



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Public Disclosure

May 7, 2001

Community Reinvestment Act Performance Evaluation

Community Trust Bank, N.A.
Charter Number: 7030

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Pikeville, Kentucky 41501

Office of the Comptroller of the Currency

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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated "Satisfactory."

The following table indicates the performance level of Community Trust Bank, N.A. (CTB) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Community Trust Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory			X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

Lending Test

- Lending levels reflect good responsiveness to assessment area credit needs.
- Geographic distribution of loans by income level of geography was good.
- Distribution of loans by income level of the borrower was excellent.
- A high level of Community Development loans was made. The high level of Community Development loans had a positive impact on the lending test performance.
- A substantial majority of the bank's loans were originated within its AA.

Investment Test

- Given available opportunities, the level of qualified investments was adequate.

Service Test

- Delivery systems were reasonably accessible to geographies and individuals of different income levels in its AA.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies or individuals.

- Service and hours did not vary in a way that inconvenienced portions of the AAs, particularly low- and moderate-income geographies and individuals.
- An adequate level of Community Development Services was provided.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate - Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. The U.S. Census Bureau has established BNAs in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the U.S. Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten-year census and an average population of 4,000.

Community Development (CD) - Affordable 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.

Community Reinvestment Act (CRA) - The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Full-Scope Review - Performance under the lending, investment, and service tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

Geography - A census tract or a block numbering area delineated by the U.S. Census Bureau 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 applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

Home Mortgage Loans - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

Limited-Scope Review - Performance under the lending, investment, and service tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution).

Low-Income - Income levels that are less than 50 percent of the median family income.

Median Family Income (MFI) - The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Statistical Area (MSA) - Area defined by the director of the U.S. Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80 percent and less than 120 percent of the MFI.

Moderate-Income - Income levels that are at least 50 percent and less than 80 percent of the MFI.

Small Loans to Businesses - Loans with original amounts of \$1 million or less that are: (1) secured by non-farm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Loans to Farms - Loans with original amounts of \$500,000 or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital - The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income - Income levels that are 120 percent or more of the MFI.

Description of Institution

As of March 31, 2001, Community Trust Bank, N.A. (CTB), which is headquartered in Pikeville, Kentucky, had total assets of \$2.4 billion. The bank operates 69 offices and 62 ATMs located in two MSAs (Lexington, KY and Huntington, WV), seventeen non-MSA counties in Kentucky and three non-MSA counties in West Virginia.

CTB is an interstate bank. Eighty-nine percent of CTB's deposits (this percentage includes the Kentucky counties of the Huntington MSA #3400 rating area) and 92 percent of loans originated during the evaluation period are located in the state of Kentucky. CTB is a subsidiary of Community Trust Bancorp, Inc. Community Trust Bancorp, Inc. was approximately \$2.3 billion in asset size as of year-end 2000 and is headquartered in Pikeville, Kentucky. Community Trust Bancorp, Inc. also owns a trust company, Trust Company of Kentucky, N.A., which is headquartered in Lexington, Kentucky.

CTB offers a full range of banking products and services. As of March 31, 2001, loans totaled \$1.8 billion and deposits totaled \$2.1 billion. Loans represented 74% of total assets. The distribution of CTB's loan portfolio was as follows: commercial (includes commercial real estate) (38%); 1-4 family residential properties (25%); consumer loans (25%), construction and development (6%) and farm (3%). CTB is primarily a commercial lender and residential real estate lender. CTB's Tier 1 risk based capital to risk weighted assets equals 9.8% and Tier 1 leverage capital equals 7.7%. There are no legal, financial or other factors impeding the bank's ability to help meet the credit needs in its assessment areas.

CTB purchased the facilities and deposits of 5 branches from Bank One in June of 1998. Four of the branches are located in three non-MSA counties in West Virginia and one branch is located in the Huntington multi-state MSA #3400. CTB also purchased five branches from PNC in September of 1998. Three branches are located in the Lexington MSA and one branch is located in Mercer county, Kentucky.

Community Trust Bancorp, Inc. operated Community Trust Bank, FSB (CTB FSB) as a subsidiary during 1998 and 1999. Three CTB FSB branches that operate in Wal-Mart Stores were merged into CTB in October, 1998. CTB FSB was merged into CTB in 2000 adding eight branches distributed across eight non-MSA counties in Kentucky where CTB had not previously done business. CTB FSB's numbers were included at the bank's request. There were no bank operating subsidiaries and therefore no impact on CRA performance from these subsidiaries. CTB's CRA performance was rated "Satisfactory" in the last public evaluation dated February 23, 1998.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation assesses the bank's performance under the Lending, Investment and Service Tests. In evaluating the bank's lending performance, we reviewed their residential mortgage loans subject to filing under HMDA and small loans to businesses. We did not evaluate small farm loans since this is not a significant lending activity of CTB. With the exception of community development (CD) loans, the evaluation period for the Lending Test is January 1, 1998 through December 31, 2000. For CD loans, the Investment Test and the Services Test, the evaluation period is January 1, 1998 through May 7, 2001.

