0.2%) of owner-occupied units in these tracts and 2008 home purchase lending was above aggregate lending. Lending in low-income tracts is excellent.

Lending in moderate-income tracts at 12.3% was above the percentage of owner-occupied housing at 10.4%. For 2008, bank refinance lending was at 9.2% and above peer at 5.6%. When taking into account economic conditions and competition, the performance in moderate-income tracts is excellent. The percentage of lending in middle-income tracts was above the proxy for demand; however, lending in upper-income tracts was below the percentage of owner-occupied units in these tracts.

Home Improvement Loans

The geographic distribution of home improvement loans is good.

The percentage of lending (0.0%) in low-income tracts was below the percentage (0.2%) of owner-occupied units in these tracts. 2008 home purchase lending was in line with aggregate lending. Lending in low-income tracts is adequate, taking into account the limited opportunity offered within the low-income tracts, as represented by the high vacancy (15.3%) and high rental (42.4%) rates.

Lending in moderate-income tracts at 28.0% was substantially above the percentage of owner-occupied housing at 10.4%. For 2008, bank home improvement lending was at 23.2% and substantially above peer at 9.2%. When taking into account economic conditions and competition the performance in moderate-income tracts is excellent. The percentage of lending in middle-income tracts was in line with proxy and upper-income tracts were below the proxy for demand.

Small Business Loans

Provided that small business lending is a specifically identified need, the geographic distribution of small business loans is excellent. Within low-income tracts, the percentage of lending at 0.0% was below the percentage of businesses located in these tracts at 0.2% but the bank's performance is adequate when considering 2008 lending was in line with aggregate lending. Within moderate-income tracts, the percentage of lending at 6.7% was above the percentage of businesses located in these tracts at 5.6% and the bank's performance was excellent.

Small Farm Loans

Within low-income tracts, the percentage of lending at 0.0% was in line with the percentage of businesses located in these tracts at 0.1%. Lending within low-income tracts is adequate. Within moderate-income tracts, the percentage of lending at 1.4% was below the percentage of farms located in these tracts at 5.3% and the bank's performance was poor.

Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans by borrower income and revenue size of the business is good. Refinance and home purchase lending is considered adequate, with small business and small farm lending good. Home improvement lending is excellent.

Home Purchase Loans

Taking into consideration competitive factors and the decline in home sales, the distribution of home purchase loans by borrower income is adequate.

The percentage of lending to low-income borrowers at 5.2% was significantly less than the percentage of low-income families at 20.9% and CTB's 2008 lending level (5.6%) was above the percentage of lending by peer institutions at 3.9%. Recognizing the level of lending by peer institutions, the percentage of lending to low-income borrowers is adequate.

Lending to moderate-income borrowers was good. The percentage of lending to moderate-income borrowers at 16.2% was below the proxy at 16.4% and, during 2008, was slightly above peer institutions. The percentage of lending to middle-income borrowers exceeded the percentage of middle- and upper-income families.

Refinance Loans

The distribution of refinance loans by borrower income is adequate.

The percentage of lending to low-income borrowers at 6.1% was considerably less than the percentage of low-income families, but was adequate, considering aggregate lending. The percentage of lending (7.7%) during 2008 by CTB was above peer institutions (4.2%).

The percentage of lending to moderate-income families was significantly below the percentage of moderate-income families and 2008 lending was also below peer lending, reflecting an adequate performance. Lending to both middle- and upper-income borrowers were both above the percentages of these respective families.

Home Improvement Loans

The distribution of home improvement loans by borrower income is excellent.

The percentage of lending to low-income borrowers at 22.9%, was above the percentage of low-income families and is excellent. The percentage of lending (23.8%) during 2008 by CTB was above peer institutions (11.5%). Lending to low-income borrowers is excellent.

The percentage of lending to moderate-income families was slightly above the percentage of moderate-income families and 2008 lending was also above peer lending, reflecting an excellent performance. Lending to middle-income borrowers was above the proxy and lending to upper-income borrowers was below the percentages of these families.

Small Business Loans

The distribution of small business loans between businesses with gross annual revenues of \$1 million or less and those with revenues greater than \$1 million is good. Although 90.1% of the businesses in the assessment area had revenues of \$1 million or less, the bank made 76.7% of its loans to small businesses. However, this level of lending in 2008 (93.9%) was substantially higher than peer institutions, which made 32.5% of their loans to small businesses. The vast majority of loans to small businesses at 75.3% were in amounts of \$100,000 or less.

Small Farm Loans

The distribution of small farm loans between businesses with gross annual revenues of \$1 million or less and those with revenues greater than \$1 million is good. Although 99.3% of the farms in the assessment area had revenues of \$1 million or less, the bank made 90.1% of its loans to small farms. The vast majority of loans to small farms at 85.9% were in amounts of \$100,000 or less.

Community Development Loans

During the evaluation period, CTB made a relatively high level of community development loans in this assessment area. CTB made three loans aggregating \$4,371,080 during 2009 and no loans during 2008. This represents a 108.1% increase in community development lending within this assessment area since the previous evaluation. Two loans totaling \$3,336,993 are for low- and moderate-income services, while the third loan in the amount of \$1,034,087 was to support economic development.

Of the bank’s total community development dollars, 34.8% supported the Nonmetropolitan Central Kentucky #1 assessment area.

Investment Test

CTB made a relatively high level of community development investments within this assessment area. Bank investments total \$4,698,041 for this evaluation period. Of the total, \$3,114,000 was in the form of two investments (certificate of deposits and tax credits).

\$1,584,041 was invested in this assessment area as a result of CTB’s ongoing investment in the CRA Fund Advisors, which invests in affordable housing securitizations (FNMA/GNMA loan pools) comprised of loans to low- and moderate-income borrowers.

Of the bank’s total community development investment dollars, 20.7% supported the Nonmetropolitan Central Kentucky #1 assessment area.

CTB exhibits good responsiveness to credit and community economic development needs through the use of investments.

Service Test

CTB provides a good level of services.

Retail Services

The bank’s delivery systems are accessible to essential all portions of the bank’s assessment area. The bank operates 28 branches, 22 full-service ATMs, and four cash-only ATMs in the Nonmetropolitan Central Kentucky #1 assessment area. When comparing the distribution of branches by census tract income level to the percentage of the population living within each census tract income level, the distribution is accessible in the low- and moderate-income geographies and to borrowers of different income levels. The following table shows the total distribution of CTB’s branches and full-service ATMs compared to families by tract income:

Geography	Number of Branches	Percent	Number of ATMs	Percent	Percent Families by Tract Income	Percent of Population by Tract
Low-income	0	0.0%	0	0.0%	0.3%	1.1%
Moderate-Income	3	10.7%	3	11.5%	10.6%	10.4%
Middle-Income	17	60.7%	15	57.7%	58.7%	57.8%
Upper-Income	8	28.6%	8	30.8%	30.4%	30.8%
Totals	28	1	26	100%	100%	100%

* 63.2% of middle-income tracts are distressed.

No branches or full-service ATMs were opened or closed in this assessment area since the previous examination. The bank's record of opening and closing offices has not adversely affected the accessibility of its services, particularly to moderate-income geographies and low- and moderate-income individuals.

Community Development Services

The institution provides a relatively high level of community development services. Total service hours were 292 which are 25.3% of total service hours during the assessment period. Below are examples of the community development services provided within this assessment area:

- County Chambers of Commerce, Industrial, and Extension programs – These organizations promote economic development opportunities within their communities. CTB had ten employees, including two market presidents that preside on twelve different chambers in seven different counties throughout this assessment area (Bell, Boyle, Green, Laurel, Madison, Mercer, and Rockcastle).
- Financial Literacy – Several employees taught financial literacy to elementary students at various institutions located in distressed middle-income census tracts.

METROPOLITAN AREAS
(full-scope review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN LEXINGTON-FAYETTE, KY
METROPOLITAN AREA**

The Lexington-Fayette, KY Metropolitan Area (MSA) is comprised of the entireties of Bourbon, Clark, Fayette, Jessamine, Scott and Woodford Counties; however, the bank's assessment area only consists of the entireties of Clark, Fayette, Scott, and Woodford. The assessment area is comprised of 81 census tracts, of which there are nine low-income, 15 moderate-income, 34 middle-income, 22 upper-income, and one unknown-income tracts. This assessment area represented 8.0% of CTB's total deposits, 9.7% of home mortgage lending, 19.8% of small business lending, and 8.4% of small farm lending.

According to the Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits¹² as of June 30, 2009, the bank ranks 14th out of 34 institutions within this assessment area with 2.2% of total market deposits. These 34 institutions maintained 198 branches holding \$8.8 billion in deposits. Major banking competitors in the area include Central Bank & Trust Company, JPMorgan Chase Bank, Branch Banking & Trust Company, Traditional Bank, Inc., and Whitaker Bank.

To determine credit needs and opportunities in the assessment area, interviews focusing on economic development and affordable housing were conducted with local organizations. This information was also supplemented with demographic and economic data pertinent to the area. The housing contact indicated that the Lexington housing market has been relatively stable with a good affordability ratio of housing. For low-income borrowers, their housing demands have been met with a stable source of housing stock. The contact specifically mentioned CTB has a financial institution that works extremely well with low- and moderate-income borrowers to obtain housing. Regarding economic development, the contact stated that downtown Lexington is being driven primarily by growth in the medical and educational fields. The University of Kentucky in Lexington is a big driver of the local economic growth.

Population Characteristics

According to 2000 Census data, the population of this assessment area is 349,925 versus the MSA's total population of 408,326. Of the total population, 77.6% are above the age of 18.

12 FDIC Summary of Deposits: www.fdic.gov (June 30, 2007 is the most recent date for which FDIC deposit data is available.)

Income Characteristics

According to the 2000 Census, the median family income for the assessment area is \$52,800. However, in 2010, the median family income increased to \$65,500 in the Lexington-Fayette MSA, which is still significantly above the median family income for Kentucky at \$53,000.

From the income distribution perspective, 19.9% of the families in the assessment area are low-income, 17.1% are moderate-income, 21.5% are middle-income, and 41.4% are upper-income. Families living below the poverty level represent 7.9% of total families in the assessment area, which is less than the percentage of families living below the poverty level in Kentucky at 12.7%.

Housing Characteristics

According to the 2000 Census, the assessment area contains 152,267 housing units, of which 54.9% are owner-occupied, 38.5% are rental units, and 6.5% are vacant units. In low-income tracts, 21.2% are owner-occupied; in moderate-income tracts, 44.7% are owner-occupied; in middle-income tracts, 55.3% are owner-occupied; and in upper-income tracts, 71.4% are owner-occupied. The overall owner-occupancy rate in this assessment area is below Kentucky's at 64.3%.

The percentage of units housing 1-4 families was 75.4%, while 21.3% of the housing units were five families or more and 3.2% were mobile homes. The median age of the housing stock in the assessment area is 26 years, which is slightly lower than Kentucky's at 27 years. Multi-family dwellings are more prevalent in this assessment area due to the large university and young professional population.

As of the 2000 Census, the median housing value in the assessment area was \$108,061. The median housing value in upper-income census tracts (\$158,888) had a disparity with housing values in the low- (\$61,617), moderate- (\$72,426), and middle-income census tracts (\$96,802). According to Sperling's Best Places,¹³ as of 2010, the median home cost was \$158,000 in the city of Lexington, and home appreciation increased by 3.7% in the last year.

Labor, Employment, and Economic Characteristics

Employment in the area is primarily in the health care and social services, professional, and construction sectors. Primary employers include Ashland, Inc., Amazon.com, General Electric, Johnson Controls, Lexmark International, Saint Joseph Health System, Smuckers, Toyota Motor Manufacturing, Trane, United Parcel Post, and the University of Kentucky.