Data Integrity

As part of this CRA evaluation, we tested the accuracy of CTB's small loans to businesses and HMDA loan data. We found significant errors in the CRA data and required bank management to correct the information. During April 2001, we evaluated the bank's actions to correct the data and found the data to be reliable. This evaluation is based on accurate data.

CD loans, investments and services submitted by CTB management were verified to ensure that they met the regulatory definition for CD. Some items submitted by CTB for consideration were excluded from this evaluation because they did not meet the definition or purpose of CD.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, a sample of metropolitan and nonmetropolitan assessment areas (AAs) within that state were selected for full-scope reviews. The areas selected are representative of the types of areas in which the bank operates within Kentucky and West Virginia. Refer to the "Scope" section under each State Rating for details regarding how the areas were selected. The Huntington MSA #3400 metropolitan area, in which the bank has branches in more than one state, also received a rating and full-scope review.

Ratings

CTB's overall rating is a blend of the multistate metropolitan area rating and state ratings. The state of Kentucky rating area received the most weight since 80% of CTB's deposits (percentage excludes two counties in the state of Kentucky that are included in the Multistate Huntington MSA #3400) and the majority of bank offices are located in this rated area. The state of West Virginia and the Multistate Huntington MSA #3400 rating areas received the least weight since only 10% of CTB's deposits are located in each respective rated area.

The multistate metropolitan area rating(s) and state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each state rating for details regarding how the areas were weighted in arriving at the overall state rating.

Fair Lending Review

An analysis of 1998, 1999 and 2000 year's public comments and consumer complaint information, HMDA, small business and small farm lending data was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed in February, 1998.

Multistate Metropolitan Area Rating

CRA rating for the Huntington MSA #3400¹: Satisfactory

The lending test is rated:

High Satisfactory

The investment test is rated:

Satisfactory

Low

The service test is rated:

High Satisfactory

The major factors that support this rating include:

Lending Test

- Overall lending levels reflect adequate responsiveness to meeting the credit needs.
- The overall geographic distribution of loans was good. The geographic distribution of HMDA loans was good. The geographic distribution of small loans to businesses was excellent. There were no conspicuous gaps in the bank's lending patterns throughout its AA.
- The overall distribution of loans by income level in this AA was good. The distribution of HMDA loans by borrower income level was good. The distribution of small loans to businesses with annual revenues of \$1 million or less was good. The percent of loans to businesses for amounts less than \$100 thousand was good.

Investment Test

- Given the available opportunities, the level of qualified investments was adequate.

Service Test

- CTB's service delivery systems are readily accessible to geographies and individuals of different income levels in its AA.
- The bank's record of opening and closing branches has improved the accessibility delivery systems to the AA, particularly to low- and moderate-income geographies and individuals.
- Services and hours did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and individuals.
- An adequate level of community development services was provided.

¹ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Description of Institution's Operations in Huntington MSA # 3400

Refer to the market profile for the Huntington MSA #3400 AA in Appendix C for detailed demographics and other performance context information.

LENDING TEST

The bank's performance under the lending test in the Huntington MSA #3400 is rated **High Satisfactory**. Based on a full scope review, the bank's lending performance in the Huntington MSA #3400 AA is good.

Since there is only one AA, the ratings for Huntington MSA #3400 are based on the results of the single area receiving a full-scope review. See Appendix A for more information.

We placed more emphasis on HMDA loans when evaluating product performance based on identified credit needs and the fact that CTB originated more HMDA loans than small loans to businesses. Within HMDA, we placed equal weight on all three HMDA products based on loan volumes and credit needs. Refer to the Market Profiles in Appendix C for market information and community contacts relating to the Huntington MSA #3400 AA.

Lending Activity

Refer to Table 1 in the Huntington MSA #3400 section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Overall lending levels reflect adequate responsiveness to meeting the credit needs. Relative to its deposit market rank, CTB's HMDA lending levels are adequate and its small business lending levels are good. At June 30, 2000 CTB ranked first in deposits in the Huntington MSA #3400 AA with a 13% market share. The bank ranked fifth in overall volume of HMDA lending and fourth in small loans to businesses. In terms of market share, CTB had a HMDA market share of 4% and a market share of 11% of small loans to businesses. The HMDA market share is somewhat lower than its deposit market share for this AA and the small business market share is near its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in this AA was good. The geographic distribution of HMDA loans was good. The geographic distribution of small loans to businesses was excellent. There were no conspicuous gaps in the bank's lending patterns throughout its AA.

We considered the following factors in assessing the bank's lending performance in low- and moderate-income geographies.