¹³ www.bestplaces.net

Area unemployment rates within the counties of the Lexington-Fayette MSA are generally lower than both the Commonwealth of Kentucky or nationwide. For comparison purposes, area unemployment rates are presented in the table below:

Unadjusted Unemployment	Annual 2009	April 2010
Clark	10.9	9.9
Fayette	7.8	7.7
Scott	9.6	8.9
Woodford	8.2	7.9
Kentucky	10.2	10.5
U.S. (nationwide)	9.5	9.3

The following table indicates the 2010 demographics for this assessment area using data from the 2000 Census:

Combined Demographics Report

Community Trust Bank

Assessment Area(s): Lexington-Fayette MSA 30460

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	9	11.1	4,516	5.1	1,472	32.6	17,768	20.0
Moderate-income	15	18.5	17,059	19.2	2,284	13.4	15,223	17.1
Middle-income	34	42.0	36,792	41.4	2,301	6.3	19,144	21.5
Upper-income	22	27.2	30,561	34.4	972	3.2	36,793	41.4
Unknown-income	1	1.2	0	0.0	0	0.0	0	0.0
Total Assessment Area	81	100.0	88,928	100.0	7,029	7.9	88,928	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	12,673	2,680	3.2	21.1	8,440	66.6	1,553	12.3
Moderate-income	30,746	13,730	16.4	44.7	14,531	47.3	2,485	8.1
Middle-income	64,603	35,744	42.7	55.3	25,268	39.1	3,591	5.6
Upper-income	44,245	31,580	37.7	71.4	10,333	23.4	2,332	5.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	152,267	83,734	100.0	55.0	58,572	38.5	9,961	6.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	2,024	12.0	1,727	11.4	232	17.2	65	15.3
Moderate-income	2,878	17.0	2,548	16.8	254	18.9	76	17.8
Middle-income	6,131	36.2	5,538	36.5	425	31.6	168	39.4
Upper-income	5,858	34.6	5,318	35.1	425	31.6	115	27.0
Unknown-income	34	0.2	22	0.1	10	0.7	2	0.5
Total Assessment Area	16,925	100.0	15,153	100.0	1,346	100.0	426	100.0
Percentage of Total Businesses:				89.5		8.0		2.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	13	1.9	13	2.0	0	0.0	0	0.0
Moderate-income	38	5.6	38	5.7	0	0.0	0	0.0
Middle-income	285	41.7	276	41.4	9	56.3	0	0.0
Upper-income	347	50.8	339	50.9	7	43.8	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	683	100.0	666	100.0	16	100.0	1	100.0
Percentage of Total Farms:				97.5		2.3		0.1

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LEXINGTON-FAYETTE, KY METROPOLITAN AREA

Lending Test

The Lending Test performance for the Lexington-Fayette metropolitan assessment area is good. CTB's performance reflects a good responsiveness to the credit needs of the community, a good geographic distribution of loans in the area, and a good distribution among borrowers of different income levels and businesses of different revenue sizes. The bank made four community development loans, which is considered an adequate level of community development lending.

In reaching a conclusion, the greatest weight was given to the evaluation of refinance loans, followed by small business loans, home purchase loans, and home improvement loans. There were insufficient loans to conduct a meaningful analysis of small farm loans.

Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix C.

Lending Activity

Lending activity is good. Within the assessment area, the bank originated 213 home purchase, 294 refinance, 66 home improvement, 273 small business loans, and 39 small farm loans. This area represents 8% of total deposit share and 9.7% of home mortgage lending along with 19.8% of small business loans and 8.4% of small farm loans.

Geographic Distribution

Recognizing that CTB is a major competitor in this market, the distribution of loans among geographies is good. Refinance lending, which received the greatest weight, is good, while small business lending and home improvement lending is good. Home purchase lending is excellent.

Within the Lexington-Fayette metropolitan assessment area, CTB did not originate small business or small farm loans in five low-income (55.6%), five moderate-income (33.3%), seven middle-income (20.6%), and three upper-income (13.6%) census tracts. There were two low- (22.2%), two moderate- (13.3%), and one middle-income (2.9%) census tracts (3.1%) without a home mortgage loan origination. There was not a loan originated in the unknown-income census tract. The four low- and moderate-income census tracts without a home mortgage loan have a high percentage of rental units (each tract is above 60% rental units).

Home Purchase Loans

The geographic distribution of home purchase loans is excellent.

The percentage of lending (3.8%) in low-income tracts was above the percentage (3.2%) of owner-occupied units in these tracts. 2008 home purchase lending was above aggregate lending. Lending in low-income tracts is excellent.

The percentage of lending (22.1%) in moderate-income tracts was substantially above the percentage (16.4%) of owner-occupied units in these tracts. Additionally, the bank's 2008 lending (23.9%) outperformed peer lending (12.6%) within moderate-income tracts. Home purchase lending within moderate-income tracts is excellent. Lending in middle- and upper-income tracts was below the percentage of owner-occupied units.

Refinance Loans

The geographic distribution of refinance loans is good.

The percentage of lending (1.4%) in low-income tracts was below the percentage (3.2%) of owner-occupied units in these tracts. 2008 refinance lending was below aggregate lending. Lending in low-income tracts is adequate, taking into account the limited opportunity offered within the low-income tracts, as represented by the high vacancy (12.3%) and high rental (66.6%) rates.

Lending in moderate-income tracts at 15.3% was in line with the percentage of owner-occupied housing at 16.4%. For 2008, bank refinance lending was at 20.5% and above peer at 12.8%. When taking into economic conditions and aggregate lending, the performance in moderate-income tracts is excellent. The percentage of lending in middle- and upper-income tracts was above the percentage of owner-occupied units in these tracts.

Home Improvement Loans

The geographic distribution of home improvement loans is good.

The percentage of lending (0.0%) in low-income tracts was below the percentage (3.2%) of owner-occupied units in these tracts. 2008 home purchase lending was below aggregate lending. Lending in low-income tracts is adequate, taking into account the limited opportunity offered within the low-income tracts, as represented by the high vacancy (12.3%) and high rental (66.6%) rates.

Lending in moderate-income tracts at 22.7% was above the percentage of owner-occupied housing at 20.0%. For 2008, bank home improvement lending was at 18.4% and slightly above peer at 17.4%. When taking into economic conditions and competition, the performance in moderate-income tracts is excellent. The percentage of lending in middle-income tracts was above proxy and upper-income tracts were below the proxy for demand.

Small Business Loans

Provided that small business lending is a specifically identified need, the geographic distribution of small business loans is good. Within low-income tracts, the percentage of lending at 5.3% was below the percentage of businesses located in these tracts at 12.0%, but the bank's performance is poor when considering that 2008 lending was also below aggregate lending. Within moderate-income tracts, the percentage of lending at 18.6% was above the percentage of businesses located in these tracts at 17.0%, the bank's performance was excellent.

Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans by borrower income and revenue size of the business is good. Refinance lending and small business lending are good. Home purchase and home improvement lending are excellent.

Home Purchase Loans

Taking into consideration competitive factors and the decline in home sales, the distribution of home purchase loans by borrower income is excellent.

The percentage of lending to low-income borrowers at 19.7% was in line with the percentage of low-income families at 20.0% and CTB's 2008 lending level (18.3%) was above the percentage of lending by peer institutions at 7.6%. Recognizing the level of lending by peer institutions, the percentage of lending to low-income borrowers is excellent.

Lending to moderate-income borrowers was excellent. The percentage of lending to moderate-income borrowers at 21.1% was above the proxy at 17.1% and, during 2008, was slightly below peer institutions. The percentage of lending to middle- and upper-income borrowers was below the percentage of middle- and upper-income families.

Refinance Loans

The distribution of refinance loans by borrower income is good.

The percentage of lending to low-income borrowers at 10.9% was considerably less than the percentage of low-income families (20.0%), but was adequate considering competitive factors. The percentage of lending (13.6%) during 2008 by CTB was above peer institutions (7.5%).

The percentage of lending (17.0%) to moderate-income families was slightly below the percentage of moderate-income families (17.1%) and 2008 lending was also slightly above peer lending, reflecting an excellent performance. Lending to middle- and upper-income borrowers were both above the percentages of these respective families.

Home Improvement Loans

The distribution of home improvement loans by borrower income is excellent.

The percentage of lending to low-income borrowers at 22.7% was above the percentage of low-income families. The percentage of lending (21.1%) during 2008 by CTB was above peer institutions (10.0%). Lending to low-income borrowers is excellent.

The percentage of lending (31.8%) to moderate-income borrowers was substantially above (17.1%) the percentage of moderate-income families and 2008 lending was also above peer lending, reflecting an excellent performance. Lending to middle-income borrowers was above the proxy and lending to upper-income borrowers was below the percentages of these families.

Small Business Loans

The distribution of small business loans between businesses with gross annual revenues of \$1 million or less and those with revenues greater than \$1 million is good. Although 89.5% of the businesses in the assessment area had revenues of \$1 million or less, the bank made 70.2% of its loans to small businesses. However, this level of lending in 2008 (94.5%) was substantially higher than peer institutions, which made 29.3% of their loans to small businesses. The vast majority of loans to small businesses at 64.3% were in amounts of \$100,000 or less.

Community Development Loans

CTB originated four loans during this assessment period within this assessment area totaling \$383,806. During the previous examination, the bank originated no community development loans. Of the total, \$358,891 supported low- and moderate-income individuals and \$24,915 supported economic development. The amount of community development lending within this assessment area represented 3.1% of the total community development loans. CTB made an adequate level of community development loans.

Investment Test

Performance under the Investment Test is considered excellent. Bank investments total \$4,170,101 for this evaluation period.

\$4.0 million was invested in this assessment area as a result of CTB's ongoing investment in the CRA Fund Advisors, which invests in affordable housing securitizations (FNMA/GNMA loan pools) comprised of loans to low- and moderate-income borrowers.

CTB made 20 grants totaling \$200,000 for the FHLB's American Dream Homeownership Challenge, which helped to finance 20 homes in this assessment area.

Of the bank’s total community development investment dollars, 18.4% supported the Lexington-Fayette, KY MSA. CTB exhibits excellent responsiveness to credit and community economic development needs through the use of investments.

Service Test

CTB provided a good level of service within this assessment area.

Retail Services

The bank’s delivery systems are accessible to the geographies and individuals of different income levels in its assessment area. The bank operates ten branches, ten full-service ATMs, and two cash-only ATMs in the Lexington-Fayette MSA. When comparing the distribution of branches by census tract income level to the percentage of the population living within each census tract income level, the distribution is accessible in the low- and moderate-income geographies and to borrowers of different income levels. The following table shows the total distribution of CTB’s branches and full-service ATMs compared to families by tract income:

Geography	Number of Branches	Percent	Number of ATMs	Percent	Percent Families by Tract Income	Percent of Population by Tract
Low-income	1	10.0%	1	8.3%	5.1%	8.4%
Moderate-Income	1	10.0%	2	16.7%	19.2%	20.0%
Middle-Income	4	40.0%	4	33.3%	41.3%	40.0%
Upper-Income	4	40.0%	5	41.7%	34.4%	31.5%
Totals	10	100%	12	100%	100%	100%

No branches or full-service ATMs were opened or closed in this assessment area since the previous examination. The bank’s record of opening and closing offices has not adversely affected the accessibility of its services, particularly to moderate-income geographies and low- and moderate-income individuals.

Community Development Services

A total of 295 hours were directed towards community development services during the assessment period (25.5% of total service hours). CTB is a leader in providing community development services within this assessment area. Below are examples of the services provided:

- Commerce Lexington – This organization seeks to provide small business owners with the information they need to make their business a success in the Bluegrass business community. Services provided include, but are not limited to the following: taking advantage of marketing opportunities in various publications, providing educational and professional development training and opportunities, and creating networking opportunities. Two employees serve on the board.
- REACH (Resources, Education, and Assistance for Community Housing) – This nonprofit organization is committed to making housing more affordable for low- and moderate-income individuals and families to assist them to become first-time homebuyers. Two employees and an executive VP and regional president serve on the board.
- Lexington Chamber of Commerce – This organization promotes economic development opportunities in the area. An employee serves on the board.

NONMETROPOLITAN STATEWIDE AREA
(limited-scope review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMETROPOLITAN
CENTRAL KENTUCKY #2**

The bank's assessment area in the Nonmetropolitan Central Kentucky #2 area is comprised of the entirety of Fleming County. The assessment area is comprised of four census tracts, of which there are no low-income, no moderate-income, three middle-income, and one upper-income tracts.

The total population within the assessment area was 13,792 as of the 2000 Census. According to the U.S. Department of Labor, the 2009 average annual unemployment rate for Fleming County was 12.6% and as of April 2010, the unemployment rate was 12.5%. The 2000 median family income in the assessment area was \$33,439.

As of June 30, 2009, CTB ranked second out of three institutions with a 44.6% market share of deposits in the market, according to the FDIC. This assessment area represented 4.8% of CTB's total deposits. Approximately 3.0% of home mortgage type lending, 5.9% of small business lending, and 66.8% of small farm lending are accounted for within this assessment area.

All of the middle-income census tracts were designated as distressed middle-income census tracts in 2009 due to poverty.

The following table indicates the 2010 demographics for this assessment area using data from the 2000 Census:

Combined Demographics Report

Community Trust Bank

Assessment Area(s): NonMSA Central KY2

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		amilies by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	843	21.3
Moderate-income	0	0.0	0	0.0	0	0.0	717	18.1
Middle-income	3	75.0	3,047	76.9	484	15.9	784	19.8
Upper-income	1	25.0	916	23.1	103	11.2	1,619	40.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	4	100.0	3,963	100.0	587	14.8	3,963	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	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	4,719	3,231	76.4	68.5	846	17.9	642	13.6
Upper-income	1,401	998	23.6	71.2	292	20.8	111	7.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	6,120	4,229	100.0	69.1	1,138	18.6	753	12.3
	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	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	191	42.4	175	44.4	8	20.0	8	47.1
Upper-income	260	57.6	219	55.6	32	80.0	9	52.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	451	100.0	394	100.0	40	100.0	17	100.0
	Percentage of Total Businesses:			87.4		8.9		3.8
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	66	61.1	66	61.1	0	0.0	0	0.0
Upper-income	42	38.9	42	38.9	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	108	100.0	108	100.0	0	0.0	0	0.0
	Percentage of Total Farms:			100.0		0.0		0.0

Lending Test

The lending performance in the Nonmetropolitan Central Kentucky 2 assessment area is consistent with the performance in the Commonwealth of Kentucky. Lending activity is adequate. CTB made loans in all four census tracts. The geographic distribution of loans is not relevant given no low- or moderate-income census tracts. The distribution of loans by borrower income and the revenue size of the business is consistent with the state rating.

The bank made one community development loan totaling \$74,862 in the assessment area. The level of community development lending is considered adequate.

Investment Test

There were no community development investments within the assessment area during the review period. Investment performance for this assessment area is below the performance in the Commonwealth of Kentucky.

Service Test

CTB's performance in the assessment area is consistent with the state rating under the Service Test.

The bank's performance as it relates to community services in this assessment area is consistent with what CTB provides to other assessment areas.

SUMMARY OF AREAS RECEIVING LIMITED SCOPE REVIEW

Assessment Area	Lending Test	Investment Test	Service Test
Nonmetropolitan KY #2	Consistent	Below	Consistent

STATE OF WEST VIRGINIA

CRA RATING FOR WEST VIRGINIA:¹⁴ Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

The major factors supporting this rating include:

- An adequate responsiveness to the credit needs of the community;
- A poor geographic distribution of loans throughout the assessment area;
- An adequate distribution among borrowers of different income levels and businesses of different revenue sizes;
- A poor level of community development lending;
- An adequate level of qualified community development investments and grants;
- An adequate responsiveness to credit and community development needs;
- Retail delivery systems that 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 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;
- Provides a limited level of community development services;

SCOPE OF EXAMINATION

The scope of the examination for the State of West Virginia is consistent with the scope of examination for the institution. The full-scope evaluation of the nonmetropolitan assessment area 1 received greater weight than the limited scope of the nonmetropolitan assessment area 2 and the Charleston MSA assessment area.

¹⁴For 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 STATE OF WEST VIRGINIA

The State of West Virginia is comprised of 55 Counties; however, CTB only operates in three counties, excluding Cabell and Wayne, which were previously reviewed in the multistate metropolitan area. The three counties are analyzed in three separate assessment areas (Charleston WV MSA, West Virginia Nonmetropolitan 1, and West Virginia Nonmetropolitan 2) as described in subsequent sections of this evaluation. The assessment area is comprised of 19 census tracts, of which there are one low-income, seven moderate-income, and 11 middle-income tracts.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF WEST VIRGINIA

Lending Test

The Lending Test for the State of West Virginia is rated "Low Satisfactory." CTB's lending reflected an adequate responsiveness to the credit needs of all three of its West Virginia assessment areas.

Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix C.

Lending Activity

Lending activity within the State of West Virginia is adequate. CTB is not among the major financial institutions serving West Virginia, but still has a moderate presence, ranking 23rd in deposit share with 0.83%. Within the State of West Virginia, CTB originated 113 home purchase, 277 refinance, 146 home improvement, 248 small business, and no small farm loans. Mortgage loans totaled \$46,358,000 and small business lending totaled \$20,770,000. Although deposits within West Virginia constituted 9.7% of the bank's total deposits, 9.1% of home mortgage loans were originated in the State of West Virginia and 14.5% of small business loans were originated in West Virginia.

Geographic and Borrower Distribution

The distribution of loans among geographies is poor in all three West Virginia assessment areas.

The distribution of loans among borrowers of different income levels and businesses of different revenue sizes is adequate in all three West Virginia assessment areas.

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

Community Development Loans

The bank made no community development loans within the State of West Virginia, reflecting a poor level of community development lending.

Investment Test

CTB's performance under the Investment Test within the assessment areas located in the State of West Virginia is rated "Low Satisfactory."

A total of \$1,702,926 (7.5% of total community development investments) in community development investments was allocated to the State of West Virginia. This is slightly below the 8.4% of total deposits received from the state. Of this total, \$1,222,926 was due to an ongoing investment in the CRA Fund Advisors, which invests in affordable housing securitizations (FNMA/GNMA loan pools) comprised of loans to low- and moderate-income borrowers. The additional \$480,000 was in the form of preferred stock to assist an organization in serving low- and moderate-income individuals. Additionally, the \$480,000 preferred stock investment and a \$71,186 CRA Fund investment was the only portion that contributed within the assessment area. This \$551,186 was included in the Charleston MSA assessment.

There were no community development investments made in the nonmetropolitan assessment areas. Provided the limited geographical size of these assessment areas, the high rental/vacancy rate of housing, and high poverty rates within the counties, there are limited investment opportunities.

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

Service Test

CTB's performance in the State of West Virginia under the Service Test is rated "Low Satisfactory." Refer to the individual assessment area discussions under the Service Test for additional information.

Retail Services

The bank's delivery systems are reasonably accessible to the geographies and individuals of different income levels with the assessment area. The bank operates four branches and four full-service ATMs in West Virginia.

The bank's record of opening and closing offices has not adversely affected the accessibility of its services, particularly to low- and moderate-income geographies and individuals.

Community Development Services

Community development services were poor in two of three assessment areas. The institution provided an adequate level of services within the West Virginia Nonmetropolitan Area 1. A total of 51 service hours were provided within this assessment period.

NONMETROPOLITAN STATEWIDE AREAS
(full-scope review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMETROPOLITAN
WEST VIRGINIA 1**

The West Virginia #1 Nonmetropolitan Area is comprised of the entirety of Mingo County. Mingo County, WV is comprised of seven census tracts (four moderate- and three middle-income).

This assessment area represented 2.4% of CTB's total deposits, 3.0% of home mortgage lending and 2.3% of small business lending. According to the Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits¹⁵ as of June 30, 2009, the bank has \$57.7 million in deposits and ranks fourth out of four institutions within this assessment area with 12.4% of total market deposits.

To determine credit needs and opportunities in the assessment area, two interviews focusing on economic development were conducted with local community organizations. This information was also supplemented with demographic and economic data pertinent to the area. Both contacts described the State of West Virginia's reliance primarily on the coal industry. The contacts discussed the lack of diversification within local communities, which results in a strong correlation with the performance of the coal industry. The coal industry is tied to the health of the economy, which, during the recent recession, has had a significant impact on local and state governments and residents. The performance of the coal industry impacts the tax revenues collected and the employment of residents. Both contacts felt that local financial institutions were generally meeting the credit needs of the local businesses.

Population Characteristics

According to 2000 Census data, the population of this assessment area is 28,253. Approximately 75.8% of the population is age 18 years and older.

Income Characteristics

According to the 2000 Census, the median family income for the assessment area was \$26,856.

From the income distribution perspective, 31.2% of the families in the assessment area are low-income, 17.3% are moderate-income, 18.0% are middle-income, and 33.5% are upper-income. Families living below the poverty level represent 25.9% of total families in the assessment area, which is above the percentage of families living below the poverty level in Kentucky at 12.7%.

¹⁵ FDIC Summary of Deposits: www.fdic.gov (June 30, 2007 is the most recent date for which FDIC deposit data is available.)

Housing Characteristics

According to the 2000 Census, the assessment area contains 12,898 housing units, of which 68.2% are owner-occupied, 19.5% are rental units, and 12.4% are vacant units. The assessment area's owner-occupancy rate is slightly higher than the State of West Virginia's at 65.6%. In moderate-income tracts, 71.6% are owner-occupied and in middle-income tracts, 63.5% are owner-occupied.

The percentage of units housing 1-4 families was 61.9%, while 6.4% of housing units are five families or more and 31.6% are mobile homes. The median age of the housing stock in the assessment area is 25 years, which is slightly lower than Kentucky's at 27 years.

As of the 2000 Census, the median housing value in the assessment area was \$50,553.

Labor, Employment, and Economic Characteristics

All three of the middle income census tracts are classified as distressed due to poverty and population loss during both 2008 and 2009.

Employment in Mingo County is primarily comprised of retail, manufacturing, and professional services. Coal mining is still an important part of Mingo County's economy. However, Mingo County is making efforts to diversify its economic outlook. Its industrial park is the home for Mohawk, Inc., Coal Mac, Inc., and Weatherford Fracturing Technologies.

West Virginia's unemployment levels remain higher than nationwide levels in rural areas and unemployment rates remain lower than nationwide in urban areas of West Virginia. For comparison purposes, area unemployment rates are presented in the table below:

Unadjusted Unemployment	Annual 2009	April, 2010
Non-MSA WV 1 Mingo County	9.2%	10.7%
West Virginia	7.9	8.8
U.S. (nationwide)	9.5	9.3

The following table indicates this assessment area's 2010 demographics utilizing data from the 2000 Census:

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	2,586	31.2
Moderate-income	4	57.1	4,936	59.6	1,398	28.3	1,430	17.3
Middle-income	3	42.9	3,349	40.4	748	22.3	1,492	18.0
Upper-income	0	0.0	0	0.0	0	0.0	2,777	33.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7	100.0	8,285	100.0	2,146	25.9	8,285	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	7,390	5,294	60.2	71.6	1,252	16.9	844	11.4
Middle-income	5,508	3,498	39.8	63.5	1,259	22.9	751	13.6
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	12,898	8,792	100.0	68.2	2,511	19.5	1,595	12.4
	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	303	44.0	258	44.0	23	43.4	22	44.9
Middle-income	386	56.0	329	56.0	30	56.6	27	55.1
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	689	100.0	587	100.0	53	100.0	49	100.0
Percentage of Total Businesses:			85.2		7.7		7.1	
	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	7	70.0	6	66.7	1	100.0	0	0.0
Middle-income	3	30.0	3	33.3	0	0.0	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	10	100.0	9	100.0	1	100.0	0	0.0
Percentage of Total Farms:			68		10.0		0.0	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN WEST VIRGINIA 1

Lending Test

The Lending Test performance for the Nonmetropolitan West Virginia 1 assessment area is adequate. CTB's performance reflects an adequate responsiveness to the credit needs of the community, a poor geographic distribution of loans in the area, and an adequate distribution among borrowers. The bank made no community development loans, which is considered a very poor level of community development lending.

In reaching a conclusion, the greatest weight was given to the evaluation of refinance loans, followed by home improvement loans. Although home purchase, small business, and small farm loans were reviewed, no analysis is presented due to the small number of loans.

Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix C.

Lending Activity

Lending activity is adequate. Within the assessment area, the bank originated 35 home purchase, 67 refinance, 73 home improvement, and 37 small business loans.

Geographic Distribution

The distribution of loans among geographies is poor. Refinance and home improvement lending were both poor.

Within the West Virginia 1 nonmetropolitan assessment area, CTB originated a small business or home mortgage type loan in each of the seven census tracts.

Refinance Loans

Lending in moderate-income tracts at 29.9% was below the percentage of owner-occupied housing at 60.2%. For 2008, bank refinance lending was at 33.3% and significantly below peer at 52.9%. Bank lending performance in moderate-income tracts is poor. The percentage of lending in middle-income tracts was above the proxy for demand.

Home Improvement Loans

Lending in moderate-income tracts at 28.8% was below the percentage of owner-occupied housing at 60.2%. For 2008, bank home improvement lending was at 34.2% and significantly below peer at 61.5%. The geographic distribution of home improvement loans is poor. The percentage of lending in middle-income tracts was above proxy.

Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans by borrower income and revenue size of the business is adequate. Refinance lending is considered poor, with home improvement lending as good.

Refinance Loans

The distribution of refinance loans by borrow income is poor.

The percentage of lending to low-income borrowers at 0.0%, was considerably less than the percentage of low-income families (31.2%) and is considered poor. The percentage of lending (0%) during 2008 by CTB was below peer institutions (5.9%).