There were no low-income geographies. Our review focused on lending performance relative to the level of owner occupied units in moderate-income geographies. The AA area has 18% of its owner occupied housing located in moderate-income geographies.

Home Mortgage Loans

Refer to Tables 2, 3 and 4 in the Huntington MSA #3400 AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

The overall geographic distribution of *home purchase loans* was good. The percent of home purchase loans to moderate-income tracts was somewhat lower than the percent of owner-occupied units in moderate-income tracts. The bank's market share in moderate-income tracts exceeds its overall market share.

Home Improvement Loans

The overall geographic distribution of *home improvement loans* was good. The percent of home improvement loans to moderate-income tracts was somewhat lower than the percent of owner-occupied units in moderate-income tracts. CTB's market share in moderate-income tracts exceeds its overall market share.

Home Refinance Loans

The overall geographic distribution of *refinanced loans* was adequate. The percent of refinanced loans in moderate-income tracts was somewhat lower than the percent of owner-occupied units in moderate-income tracts. The bank's market share to moderate-income tracts was somewhat lower than its overall market share.

Small Loans to Businesses

Refer to Table 5 in the Huntington MSA #3400 section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The overall geographic distribution of *small loans to businesses* was excellent. The bank's percent of small loans to businesses in moderate-income tracts exceeds the percent of businesses located in moderate-income tracts. The market share of small loans to businesses in moderate-income tracts exceeds the bank's overall market share.

Lending Gap Analysis

We evaluated the lending distribution of this AA to determine if any unexplained conspicuous gaps existed. We considered loan distributions, branch locations, competition, market conditions and demographic information. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

A substantial majority of the bank's loan originations were in their AAs. Overall, 83% of CTB's loan originations were within their AA. By loan product, 87% of HMDA loans and 80% of small loans to businesses was inside the AA. This analysis was performed on the entire bank rather than by AA.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level in this AA was good. The distribution of HMDA loans by borrower income level was good. The distribution of small loans to businesses with annual revenues of \$1 million or less was good. The percent of loans to businesses for amounts less than \$100 thousand was good.

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in the Huntington MSA #3400 section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

The overall distribution of *home purchase loans* by income level of the borrower was adequate. The bank's percent of home purchase loans to low-income borrowers was significantly lower than the percent of low-income families residing in the AA. This is mitigated by the fact that 19% of the households in the AA are below the poverty level. This means that a large portion of low-income households live below the poverty level and would have a difficult time purchasing and maintaining a home. The percent of home purchase loans to moderate-income borrowers was equal to the percent of moderate-income families residing in the AA. CTB's home purchase loan market share to low-income borrowers was somewhat lower than their overall market share. Their market share to moderate-income borrowers exceeds their overall market share.

Home Improvement Loans

The distribution of *home improvement loans* by borrower income level in the AA was good. The bank's percent of home improvement loans to low-income borrowers was lower than the percent of low-income families residing in the AA (see comments in Home Purchase section regarding the poverty level in this AA). The percent of home improvement loans to moderate-income borrowers exceeds the

percent of moderate-income families residing in the AA. CTB's home improvement market share to low-income borrowers was near their overall market share. Their market share to moderate-income borrowers exceeds their overall market share.

Home Refinance Loans

The overall distribution of *home refinance loans* by borrower income level was good. The bank's percent of refinanced loans to low-income borrowers was significantly lower than the percent of low-income families residing throughout the AA (see comments in the Home Purchase paragraph regarding poverty level). The bank's percent of refinanced loans to moderate-income borrowers exceeds the percent of moderate-income families. CTB's refinanced loan market share to low-income borrowers exceeds its overall market share. Their market share to moderate-income borrowers exceeds their overall market share.

Small Loans to Businesses

Refer to Table 10 in the Huntington MSA #3400 section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall distribution of *small loans to businesses* by income level was good. CTB's percent of small loans to businesses (businesses with annual revenues \$1 million dollars or less) is near the percentage of small businesses in the AA. The majority of the bank's loans were for amounts less than \$100,000. The market share of small loans to businesses exceeds their market share of loans to all businesses.

Community Development Lending

Refer to Table 1 in the Huntington MSA #3400 section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

The bank did not originate any qualified community development loans in this AA during the evaluation period. This had a neutral impact on lending performance in the AA.

Product Innovation and Flexibility

CTB does not offer innovative or flexible loan products targeted to low- or moderate-income individuals in this rating area. This had a neutral impact on lending performance in the AA.

INVESTMENT TEST

Refer to Table 12 in the Huntington MSA #3400 section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The bank's performance in the Huntington MSA #3400 Metropolitan Area was rated **Low Satisfactory** under the investment test. Based on a full-scope review, the bank's performance in the Huntington MSA #3400 AA is adequate.

Given the limited community development opportunities and needs in the AA, CTB's level of community development investments was adequate. Refer to the Market Profile section for details on needs and opportunities. The bank made \$20 thousand in qualified investments, all of which consisted of contributions to qualified CD organizations. These organizations include an organization that raises funds to help low- and moderate-income persons pay for health care, an organization that helps provide housing for low-income persons, and three organizations that primarily provide community services to low- and moderate- income individuals.

SERVICE TEST

The bank's performance under the Service Test in the Huntington MSA #3400 Metropolitan Area is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance in the Huntington MSA #3400 AA is good.

Retail Banking Services

Refer to Table 13 in the Huntington MSA #3400 section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

CTB's delivery systems are readily accessible to geographies and individuals of different income levels in its AA. The bank has seven banking offices in the Huntington MSA #3400 AA. In moderate-income tracts, the percentage of the bank's branches exceeds the percentage of the population residing in these tracts.

The banking services and hours of operation do not vary in a way that inconveniences its AA, particularly low- and moderate-income individuals and geographies. The majority of their banking offices are opened until noon on Saturdays and one office is open until 1:00 p.m. One moderate-income branch is closed on Saturday while all other offices in this AA are open. However, there is another branch open in the same moderate-income census tract that has extended hours. The extended Saturday hours for this moderate-income branch are 8:00 am to 1:00 pm. The other moderate-income branch in this AA has extended Saturday hours from 8:00 am to 12:00 pm. All other branches in this AA are located in middle- and upper-income tracts and have Saturday hours from 9:00 am to 12:00 pm.

The bank's record of opening and closing branches has improved the accessibility delivery systems to the AA, particularly to

low- and moderate-income geographies and individuals. During 1998, CTB purchased branches from Bank One. As a result, CTB acquired one office in the Huntington MSA # 3400 AA. The new office was located in a moderate-income census tract. During the evaluation period, CTB did not close any branches in the Huntington AA.

Community Development Services

CTB's performance in community development services is adequate based on the type of services provided and number of employees who participated. The level of community development services has had a positive impact on performance in the AA. A total of three employees provided financial services to three qualified community development organizations during the evaluation period. A description of these services follows: serving on the finance committee of an organization providing community development services to low and moderate-income persons; serving on the loan committee of a low interest loan fund for small business loans; and, serving on the Board of an organization promoting community development in moderate-income areas in the AA.

Two employees serve on the boards of Kentucky statewide organizations involved in community development. The officers offer their financial and banking expertise to the organizations.

One organization is the Housing Foundation that operates for the purpose of providing affordable housing. The other organization is the Commonwealth Small Business Development Corporation that finances businesses that meet the size eligibility standards of the Small Business Administration or have gross annual revenues of \$1 million or less.

State Rating

CRA Rating for Kentucky²: Satisfactory

The lending test is rated:

Outstanding

The investment test is rated:

Satisfactory

Low

The service test is rated:

High Satisfactory

The major factors that support this rating include:

Lending Test

- Overall lending levels reflect good responsiveness to meeting credit needs.
- The overall geographic distribution of loans was good. The geographic distribution of HMDA loans was good. The geographic distribution of loans to small businesses was good. There were no conspicuous gaps in the bank's lending patterns throughout its AAs.
- The overall distribution of loans by income level of the borrower was excellent. The distribution of HMDA loans was excellent. The borrower distribution of small loans to small businesses was excellent.
- A high level of Community Development loans was made. The high level of Community Development loans had a positive impact on the lending test performance.

Investment Test

- Given available opportunities, the level of qualified investments was adequate.

Service Test

- Delivery systems were reasonably accessible to geographies and individuals of different income levels in its AA.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies or individuals
- Service and hours did not vary in a way that inconvenienced portions of the AAs, particularly low- and moderate-income geographies and individuals.
- An adequate level of Community Development Services was provided.

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state 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 Kentucky

Refer to the market profiles for each AA in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Kentucky is rated **Outstanding**. Based on full-scope reviews, the bank's performance in the Pikeville Non-MSA is excellent and performance in the Lexington MSA is good.

From CTB's AAs in Kentucky, the Pikeville Non-MSA AA and the Lexington MSA AA were selected for full-scope reviews. These AAs represent CTB's major markets and account for fifty-one percent of loans originated in the state of Kentucky. The ratings for KY are based primarily on the results of the areas receiving full-scope reviews. See Appendix A for more information.

The Pikeville Non-MSA AA received the most weight in arriving at the overall conclusion. This AA represents CTB's largest market and accounts for 34% percent of the loans and 43% of the deposits in the state. The Lexington MSA accounts for 17% of the lending and 20% of the deposits in KY.

We placed more emphasis on HMDA loans when evaluating product performance based on identified credit needs and the fact that CTB originated more HMDA loans than small loans to businesses. Within HMDA, we placed equal weight on all three HMDA products based on loan volumes and credit needs.