The percentage of lending (6.0%) to moderate-income borrowers was below the percentage of moderate-income families (17.3%) and 2008 lending was slightly above peer lending, reflecting an adequate performance. Lending to both middle- and upper-income borrowers were both above the percentages of these respective families.

Home Improvement Loans

The distribution of home improvement loans by borrow income is good.

The percentage of lending to low-income borrowers at 11.0% was significantly below the percentage of low-income families. The percentage of lending (13.2%) during 2008 by CTB was above peer institutions (7.7%). Lending to low-income borrowers is adequate.

The percentage of lending (17.8%) to moderate-income borrowers was slightly above (17.3%) the percentage of moderate-income families and 2008 lending was also above peer lending, reflecting an excellent performance. Lending to both middle- and upper-income borrowers were above the percentages of these respective families.

Community Development Loans

CTB originated no community development loans in this assessment area during the time period under review, reflecting a poor level of lending. Provided the limited size of this assessment area, the high rental/vacancy rate of housing, and high poverty rates within the county, there are limited lending opportunities.

Investment Test

CTB funded no community development investments in this assessment area during the time period under review, reflecting a poor level of investing. Provided the limited size of this assessment area, the high rental/vacancy rate of housing, and high poverty rates within the county, there are limited investment opportunities.

Service Test

CTB provided an adequate level of services.

Retail Services

The bank's delivery systems are reasonably accessible to essential all portions of the bank's assessment area. The bank operates one branch and one full-service ATM in the Nonmetropolitan West Virginia 1 area. When comparing the distribution of branches by census tract income level to the percentage of the population living within each census tract income level, the distribution is reasonably accessible in the moderate- and distressed middle-income geographies. The branch located in Mingo County is located in a distressed middle-income tract.

No branches or full-service ATMs were opened or closed in this assessment area since the previous examination. The bank's record of opening and closing offices has not adversely affected the accessibility of its services, particularly to moderate-income geographies and low- and moderate-income individuals.

Community Development Services

The institution provided an adequate level of services. A total of 51 (4.4% of total community development service hours) financial expertise service hours were provided for community development purposes within this assessment area. Services included Chamber of Commerce board involvement and financial literacy education at elementary schools located in distressed middle-income census tracts.

NONMETROPOLITAN STATEWIDE AREAS
(limited-scope review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMETROPOLITAN WEST VIRGINIA 2

The bank's assessment area in the Nonmetropolitan West Virginia 2 area is comprised of the entirety of Nicholas County. The assessment area is comprised of seven census tracts, all of which are middle income.

This assessment area represented 3.9% of CTB's total deposits, 0.56% of home mortgage lending, and 3.5% of small business lending.

According to the Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits¹⁶ as of June 30, 2009, the bank has \$93.4 million in deposits, and ranks second out of five institutions within this assessment area with 23.5% of total market deposits.

Facts and data reviewed, including performance and demographic information, can be found in the core tables accompanying this report.

The following table indicates the 2010 demographics for this assessment area using data from the 2000 Census.

¹⁶ FDIC Summary of Deposits: www.fdic.gov (June 30, 2009 is the most recent date for which FDIC deposit data is available.)

Combined Demographics Report

Community Trust Bank

Assessment Area(s): NonMSA WV2

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	1,562	20.1
Moderate-income	0	0.0	0	0.0	0	0.0	1,412	18.1
Middle-income	7	100.0	7,781	100.0	1,165	15.0	1,707	21.9
Upper-income	0	0.0	0	0.0	0	0.0	3,100	39.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7	100.0	7,781	100.0	1,165	15.0	7,781	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	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	12,406	8,886	100.0	71.6	1,836	14.8	1,684	13.6
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	12,406	8,886	100.0	71.6	1,836	14.8	1,684	13.6
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	795	100.0	697	100.0	65	100.0	33	100.0
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	795	100.0	697	100.0	65	100.0	33	100.0
	Percentage of Total Businesses:			87.7		8.2		4.2
	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	29	100.0	28	100.0	0	0.0	1	100.0
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	29	100.0	28	100.0	0	0.0	1	100.0
	Percentage of Total Farms:			96.6		0.0		3.4

Lending Test

The lending performance in the Nonmetropolitan West Virginia 2 assessment area is consistent with the performance in the State of West Virginia. Lending activity is adequate. CTB made loans in all seven census tracts. Lending was consistent with the State of West Virginia for both geographic and borrower distributions.

The bank made no community development loans within this assessment area.

Investment Test

The bank made no community development investments within this assessment area, which is below the state rating.

Service Test

CTB's performance in the assessment area is consistent with the state rating under the Service Test.

There were no community development services during this review period.

METROPOLITAN STATEWIDE AREA
(limited-scope review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN CHARLESTON, WV
METROPOLITAN AREA**

The bank's assessment area in the Charleston, WV MSA area is comprised of the entirety of Lincoln County. The assessment area is comprised of five census tracts, of which there is one low-income, three moderate-income, and one middle-income tracts.

This assessment area represented 2.1% of CTB's total deposits, 0.53% of home mortgage lending and 0.29% of small business lending.

According to the Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits¹⁷ as of June 30, 2009, the bank ranks 16th out of 23 institutions within this MSA with 0.94% of total market deposits. These 25 institutions maintained 101 branches holding \$5.6 billion in deposits. Major banking competitors in the assessment area are Branch Banking and Trust Co., Huntington National Bank, and United Bank.

Facts and data reviewed, including performance and demographic information, can be found in the core tables accompanying this report.

The following table indicates the 2010 demographics for this assessment area using data from the 2000 Census.

¹⁷ FDIC Summary of Deposits: www.fdic.gov (June 30, 2009 is the most recent date for which FDIC deposit data is available.)

Combined Demographics Report

Community Trust Bank

Assessment Area(s): Charleston MSA 16620

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	20.0	1,102	16.7	358	32.5	2,372	36.0
Moderate-income	3	60.0	3,625	55.0	819	22.6	1,330	20.2
Middle-income	1	20.0	1,858	28.2	323	17.4	1,264	19.2
Upper-income	0	0.0	0	0.0	0	0.0	1,619	24.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5	100.0	6,585	100.0	1,500	22.8	6,585	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,730	1,178	17.2	68.1	300	17.3	252	14.6
Moderate-income	5,361	3,625	53.0	67.6	1,104	20.6	632	11.8
Middle-income	2,755	2,041	29.8	74.1	416	15.1	298	10.8
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	9,846	6,844	100.0	69.5	1,820	18.5	1,182	12.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	48	11.7	45	12.3	0	0.0	3	17.6
Moderate-income	272	66.3	241	65.7	19	73.1	12	70.6
Middle-income	90	22.0	81	22.1	7	26.9	2	11.8
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	410	100.0	367	100.0	26	100.0	17	100.0
	Percentage of Total Businesses:			89.5		6.3		4.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5	20.0	5	20.0	0	0.0	0	0.0
Moderate-income	11	44.0	11	44.0	0	0.0	0	0.0
Middle-income	9	36.0	9	36.0	0	0.0	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	25	100.0	25	100.0	0	0.0	0	0.0
	Percentage of Total Farms:			100.0		0.0		0.0

Lending Test

The lending performance in the Charleston, WV MSA assessment area is consistent with the performance in the State of West Virginia. Lending activity is poor. CTB made loans in all five census tracts. Lending was consistent with the State of West Virginia for both geographic and borrower distributions.

The bank made no community development loans within this assessment area.

Investment Test

\$71,186 was invested in this assessment area as a result of CTB's ongoing investment in the CRA Fund Advisors, which invests in affordable housing securitizations (FNMA/GNMA loan pools) comprised of loans to low- and moderate-income borrowers. Additionally a \$480,000 investment was in the form of preferred stock to assist an organization in serving low- and moderate-income individuals. This \$551,186 represented 2.4% of total community development investments. CTB made an excellent level of community development investments within this assessment area, which is above the state rating.

Service Test

CTB's performance in the assessment area is consistent with the state rating under the Service Test

There were no community development services during this review period.

SUMMARY OF AREAS RECEIVING LIMITED SCOPE REVIEW

Assessment Area	Lending Test	Investment Test	Service Test
Non MSA, WV 2	Consistent	Below	Consistent
Charleston, WV MSA	Consistent	Above	Consistent

APPENDIX A

SCOPE OF EXAMINATION

There is a statutory requirement that the written evaluation of a multistate institution's performance must list the individual branches examined in each state.

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Huntington-Ashland Multistate MSA	Full-Scope review		
Kentucky			
Eastern Kentucky Non-MSA	Full-scope review	Hazard	
Central Kentucky Non-MSA #1	Full-scope review	Frankfort Harrodsburg Danville Lebanon Mt. Vernon London	
Central Kentucky Non-MSA #2	Limited Scope Review		
Lexington-Fayette, KY MSA	Full-Scope Review	Georgetown	
West Virginia			
Charleston, WV MSA	Limited-scope review		
West Virginia Non-MSA #1	Full-scope review	Williamson	
West Virginia Non-MSA #2	Limited-scope review		

APPENDIX B

SUMMARY OF STATE AND MULTISTATE METROPOLITAN AREA RATINGS

State or Multistate Metropolitan Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Kentucky	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
West Virginia	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Huntington-Ashland	Low Satisfactory	Outstanding	Outstanding	Satisfactory

APPENDIX C

BANK AND AGGREGATE LENDING COMPARISON TABLES

Bank and Peer Comparison - HMDA, Small Business & Small Farm
Assessment Area/Group: Charleston MSA 16620

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2008 & 2009)			Peer (2008)		Bank (2008 & 2009)			Peer (2008)	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	9.9%	5.8%	1	33.3%	46.8%	9.9%	5.4%
Moderate	1	33.3%	46.8%	50.5%	44.7%	2	66.7%	53.2%	9.9%	6.9%
Middle	2	66.7%	53.2%	37.6%	46.5%	0	0.0%	0.0%	26.7%	20.5%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	47.5%	65.2%
Unknown	0	0.0%	0.0%	2.0%	3.0%	0	0.0%	0.0%	5.9%	2.0%
Total	3	100.0%	100.0%	100.0%	100.0%	3	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	1	9.1%	18.9%	11.8%	9.7%	1	9.1%	6.1%	5.0%	3.7%
Moderate	5	45.5%	49.1%	53.4%	44.8%	3	27.3%	17.4%	16.8%	10.4%
Middle	5	45.5%	32.0%	34.2%	44.6%	2	18.2%	19.3%	30.4%	26.2%
Upper	0	0.0%	0.0%	0.0%	0.0%	5	45.5%	57.3%	42.2%	51.7%
Unknown	0	0.0%	0.0%	0.6%	0.9%	0	0.0%	0.0%	5.6%	8.0%
Total	11	100.0%	100.0%	100.0%	100.0%	11	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	5	29.4%	19.3%	12.5%	8.7%	6	35.3%	32.1%	22.5%	8.5%
Moderate	6	35.3%	34.9%	67.5%	39.8%	3	17.6%	23.9%	25.0%	5.9%
Middle	6	35.3%	45.9%	20.0%	51.5%	6	35.3%	35.8%	12.5%	16.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	11.8%	8.3%	37.5%	63.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.5%	5.8%
Total	17	100.0%	100.0%	100.0%	100.0%	17	100.0%	100.0%	100.0%	100.0%
	HMDA Totals									
Low	6	19.4%	17.4%	11.2%	8.1%	8	25.8%	11.4%	8.9%	4.6%
Moderate	12	38.7%	47.9%	54.5%	44.7%	8	25.8%	20.9%	15.5%	8.7%
Middle	13	41.9%	34.8%	33.3%	45.6%	8	25.8%	18.9%	26.7%	23.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	7	22.6%	48.8%	43.2%	57.5%
Unknown	0	0.0%	0.0%	1.0%	1.7%	0	0.0%	0.0%	5.6%	5.7%
Total	31	100.0%	100.0%	100.0%	100.0%	31	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS					SMALL FARM				
	By Tract Income									
Low	0	0.0%	0.0%	6.8%	2.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	20.0%	27.6%	46.6%	35.1%	0	0.0%	0.0%	100.0%	100.0%
Middle	4	80.0%	72.4%	34.7%	58.1%	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%
Total	5	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
	By Revenue									
\$1 Million or Less	2	40.0%	46.2%	25.6%	42.5%	0	0.0%	0.0%	66.7%	91.2%
	By Loan Size									
\$100,000 or less	5	100.0%	100.0%	96.8%	54.7%	0	0.0%	0.0%	100.0%	100.0%
\$100,001-\$250,000	0	0.0%	0.0%	1.4%	9.4%	0	0.0%	0.0%	0.0%	0.0%
\$250,001-\$1 Million-\$500k (Farm)	0	0.0%	0.0%	1.8%	35.9%	0	0.0%	0.0%	0.0%	0.0%
Total	5	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%