Refer to the Market Profiles in Appendix C for market information and community contacts relating to the Pikeville Non-MSA AA and the Lexington MSA AA.

Lending Activity

Refer to Table 1 in the state of Kentucky section of appendix D for the facts and data used to evaluate the bank's lending activity.

Overall lending levels reflect good responsiveness to meeting the credit needs in the Pikeville Non-MSA AA. Relative to its deposit market rank, CTB's HMDA lending levels are good and its small business lending levels are good. At June 30, 2000 CTB ranked first in deposits with a 40% market share. The bank ranked first in overall volume of HMDA lending and first in small loans to businesses. In terms of market share, CTB has a HMDA market share of 20% and a 28% market share of small loans to

businesses. There were 186 lenders reporting HMDA loans in this area in 1999.

Overall lending levels reflect good responsiveness to meeting the credit needs in the Lexington MSA AA. Relative to its deposit market rank, CTB's HMDA lending levels are adequate and its small business lending levels are good. At June 30, 2000 CTB ranked fifth in deposits with a 5% market share. The bank ranked twenty-eighth in overall volume of HMDA lending and third in small loans to businesses. In terms of market share, CTB has a HMDA market share of 1% and a 10% market share of small loans to businesses. There were 385 lending institutions reporting HMDA loans in this area in 1999.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in AAs receiving full-scope reviews was good. The geographic distribution of HMDA loans was good. The geographic distribution of loans to small businesses was good. There were no conspicuous gaps in the bank's lending patterns throughout its AAs.

We considered the following factors in assessing the bank's lending performance in low- and moderate-income geographies. There are no low-income census tracts in the Pikeville Non-MSA AA and 35% of the AA's owner occupied housing is located in moderate-income geographies. The Lexington MSA AA has only 6 low-income census tracts with only 3% of the AA's owner occupied housing. The Lexington MSA AA has 16% of its owner occupied housing located in moderate-income geographies. Our review focused on lending performance relative to the level of owner occupied units in low- and moderate-income geographies.

Home Mortgage Loans

Refer to Tables 2, 3 and 4 in the state of Kentucky section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Home Purchase Loans

The overall geographic distribution of *home purchase loans* was good.

The geographic distribution of *home purchase loans* in the Pikeville Non-MSA AA was good. There are no low-income tracts in this AA. The percent of home purchase loans to moderate-income tracts was near the percent of owner-occupied units in moderate-income tracts. The bank's market share for home purchase loans in moderate-income tracts exceeds its overall market share.

The overall geographic distribution of *home purchase loans* in the Lexington MSA was good. The bank's percent of home purchase loans

in low-income tracts was somewhat lower than the percent of owner occupied units in low-income tracts. The percent of home purchase loans in moderate-income tracts was near the percent of owner-occupied units in moderate-income tracts. The bank's home purchase loan market share in low-income tracts exceeds its overall market share. The bank's home purchase loan market share in moderate-income tracts was near its overall market share.

Home Improvement Loans

The overall geographic distribution of *home improvement loans* was good.

The geographic distribution of *home improvement loans* in the Pikeville Non-MSA was good. There are no low-income tracts in this AA. The percent of home improvement loans to moderate-income tracts was near the percent of owner-occupied units in moderate-income tracts. The bank's market share for home improvement loans in moderate-income tracts exceeds its overall market share.

The overall geographic distribution of *home improvement loans* in the Lexington MSA was adequate. The bank's percent of home improvement loans in low-income tracts was lower than the percent of owner occupied units in low-income tracts. The percent of home improvement loans to moderate-income tracts was somewhat lower than the percent of owner-occupied units in moderate-income tracts. The bank's home improvement loan market share in low-income tracts was significantly lower than its overall market share. The bank's home improvement loan market share in moderate-income tracts was near its overall market share.

Home Refinance Loans

The overall geographic distribution of *home refinance loans* was good.

The geographic distribution of *home refinance loans* in the Pikeville Non-MSA was good. There are no low-income tracts in this AA. The percent of home refinance loans to moderate-income tracts was near the percent of owner-occupied units in moderate-income tracts. The bank's market share for home refinance loans in moderate-income tracts exceeds its overall market share.

The overall geographic distribution of *home refinance loans* in the Lexington MSA was adequate. The bank's percent of home refinance loans in low-income tracts is somewhat lower than the percent of owner occupied units in low-income tracts. The percent of home refinance loans to moderate-income tracts was lower than the percent of owner-occupied units in moderate-income tracts. The bank's home refinance loan market share in low-income tracts exceeds its overall market share. The bank's home refinance loan market share in moderate-income tracts was somewhat lower than its overall market share.

Small Loans to Businesses

Refer to Table 5 in the state of Kentucky section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of *small loans to businesses* was good.