Bank and Peer Comparison - HMDA, Small Business & Small Farm

Assessment Area/Group: Huntington-Ashland MSA 26580

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2008 & 2009)			Peer (2008)		Bank (2008 & 2009)			Peer (2008)	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	1.2%	1.7%	4	5.8%	1.6%	6.8%	3.4%
Moderate	9	13.0%	11.4%	10.6%	6.4%	8	11.6%	5.5%	18.3%	12.1%
Middle	27	39.1%	21.7%	48.0%	46.1%	11	15.9%	10.1%	24.9%	21.1%
Upper	33	47.8%	66.9%	40.2%	45.8%	44	63.8%	82.4%	43.5%	57.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	2.9%	0.3%	6.4%	6.1%
Total	69	100.0%	100.0%	100.0%	100.0%	69	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	0	0.0%	0.0%	0.3%	0.2%	3	1.6%	0.9%	6.6%	3.4%
Moderate	16	8.7%	7.8%	6.9%	5.5%	21	11.4%	5.0%	13.1%	8.5%
Middle	60	32.6%	28.4%	53.1%	49.3%	49	26.6%	21.5%	22.2%	18.1%
Upper	108	58.7%	63.7%	39.7%	45.1%	111	60.3%	72.6%	48.6%	59.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	9.5%	10.1%
Total	184	100.0%	100.0%	100.0%	100.0%	184	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	0	0.0%	0.0%	0.2%	0.1%	7	15.9%	4.3%	8.6%	4.1%
Moderate	16	36.4%	19.3%	9.1%	7.0%	8	18.2%	6.9%	19.4%	11.9%
Middle	16	36.4%	66.6%	58.5%	57.4%	6	13.6%	11.4%	22.1%	17.3%
Upper	12	27.3%	14.1%	32.2%	35.5%	23	52.3%	77.3%	47.0%	63.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.9%	2.9%
Total	44	100.0%	100.0%	100.0%	100.0%	44	100.0%	100.0%	100.0%	100.0%
	HMDA Totals									
Low	0	0.0%	0.0%	0.8%	2.1%	14	4.7%	1.1%	6.8%	3.2%
Moderate	41	13.8%	9.0%	8.7%	6.0%	37	12.5%	5.2%	15.7%	9.7%
Middle	103	34.7%	27.2%	51.3%	46.6%	66	22.2%	18.2%	23.1%	18.3%
Upper	153	51.5%	63.8%	39.2%	45.3%	178	59.9%	75.4%	45.9%	55.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	0.7%	0.1%	8.4%	12.8%
Total	297	100.0%	100.0%	100.0%	100.0%	297	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS					SMALL FARM				
	By Tract Income									
Low	3	2.0%	7.0%	9.1%	12.3%	0	0.0%	0.0%	7.7%	5.1%
Moderate	17	11.6%	6.3%	13.3%	18.2%	0	0.0%	0.0%	7.7%	27.7%
Middle	88	59.9%	52.3%	40.6%	40.7%	0	0.0%	0.0%	38.5%	22.6%
Upper	39	26.5%	34.4%	31.2%	26.9%	0	0.0%	0.0%	30.8%	43.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	147	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
	By Revenue									
\$1 Million or Less	72	49.0%	48.8%	29.5%	39.5%	0	0.0%	0.0%	84.6%	93.4%
	By Loan Size									
\$100,000 or less	114	77.6%	28.5%	94.0%	36.7%	0	0.0%	0.0%	100.0%	100.0%
\$100,001-\$250,000	18	12.2%	21.5%	3.6%	20.5%	0	0.0%	0.0%	0.0%	0.0%
\$250,001-\$1 Million-\$500k (Farm)	15	10.2%	50.0%	2.4%	42.8%	0	0.0%	0.0%	0.0%	0.0%
Total	147	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%

Bank and Peer Comparison - HMDA, Small Business & Small Farm

Assessment Area/Group: Lexington-Fayette MSA 30460

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2008 & 2009)			Peer (2008)		Bank (2008 & 2009)			Peer (2008)	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	8	3.8%	7.2%	3.1%	2.9%	42	19.7%	13.4%	7.6%	4.5%
Moderate	47	22.1%	16.5%	12.6%	8.9%	45	21.1%	16.5%	22.1%	17.0%
Middle	86	40.4%	35.4%	34.2%	30.1%	36	16.9%	13.1%	24.8%	23.3%
Upper	72	33.8%	40.9%	50.1%	58.1%	64	30.0%	46.0%	34.1%	43.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	26	12.2%	11.0%	11.4%	11.7%
Total	213	100.0%	100.0%	100.0%	100.0%	213	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	4	1.4%	1.7%	2.3%	2.3%	32	10.9%	8.5%	7.5%	3.9%
Moderate	45	15.3%	11.8%	12.8%	9.1%	50	17.0%	11.7%	17.2%	11.9%
Middle	102	34.7%	28.8%	37.2%	31.9%	66	22.4%	17.5%	23.2%	19.9%
Upper	143	48.6%	57.6%	47.7%	56.6%	125	42.5%	54.6%	39.0%	48.3%
Unknown	0	0.0%	0.0%	0.0%	0.1%	21	7.1%	7.7%	13.1%	16.0%
Total	294	100.0%	100.0%	100.0%	100.0%	294	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	0	0.0%	0.0%	3.5%	3.3%	15	22.7%	9.0%	10.0%	3.2%
Moderate	15	22.7%	25.0%	17.4%	11.5%	21	31.8%	21.5%	18.1%	12.8%
Middle	27	40.9%	23.5%	37.8%	29.5%	17	25.8%	12.7%	25.3%	20.9%
Upper	24	36.4%	51.5%	41.3%	55.7%	12	18.2%	35.4%	41.7%	53.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.5%	21.3%	4.8%	9.4%
Total	66	100.0%	100.0%	100.0%	100.0%	66	100.0%	100.0%	100.0%	100.0%
	HMDA Totals									
Low	12	2.1%	3.6%	2.8%	2.8%	89	15.5%	10.3%	7.7%	3.9%
Moderate	107	18.7%	13.8%	13.0%	12.0%	116	20.2%	13.6%	19.5%	13.5%
Middle	215	37.5%	31.0%	35.8%	30.1%	119	20.8%	15.8%	23.9%	20.2%
Upper	239	41.7%	51.6%	48.3%	55.0%	201	35.1%	51.1%	36.6%	43.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	48	8.4%	9.2%	12.4%	19.1%
Total	573	100.0%	100.0%	100.0%	100.0%	573	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS					SMALL FARM				
	By Tract Income									
Low	12	4.4%	4.5%	9.3%	14.7%	0	0.0%	0.0%	2.6%	2.7%
Moderate	59	21.6%	16.2%	14.3%	13.2%	4	16.0%	8.6%	5.6%	2.7%
Middle	87	31.9%	40.0%	33.1%	29.3%	13	52.0%	31.1%	49.0%	50.1%
Upper	115	42.1%	39.2%	41.6%	42.2%	8	32.0%	60.2%	41.3%	44.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	273	100.0%	100.0%	100.0%	100.0%	25	100.0%	100.0%	100.0%	100.0%
	By Revenue									
\$1 Million or Less	199	72.9%	65.4%	29.3%	43.2%	16	64.0%	49.2%	70.1%	62.0%
	By Loan Size									
\$100,000 or less	195	71.4%	23.8%	93.3%	31.3%	21	84.0%	32.2%	66.9%	19.0%
\$100,001-\$250,000	47	17.2%	29.4%	3.2%	17.0%	2	8.0%	18.6%	20.8%	34.5%
\$250,001-\$1 Million-\$500k (Farm)	31	11.4%	46.8%	3.4%	51.7%	2	8.0%	49.2%	12.3%	46.5%
Total	273	100.0%	100.0%	100.0%	100.0%	25	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison - HMDA, Small Business & Small Farm

Assessment Area/Group: NonMSA Central KY1

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2008 & 2009)		Peer (2008)			Bank (2008 & 2009)		Peer (2008)		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	1	0.2%	0.2%	0.1%	0.1%	22	5.2%	3.4%	3.9%	1.6%
Moderate	37	8.7%	6.2%	6.5%	5.0%	69	16.2%	8.7%	12.7%	7.9%
Middle	274	64.5%	57.8%	52.9%	45.8%	103	24.2%	17.4%	22.9%	18.2%
Upper	113	26.6%	35.8%	40.1%	48.6%	202	47.5%	64.1%	50.5%	61.6%
Unknown	0	0.0%	0.0%	0.4%	0.5%	29	6.8%	6.4%	10.1%	10.6%
Total	425	100.0%	100.0%	100.0%	100.0%	425	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	3	0.3%	0.2%	0.0%	0.0%	65	6.1%	3.1%	4.2%	1.6%
Moderate	132	12.3%	10.3%	5.6%	3.9%	122	11.4%	7.9%	13.6%	7.5%
Middle	699	65.3%	63.1%	54.7%	50.7%	234	21.8%	18.1%	22.4%	18.2%
Upper	237	22.1%	26.4%	38.9%	44.4%	642	59.9%	70.1%	51.5%	62.5%
Unknown	0	0.0%	0.0%	0.8%	0.9%	8	0.7%	0.7%	8.4%	10.2%
Total	1,071	100.0%	100.0%	100.0%	100.0%	1,071	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	0	0.0%	0.0%	0.2%	0.0%	72	22.9%	7.4%	11.5%	3.9%
Moderate	88	28.0%	17.6%	9.2%	6.4%	52	16.6%	14.2%	14.3%	8.8%
Middle	187	59.6%	65.6%	63.1%	62.1%	77	24.5%	22.4%	21.2%	21.2%
Upper	39	12.4%	16.9%	27.2%	31.5%	109	34.7%	52.5%	47.7%	58.2%
Unknown	0	0.0%	0.0%	0.4%	0.0%	4	1.3%	3.5%	5.3%	8.0%
Total	314	100.0%	100.0%	100.0%	100.0%	314	100.0%	100.0%	100.0%	100.0%
	HMDA Totals									
Low	4	0.2%	0.2%	0.1%	0.0%	159	8.8%	3.4%	4.8%	1.6%
Moderate	257	14.2%	9.5%	6.2%	4.3%	243	13.4%	8.4%	13.3%	7.5%
Middle	1,160	64.1%	61.7%	54.8%	48.6%	414	22.9%	18.1%	22.4%	17.8%
Upper	389	21.5%	28.6%	38.2%	46.4%	953	52.7%	67.6%	50.5%	60.1%
Unknown	0	0.0%	0.0%	0.6%	0.7%	41	2.3%	2.4%	9.1%	13.0%
Total	1,810	100.0%	100.0%	100.0%	100.0%	1,810	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS					SMALL FARM				
	By Tract Income									
Low	0	0.0%	0.0%	0.1%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	25	7.4%	12.7%	5.0%	5.1%	1	1.4%	0.3%	2.3%	0.8%
Middle	192	56.5%	57.0%	51.5%	47.0%	48	67.6%	76.6%	41.3%	38.4%
Upper	123	36.2%	30.3%	37.9%	45.7%	22	31.0%	23.0%	53.7%	60.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	340	100.0%	100.0%	100.0%	100.0%	71	100.0%	100.0%	100.0%	100.0%
	By Revenue									
\$1 Million or Less	261	76.8%	70.8%	32.5%	49.4%	64	90.1%	81.2%	86.8%	87.6%
	By Loan Size									
\$100,000 or less	256	75.3%	26.1%	96.7%	43.8%	61	85.9%	49.9%	92.7%	48.5%
\$100,001-\$250,000	55	16.2%	29.9%	1.6%	12.9%	8	11.3%	33.3%	5.9%	33.9%
\$250,001-\$1 Million-\$500k (Farm)	29	8.5%	44.0%	1.7%	43.3%	2	2.8%	16.8%	1.4%	17.6%
Total	340	100.0%	100.0%	100.0%	100.0%	71	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison - HMDA, Small Business & Small Farm