The overall geographic distribution of *small loans to businesses* in the Pikeville Non-MSA AA was good. The bank's percent of small loans to businesses in moderate-income tracts was near the percent of businesses located in moderate-income tracts. The market share of small loans to businesses in moderate-income tracts exceeds the bank's overall market share.

The overall geographic distribution of *small loans to businesses* in the Lexington MSA AA was adequate. The bank's percent of small loans to businesses in low-income tracts was lower than the percent of businesses located in low-income tracts. The bank's percent of small loans to businesses in moderate-income tracts is lower than the percent of businesses located in moderate-income tracts. The market share of small loans to businesses in low-income tracts was near the bank's overall market share. The market share of small loans to businesses in moderate-income tracts somewhat lower than the bank's overall market share.

Lending Gap Analysis

We evaluated the lending distribution of this AA to determine if any unexplained conspicuous gaps existed. We considered loan distributions, branch locations, competition, market conditions, and demographic information. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

A substantial majority of the bank's loan originations were in their AAs. Overall, 83% of CTB's loan originations were within their AA. By loan product, 87% of HMDA loans and 80% of small loans to businesses was inside the AA. This analysis was performed on the entire bank rather than by AA.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level of the borrower in AAs receiving full-scope reviews was good. The distribution of HMDA loans was good. The geographic distribution of loans to small businesses was excellent.

We considered the following factors in assessing the bank's lending performance to low- and moderate-income individuals. Twenty-nine percent of the households in the Pikeville Non-MSA AA

were below the poverty level while fifteen percent of the households in the Lexington MSA AA were below the poverty level. Households below the poverty level would have a harder time qualifying for conventional home loans.

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in the state of Kentucky section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

The overall distribution of *home purchase loans* by income level of the borrower was excellent.

The distribution of home purchase loans by income level of borrower in the Pikeville Non-MSA AA was excellent. The bank's percent of home purchase loans to low-income borrowers was significantly lower than the percent of low-income families residing in the AA. This is mitigated by the fact that twenty-nine percent of the households in the Pikeville Non-MSA AA were below the poverty level. Households below the poverty level would have a harder time qualifying for conventional home loans.

The percent of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families residing in the AA. CTB's home purchase loan market share to low-income borrowers is near their overall market share. Their market share to moderate-income borrowers is near their overall market share.

The distribution of home purchase loans by income level of borrower in the Lexington MSA AA was excellent. The bank's percent of home purchase loans to low-income borrowers was somewhat lower than the percent of low-income families residing in the AA. This is mitigated by the fact that fifteen percent of the households in the Lexington MSA AA were below the poverty level. Households below the poverty level would have a harder time qualifying for conventional home loans. The percent of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families residing in the AA. CTB's home purchase loan market share to low-income borrowers exceeds their overall market share. Their market share to moderate-income borrowers exceeds their overall market share.

Home Improvement Loans

The overall distribution of *home improvement loans* by borrower income level was excellent.

The distribution of *home improvement loans* by borrower income level in the Pikeville Non-MSA AA was excellent. The bank's percent of home improvement loans to low-income borrowers was somewhat lower than the percent of low-income families residing

in the AA. This is mitigated by the fact that twenty-nine percent of the households in the Pikeville Non-MSA AA were below the poverty level. The percent of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families residing in the AA. CTB's home improvement market share to low-income borrowers exceeds their overall market share. Their market share to moderate-income borrowers exceeds their overall market share.

The distribution of *home improvement loans* by borrower income level in the Lexington MSA AA was excellent. The bank's percent of home improvement loans to low-income borrowers exceeds the percent of low-income families residing in the AA. The percent of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families residing in the AA. CTB's home improvement market share to low-income borrowers exceeds their overall market share. Their market share to moderate-income borrowers exceeds their overall market share.

Home Refinance Loans

The overall distribution of *home refinance loans* by borrower income level is good.

The distribution of *home refinance loans* by borrower income level in the Pikeville Non-MSA AA was good. The bank's percent of refinanced loans to low-income borrowers was lower than the percent of low-income families residing throughout the AA. The bank's percent of refinanced loans to moderate-income borrowers was near the percent of moderate-income families. CTB's refinanced loan market share to low-income borrowers was near its overall market share. Their market share to moderate-income borrowers was near their overall market share.

The distribution of *home refinance loans* by borrower income level in the Lexington MSA AA was excellent. The bank's percent of refinanced loans to low-income borrowers was somewhat lower than the percent of low-income families residing throughout the AA. The bank's percent of refinanced loans to moderate-income borrowers exceeds the percent of moderate-income families. CTB's refinanced loan market share to low-income borrowers exceeds its overall market share. Their market share to moderate-income borrowers exceeds their overall market share.

Small Loans to Businesses

Refer to Table 10 in the state of Kentucky section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The overall distribution of *small loans to businesses* by income level was excellent.