Assessment Area/Group: NonMSA Central KY2

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2008 & 2009)		Peer (2008)			Bank (2008 & 2009)		Peer (2008)		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	6	13.3%	7.9%	10.2%	4.4%
Moderate	0	0.0%	0.0%	0.0%	0.0%	5	11.1%	4.7%	12.2%	8.4%
Middle	37	82.2%	79.6%	73.5%	78.7%	8	17.8%	18.0%	32.7%	28.6%
Upper	8	17.8%	20.4%	26.5%	21.3%	25	55.6%	65.8%	44.9%	58.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	2.2%	3.6%	0.0%	0.0%
Total	45	100.0%	100.0%	100.0%	100.0%	45	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	8	9.3%	3.5%	4.9%	2.5%
Moderate	0	0.0%	0.0%	0.0%	0.0%	12	14.0%	9.7%	9.7%	6.9%
Middle	73	84.9%	82.1%	72.8%	73.6%	14	16.3%	13.2%	24.3%	19.2%
Upper	13	15.1%	17.9%	27.2%	26.4%	52	60.5%	73.6%	55.3%	66.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.8%	5.1%
Total	86	100.0%	100.0%	100.0%	100.0%	86	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	8	17.0%	3.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	6	12.8%	9.8%	13.0%	15.7%
Middle	34	72.3%	66.0%	82.6%	77.7%	9	19.1%	25.9%	21.7%	9.3%
Upper	13	27.7%	34.0%	17.4%	22.3%	24	51.1%	61.3%	65.2%	75.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	47	100.0%	100.0%	100.0%	100.0%	47	100.0%	100.0%	100.0%	100.0%
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	22	12.4%	4.6%	5.7%	2.9%
Moderate	0	0.0%	0.0%	0.0%	0.0%	23	12.9%	8.4%	10.9%	7.7%
Middle	144	80.9%	80.2%	74.3%	75.2%	31	17.4%	15.4%	26.3%	21.3%
Upper	34	19.1%	19.8%	25.7%	24.8%	101	56.7%	70.6%	53.7%	64.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.6%	1.0%	3.4%	3.4%
Total	178	100.0%	100.0%	100.0%	100.0%	178	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS					SMALL FARM				
	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%
Middle	50	53.8%	45.7%	55.9%	64.0%	157	78.9%	70.9%	62.2%	67.0%
Upper	43	46.2%	54.3%	37.4%	31.4%	42	21.1%	29.1%	32.4%	31.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	93	100.0%	100.0%	100.0%	100.0%	199	100.0%	100.0%	100.0%	100.0%
	By Revenue									
\$1 Million or Less	78	83.9%	79.7%	39.5%	68.1%	171	85.9%	92.1%	97.3%	99.9%
	By Loan Size									
\$100,000 or less	84	90.3%	53.5%	97.5%	59.3%	197	99.0%	92.4%	81.1%	31.6%
\$100,001-\$250,000	6	6.5%	21.2%	1.8%	23.1%	2	1.0%	7.6%	18.9%	68.4%
\$250,001-\$1 Million-\$500k (Farm)	3	3.2%	25.3%	0.7%	17.6%	0	0.0%	0.0%	0.0%	0.0%
Total	93	100.0%	100.0%	100.0%	100.0%	199	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison - HMDA, Small Business & Small Farm

Assessment Area/Group: NonMSA Eastern KY

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2008 & 2009)			Peer (2008)		Bank (2008 & 2009)			Peer (2008)	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	21	3.7%	1.5%	5.0%	1.9%
Moderate	162	28.8%	25.8%	22.0%	18.5%	76	13.5%	7.1%	12.3%	6.7%
Middle	335	59.6%	56.6%	70.4%	71.2%	120	21.4%	13.3%	25.0%	18.6%
Upper	65	11.6%	17.6%	7.7%	10.3%	337	60.0%	76.4%	51.1%	64.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	1.4%	1.7%	6.6%	8.0%
Total	562	100.0%	100.0%	100.0%	100.0%	562	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	41	3.1%	1.3%	6.3%	2.5%
Moderate	371	28.2%	24.6%	24.8%	21.8%	90	6.8%	3.6%	15.3%	10.0%
Middle	781	59.4%	58.9%	67.8%	67.2%	259	19.7%	13.1%	19.5%	15.8%
Upper	163	12.4%	16.5%	7.1%	10.7%	921	70.0%	81.2%	51.7%	62.4%
Unknown	0	0.0%	0.0%	0.3%	0.2%	4	0.3%	0.7%	7.2%	9.4%
Total	1,315	100.0%	100.0%	100.0%	100.0%	1,315	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	130	14.2%	5.8%	11.7%	4.8%
Moderate	317	34.5%	33.9%	27.4%	23.9%	156	17.0%	10.3%	16.6%	11.0%
Middle	543	59.2%	59.8%	70.6%	71.8%	229	24.9%	15.9%	22.2%	16.1%
Upper	58	6.3%	6.3%	2.0%	4.3%	401	43.7%	67.8%	46.9%	63.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	0.2%	0.2%	2.6%	5.1%
Total	918	100.0%	100.0%	100.0%	100.0%	918	100.0%	100.0%	100.0%	100.0%
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	192	6.9%	1.7%	6.8%	2.4%
Moderate	850	30.4%	25.6%	24.4%	21.0%	322	11.5%	5.0%	14.6%	8.9%
Middle	1,659	59.4%	58.4%	69.0%	68.7%	608	21.8%	13.4%	21.6%	16.7%
Upper	286	10.2%	16.1%	6.4%	10.2%	1,659	59.4%	79.0%	50.7%	63.0%
Unknown	0	0.0%	0.0%	0.1%	0.1%	14	0.5%	0.9%	6.3%	8.9%
Total	2,795	100.0%	100.0%	100.0%	100.0%	2,795	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS					SMALL FARM				
	By Tract Income									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	157	27.8%	27.6%	25.2%	23.4%	1	33.3%	4.1%	6.3%	1.7%
Middle	329	58.2%	54.3%	56.9%	60.3%	2	66.7%	95.9%	81.3%	94.9%
Upper	79	14.0%	18.1%	8.7%	13.0%	0	0.0%	0.0%	6.3%	3.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	565	100.0%	100.0%	100.0%	100.0%	3	100.0%	100.0%	100.0%	100.0%
	By Revenue									
\$1 Million or Less	385	68.1%	62.9%	34.4%	44.9%	2	66.7%	11.2%	62.5%	74.6%
	By Loan Size									
\$100,000 or less	446	78.9%	34.1%	95.8%	45.4%	2	66.7%	11.2%	87.5%	19.8%
\$100,001-\$250,000	73	12.9%	24.9%	2.5%	18.5%	1	33.3%	88.8%	6.3%	22.1%
\$250,001-\$1 Million-\$500k (Farm)	46	8.1%	40.9%	1.7%	36.1%	0	0.0%	0.0%	6.3%	58.1%
Total	565	100.0%	100.0%	100.0%	100.0%	3	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison - HMDA, Small Business & Small Farm

Assessment Area/Group: NonMSA WV1

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2008 & 2009)			Peer (2008)		Bank (2008 & 2009)			Peer (2008)	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	1	2.9%	0.4%	0.0%	0.0%
Moderate	12	34.3%	35.5%	58.3%	51.7%	2	5.7%	2.7%	14.6%	7.2%
Middle	23	65.7%	64.5%	41.7%	48.3%	11	31.4%	25.6%	18.8%	21.6%
Upper	0	0.0%	0.0%	0.0%	0.0%	21	60.0%	71.3%	54.2%	59.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.5%	11.6%
Total	35	100.0%	100.0%	100.0%	100.0%	35	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.9%	2.6%
Moderate	20	29.9%	29.9%	52.9%	48.7%	4	6.0%	4.0%	10.6%	7.2%
Middle	47	70.1%	70.1%	47.1%	51.3%	17	25.4%	23.9%	27.1%	24.6%
Upper	0	0.0%	0.0%	0.0%	0.0%	46	68.7%	72.1%	51.8%	62.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.7%	2.8%
Total	67	100.0%	100.0%	100.0%	100.0%	67	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	8	11.0%	1.6%	7.7%	13.4%
Moderate	21	28.8%	29.7%	61.5%	27.0%	13	17.8%	11.9%	3.8%	4.7%
Middle	52	71.2%	70.3%	30.8%	61.4%	21	28.8%	26.8%	30.8%	30.1%
Upper	0	0.0%	0.0%	0.0%	0.0%	31	42.5%	59.7%	57.7%	51.8%
Unknown	0	0.0%	0.0%	7.7%	11.6%	0	0.0%	0.0%	0.0%	0.0%
Total	73	100.0%	100.0%	100.0%	100.0%	73	100.0%	100.0%	100.0%	100.0%
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	9	5.1%	0.3%	4.4%	2.4%
Moderate	53	30.3%	31.4%	55.6%	48.0%	19	10.9%	4.8%	10.6%	7.0%
Middle	122	69.7%	68.6%	43.1%	51.3%	49	28.0%	24.8%	25.0%	23.8%
Upper	0	0.0%	0.0%	0.0%	0.0%	98	56.0%	70.1%	53.1%	60.7%
Unknown	0	0.0%	0.0%	1.3%	0.7%	0	0.0%	0.0%	6.9%	6.1%
Total	175	100.0%	100.0%	100.0%	100.0%	175	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS					SMALL FARM				
	By Tract Income									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	13	35.1%	32.6%	46.3%	79.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	24	64.9%	67.4%	33.2%	17.0%	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%
Total	37	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
	By Revenue									
\$1 Million or Less	24	64.9%	57.1%	30.9%	53.5%	0	0.0%	0.0%	0.0%	0.0%
	By Loan Size									
\$100,000 or less	31	83.8%	49.1%	90.9%	28.3%	0	0.0%	0.0%	0.0%	0.0%
\$100,001-\$250,000	4	10.8%	22.7%	3.9%	14.4%	0	0.0%	0.0%	0.0%	0.0%
\$250,001-\$1 Million-\$500k (Farm)	2	5.4%	28.2%	5.2%	57.2%	0	0.0%	0.0%	0.0%	0.0%
Total	37	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%

Bank and Peer Comparison - HMDA, Small Business & Small Farm

Assessment Area/Group: NonMSA WV2

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2008 & 2009)			Peer (2008)		Bank (2008 & 2009)			Peer (2008)	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	1	16.7%	17.6%	2.6%	1.2%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.8%	7.3%
Middle	6	100.0%	100.0%	98.0%	97.3%	3	50.0%	52.5%	28.6%	20.8%
Upper	0	0.0%	0.0%	0.0%	0.0%	1	16.7%	9.5%	52.0%	65.6%
Unknown	0	0.0%	0.0%	2.0%	2.7%	1	16.7%	20.4%	3.1%	5.1%
Total	6	100.0%	100.0%	100.0%	100.0%	6	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	1	6.7%	4.9%	5.1%	2.2%
Moderate	0	0.0%	0.0%	0.0%	0.0%	4	26.7%	9.8%	10.3%	5.3%
Middle	15	100.0%	100.0%	99.3%	99.5%	2	13.3%	7.2%	20.2%	15.1%
Upper	0	0.0%	0.0%	0.0%	0.0%	8	53.3%	78.1%	56.6%	68.1%
Unknown	0	0.0%	0.0%	0.7%	0.5%	0	0.0%	0.0%	7.7%	9.4%
Total	15	100.0%	100.0%	100.0%	100.0%	15	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	9.0%	4.7%
Moderate	0	0.0%	0.0%	0.0%	0.0%	2	16.7%	5.1%	14.0%	6.4%
Middle	12	100.0%	100.0%	99.0%	98.5%	4	33.3%	44.5%	27.0%	19.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	6	50.0%	50.4%	48.0%	67.1%
Unknown	0	0.0%	0.0%	1.0%	1.5%	0	0.0%	0.0%	2.0%	2.4%
Total	12	100.0%	100.0%	100.0%	100.0%	12	100.0%	100.0%	100.0%	100.0%
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	2	6.1%	5.1%	4.9%	2.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	6	18.2%	7.5%	12.1%	6.1%
Middle	33	100.0%	100.0%	98.8%	98.7%	9	27.3%	22.0%	24.3%	17.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	15	45.5%	63.1%	53.5%	67.1%
Unknown	0	0.0%	0.0%	1.2%	1.3%	1	3.0%	2.3%	5.1%	7.4%
Total	33	100.0%	100.0%	100.0%	100.0%	33	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS					SMALL FARM				
	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%
Middle	59	100.0%	100.0%	91.4%	98.2%	0	0.0%	0.0%	85.7%	98.4%
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%
Total	59	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
	By Revenue									
\$1 Million or Less	34	57.6%	42.5%	36.5%	52.8%	0	0.0%	0.0%	78.6%	91.7%
	By Loan Size									
\$100,000 or less	53	89.8%	54.8%	94.6%	46.6%	0	0.0%	0.0%	82.1%	39.0%
\$100,001-\$250,000	4	6.8%	22.3%	3.6%	20.2%	0	0.0%	0.0%	17.9%	61.0%
\$250,001-\$1 Million-\$500k (Farm)	2	3.4%	22.9%	1.9%	33.3%	0	0.0%	0.0%	0.0%	0.0%
Total	59	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%

APPENDIX D

GLOSSARY

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

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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

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

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

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

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

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

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

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

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

Middle-income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

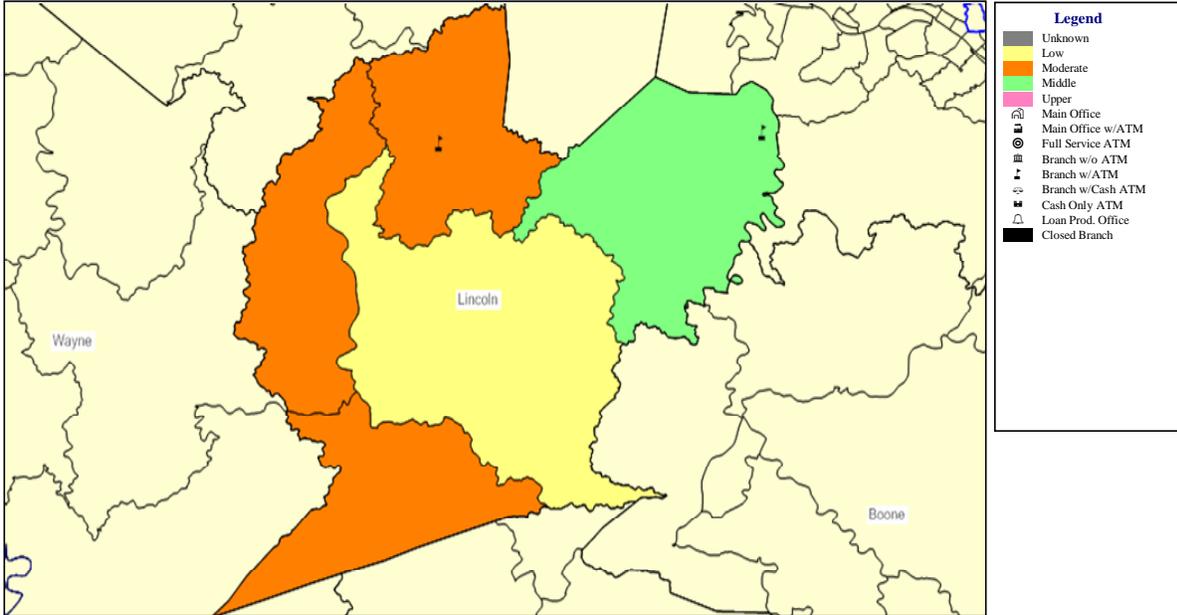
Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Upper-income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

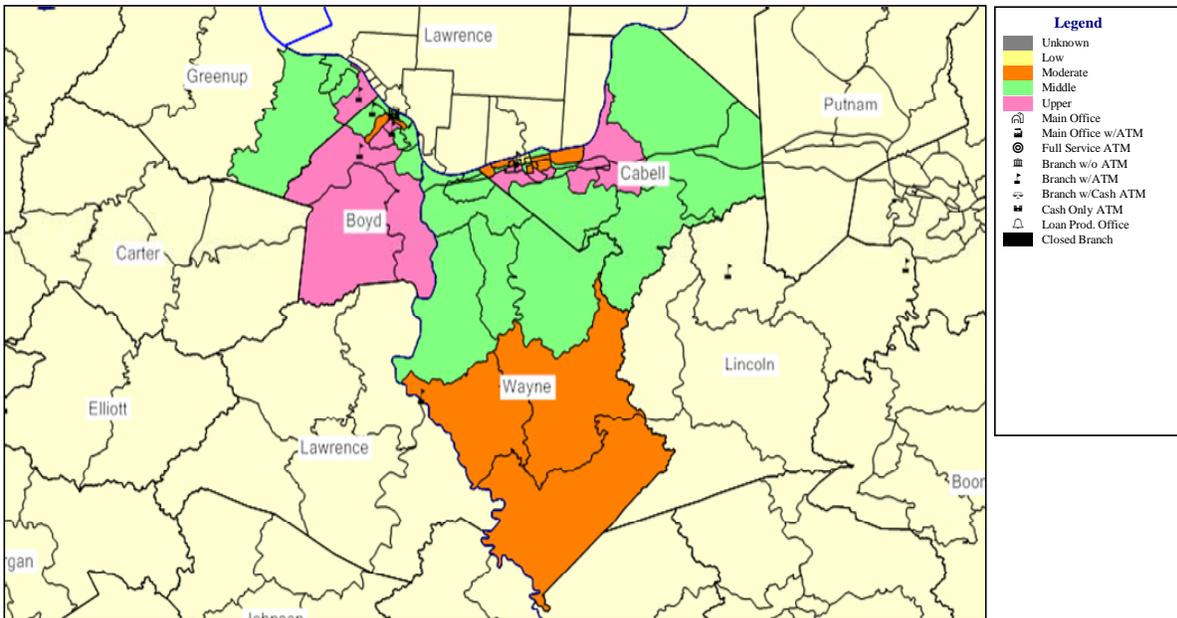
APPENDIX E

ASSESSMENT AREA MAPS

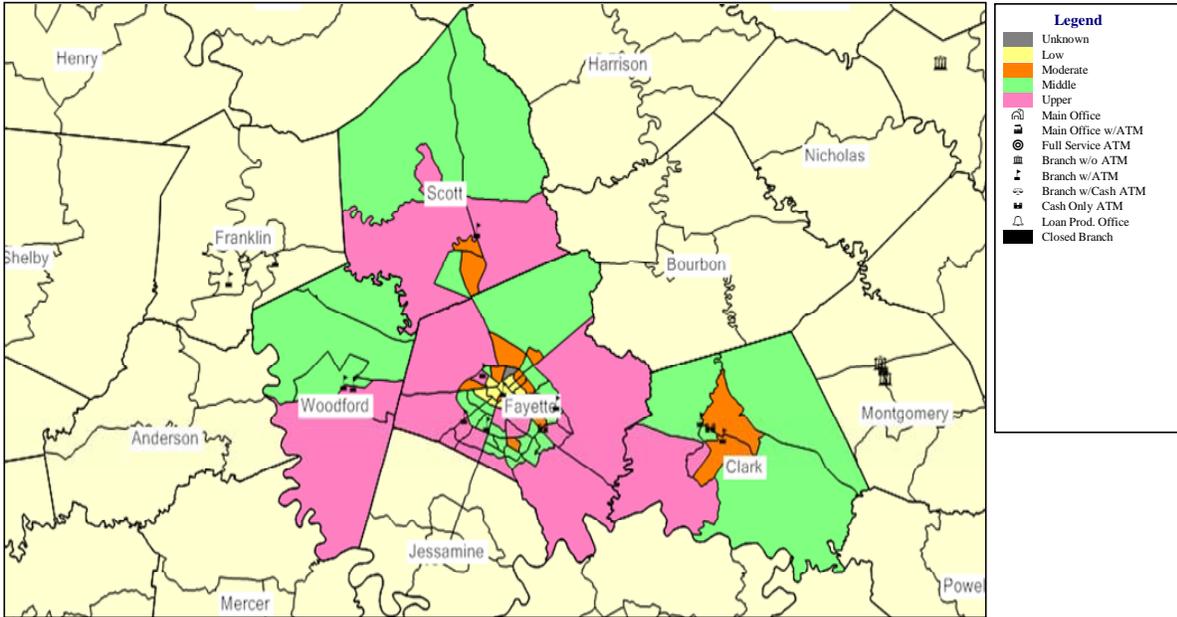
Community Trust Bank
Assessment Area: Charleston MSA 16620



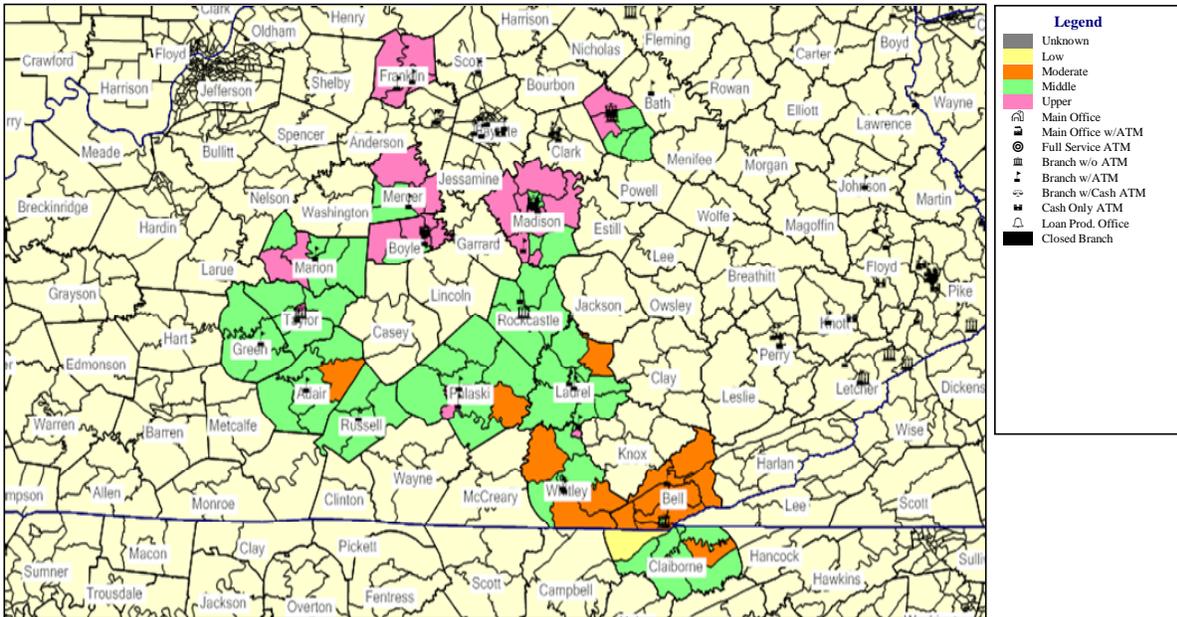
Community Trust Bank
Assessment Area: Huntington-Ashland MSA 26580



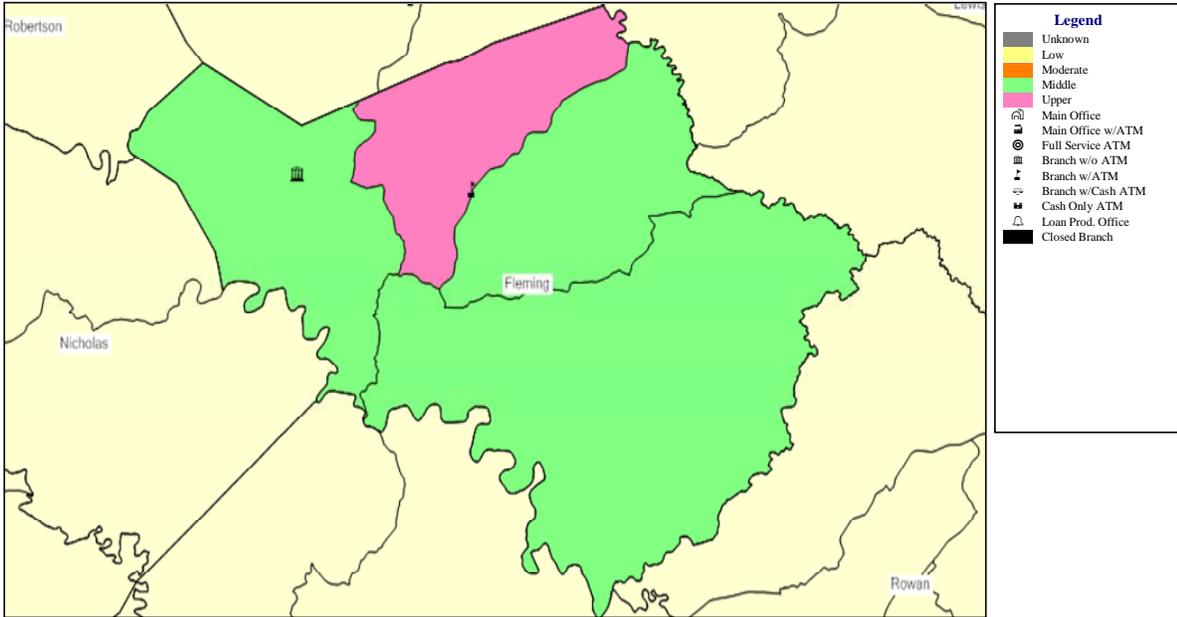
Community Trust Bank
 Assessment Area: Lexington-Fayette MSA 30460