The distribution of small loans to businesses in the Pikeville Non-MSA AA was excellent. CTB's percent of small loans to businesses (businesses with annual revenues \$1 million dollars or less) exceeds the percentage of small businesses in the AA. The majority of the bank's loans were for amounts less than \$100,000. The market share of small loans to businesses exceeds their market share of loans to all businesses.

The distribution of small loans to businesses in the Lexington MSA AA was excellent. CTB's percent of small loans to businesses (businesses with annual revenues \$1 million dollars or less) exceeds the percentage of small businesses in the AA. The majority of the bank's loans were for amounts less than \$100,000. The market share of small loans to businesses exceeds their market share of loans to all businesses.

Community Development Lending

Refer to Table 1 in the state of Kentucky section of appendix D for the facts and data used to evaluate the bank's level of community development lending.

CTB's level of community development loans is excellent based on the available lending opportunities within the bank's AA. The level of community development lending represents approximately 12% of Tier 1 capital despite the fact that opportunities are very limited in this rating area. These loans have had a positive impact on lending performance in CTB's AA.

In the Pikeville Non-MSA AA, CTB made two loans totaling \$7 million to a company to purchase assets through U.S Bankruptcy Court proceedings. One loan was for \$2 million and the other for \$5 million. The loan helped the community retain 206 jobs by keeping the company in business. The company is located in a middle income tract in Letcher County. However, it is surrounded by four moderate-income tracts and there are several others in close proximity. Letcher County is also designated as a "distressed county" by the Appalachian Regional Commission. The loans qualify as community development because they have the effect of stabilizing moderate-income areas through job retention.

CTB did not make any community development loans in the Lexington MSA AA during this evaluation period. The impact on performance in this AA was neutral.

Product Innovation and Flexibility

CTB does offer a flexible loan product targeted to low- or moderate-income individuals in the Pikeville and Lexington AAs. This product had a positive impact on performance in the Lexington AA and a neutral impact on performance in the Pikeville AA. The bank has a program called the *Homestead Loan Program*. The program is targeted to low- and moderate-income persons. To

qualify for this program, income must not be more than 80% of the median family income and the borrower must not qualify for any other CTB mortgage. Home ownership counseling is required and CTB considers ways other than credit bureaus to document an applicant's credit record. CTB has originated eleven loans totaling \$727 thousand in the Lexington AA during the evaluation period. CTB has originated one loan totaling \$79 thousand in the Pikeville AA during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Kentucky Non-MSA AA is not inconsistent with the bank's overall Outstanding performance under the lending test in the state of Kentucky. This performance had a positive impact on the overall lending test rating. Refer to the Tables 1 through 11 in the state of Kentucky section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Kentucky is rated **Low Satisfactory**. Based on full-scope reviews, the bank's performance in the Lexington MSA AA and in the Pikeville non-MSA AA is adequate.

Refer to Table 12 in the state of Kentucky section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Given the available community development opportunities and needs in the Pikeville Non-MSA AA CTB's performance is adequate.

The \$28 thousand of current period investments consisted of contributions to qualified CD organizations. These organizations include: two organizations involved in promoting community development by financing small businesses; and three organizations involved in providing community development services to low- and moderate-income individuals.

CTB also had two prior period investments totaling \$407 thousand in the Pikeville AA. These investments have a continuing positive impact on the AA. One is an equity investment in a partnership for the purpose of developing a housing project for low-income individuals. The complex is in a moderate-income geography in Knott County and qualifies for low-income housing tax credits. The other investment is a \$50 thousand equity investment in a Community Development Corporation. This organization exists for the purpose of stimulating economic development and micro-lending to small businesses in Bell, Harlan and Letcher counties. Letcher County is in the Pikeville AA and Bell County is in the other AA in Kentucky evaluated in a limited

scope. The investment was applied pro rata to each respective AA.

Given the available community development opportunities and needs in the Lexington MSA AA CTB's performance is adequate. Refer to the Market Profile section for details on the needs and opportunities. During this evaluation period, the bank made 4 qualified investments totaling \$11 thousand. All of these investments consisted of contributions to qualified CD organizations. These organizations include an organization that helps provide housing for low-income persons, an organization involved in providing community development services to low- and moderate income individuals, an organization which helps low-income persons repair their homes, and one organization that provides credit counseling to low- and moderate-income persons.

CTB also had one prior period investment totaling \$118 thousand in the Lexington MSA AA. This investment has a continuing positive impact on the AA. This is an equity investment in an organization for the purpose of building a single room occupancy project with 100 units for low-income individuals. This investment qualifies for low-income housing tax credits. The building is located in Fayette County in a moderate-income tract.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Kentucky Non-MSA AA is not inconsistent with the bank's overall Low Satisfactory performance under the investment test in Kentucky. Refer to the Tables 1 through 11 in the state of Kentucky section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Kentucky is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance in the Lexington MSA and the Pikeville non-MSA assessment areas are good.