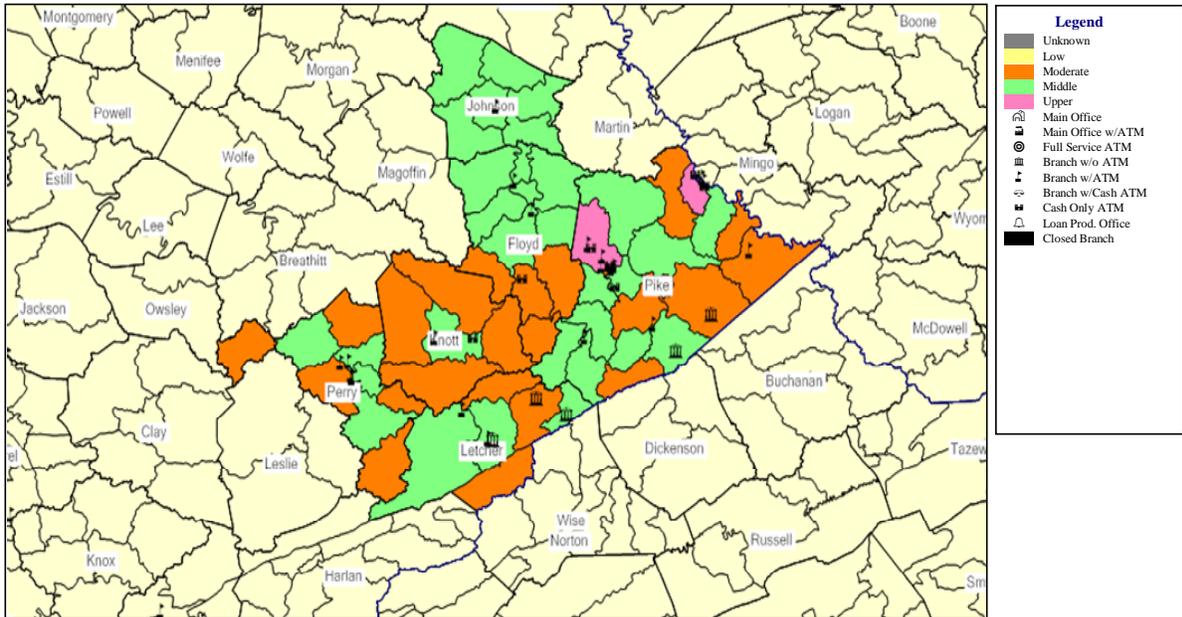
Community Trust Bank
 Assessment Area: NonMSA Central KY1



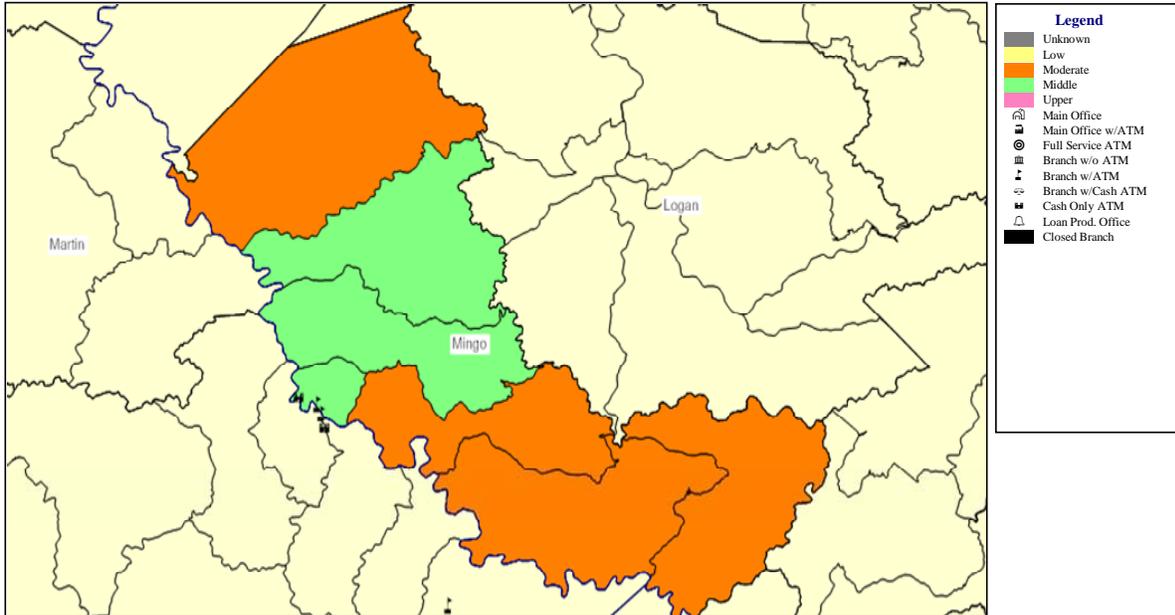
Community Trust Bank
 Assessment Area: NonMSA Central KY2



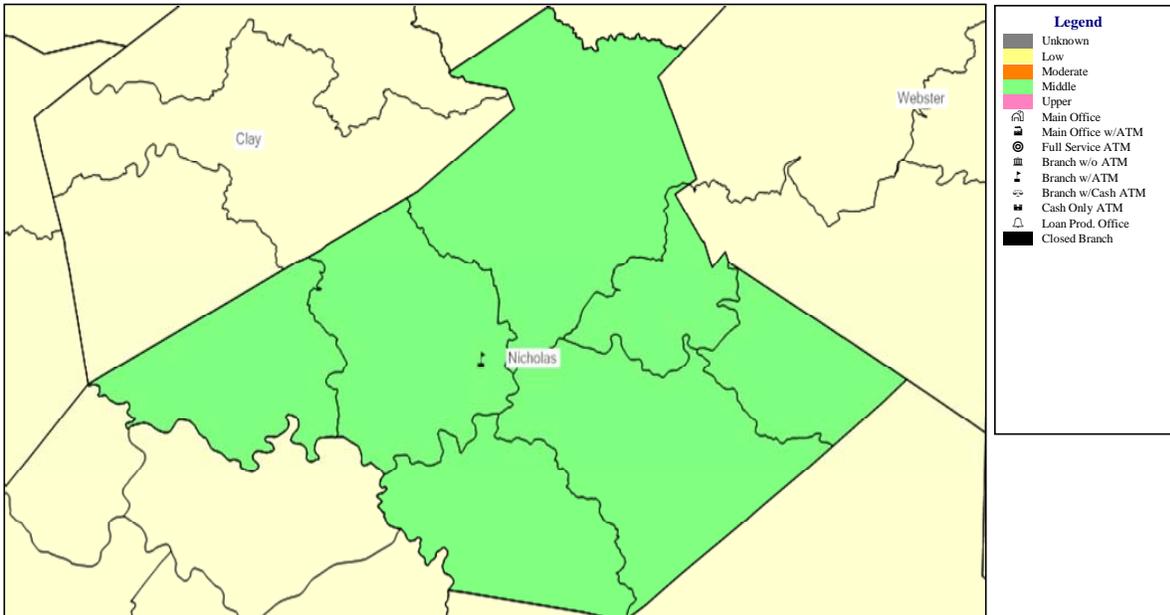
Community Trust Bank
 Assessment Area: NonMSA Eastern KY



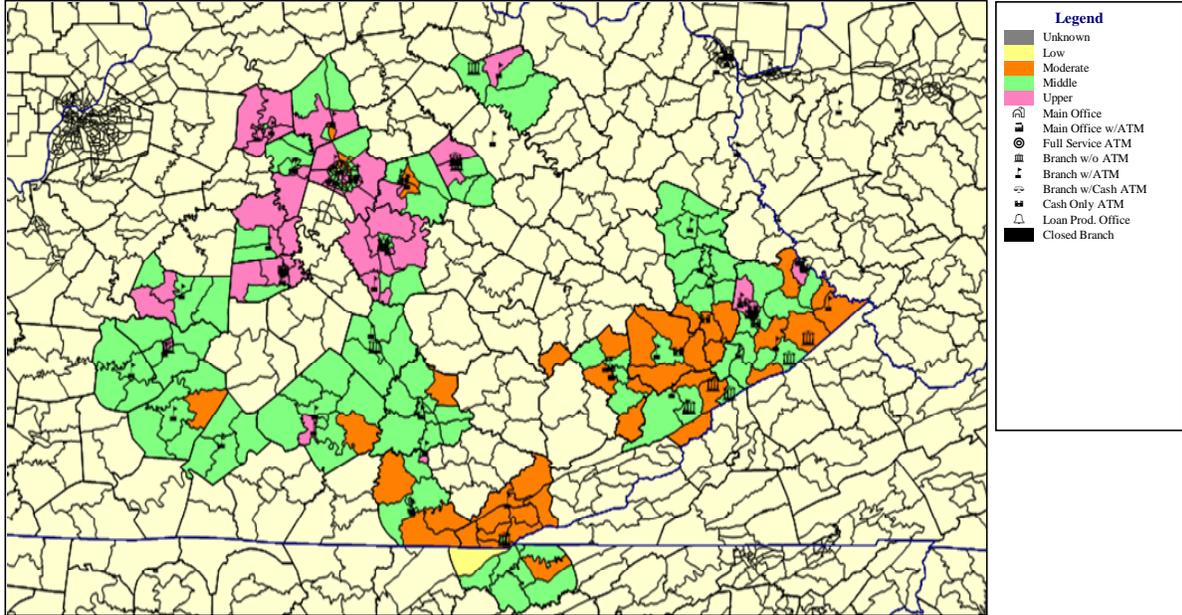
Community Trust Bank
Assessment Area: NonMSA WV1



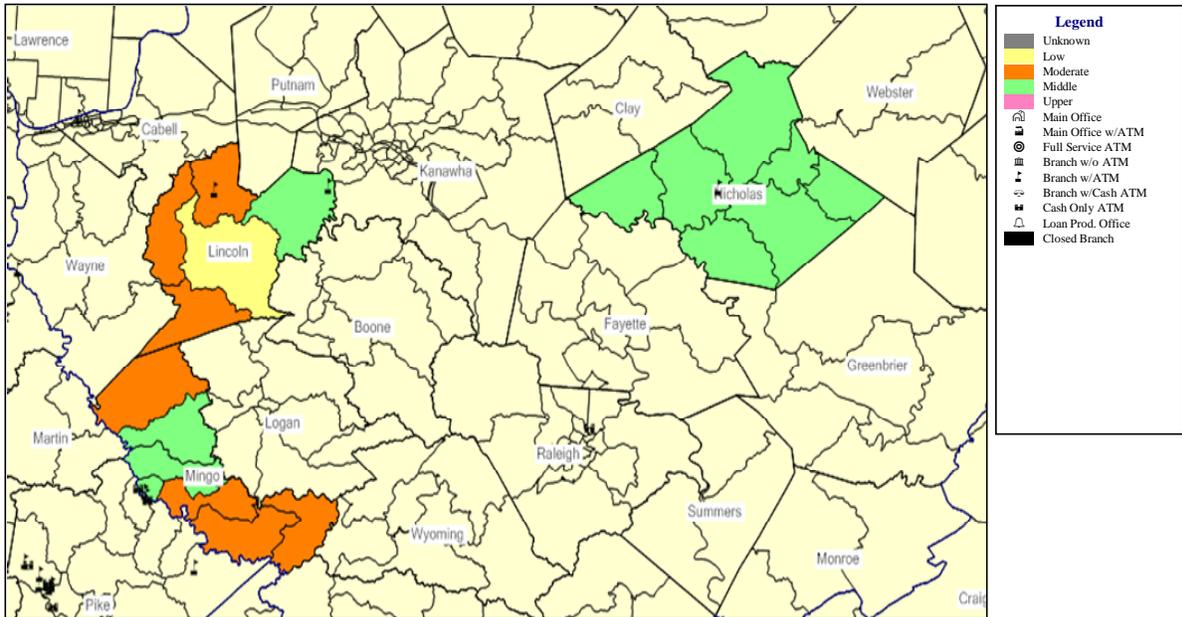
Community Trust Bank
Assessment Area: NonMSA WV2



Community Trust Bank
 Assessment Area: All KY



Community Trust Bank
 Assessment Area: All WV



Community Trust Bank
Assessment Area: Overall