Retail Banking Services

Refer to Table 13 in the state of Kentucky section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

In the Pikeville non-MSA AA, CTB's delivery systems are reasonably accessible to geographies and individuals of different income levels. In moderate-income tracts, the percentage of the bank's branches is lower than the percentage of the population residing in these tracts.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems in the Pikeville AA, particularly to low- and moderate-income geographies or individuals. In 1998, the bank closed one branch in the Pikeville non-MSA AA which was located in a middle-income tract in Letcher County. The branch was consolidated with a branch in close proximity. CTB still has two branches operating in that particular census tract.

In the Lexington MSA AA, CTB's delivery systems are accessible to geographies and individuals of different income levels. In low-income census-tracts, the percentage of the bank's branches is lower than the percentage of population residing in these tracts. In moderate-income tracts, the percentage of the bank's branches exceeds the percentage of the population residing in these tracts.

The bank's record of opening and closing branches has improved the accessibility of delivery systems in the Lexington AA, particularly to low- and moderate-income areas. In 2000, the bank closed two branches in the Lexington MSA AA. One was located in a middle-income tract and the other was located in an upper-income tract. Both were operated in grocery stores and located in Fayette County. CTB opened 7 branches during the evaluation period. In 1998 CTB opened six branches in this AA. Two branches were opened in moderate-income tracts and one branch was opened in a middle-income tract in Madison County. Three branches were opened in middle-income tracts in Clark County. CTB opened one branch in 1999 in an upper-income tract in Fayette County.

The banking services and hours of operation do not vary in a way that inconveniences portions of the Lexington MSA or Pikeville Non-MSA AAs, particularly low- and moderate-income individuals and geographies. All of the banking offices have extended Friday hours and some are opened until 6 p.m. on Saturdays. In the Pikeville AA, one of the three branches in moderate-income tracts has Saturday hours. Those hours are 8:00 am to 12:00 pm. Four of the fifteen offices located in middle- or upper-income tracts have Saturday hours. Four offices offer extended hours. The Weddington Plaza office is open from 8:00 am until 4:00 pm and the WalMart Super Center office is open from 10:00 am until 6:00 pm. The Town Mountain and Tug Valley branches are open weekdays 8:00 am until 6:00 pm and Saturday from 9:00 am to 2:00 pm. These offices are opened for extended periods due to the fact they are located in high traffic shopping centers.

Community Development Services

The overall level of community development services is adequate.

CTB's performance in providing community development services in the Pikeville non-MSA AA is adequate based on the number of organizations benefiting and number of employees participating.

Community development services have had a positive impact on performance in the AA. Seven employees provided financial services to six community development organizations. Services provided included: serving as a board member and treasurer for a Health Council in an under served area with high poverty rates; two employees serving as Board members and one as treasurer for an organization involved in affordable housing; assisting in fund raising activities for an organization involved in affordable housing; an employee serves on two organizations working to bring businesses into distressed area, and two employees serving on the Board of a community development corporation that makes loans to small businesses.

CTB's performance in community development services in the Lexington MSA AA is adequate based on the number of organizations benefiting and number of employees participating. CTB's community development services have had a positive impact on performance in the AA. Three employees provided the following community development services: serving on the operating committee of an organization involved in credit counseling for low- and moderate-income persons, providing first time home buyer education to low- and moderate-income individuals, and teaching budgeting classes to low-income women.

Two employees serve on the Boards of statewide organizations involved in community development. The officers offer their financial and banking expertise to the organizations. One organization is the Housing Foundation that operates for the purpose of providing affordable housing. The other organization is the Commonwealth Small Business Development Corporation that finances businesses that meet the size eligibility standards of the Small Business Administration or have gross annual revenues of \$1 million or less.

CTB services thirty-one mortgages for the Habitat for Humanity that were originated in this AA. These loans were originated by the Habitat for Humanity to low-income individuals. CTB services these loans free of charge as a community service.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Kentucky non-MSA area is not inconsistent with the bank's overall High Satisfactory performance under the service test in Kentucky. Refer to Table 13 in the state of Kentucky section of appendix D for the facts and data that support these conclusions.

State Rating

CRA Rating for West Virginia³:

	<u>Satisfactory</u>	
The lending test is rated:		<u>High</u>
<u>Satisfactory</u>		
The investment test is rated:		<u>Low</u>
<u>Satisfactory</u>		
The service test is rated:		<u>Low</u>
	<u>Satisfactory</u>	

The major factors that support this rating include:

Lending Test

- Overall lending levels reflect good responsiveness to meeting the credit needs in the West Virginia Non-MSA AA.
- The overall geographic distribution of loans was adequate. The geographic distribution of HMDA loans was adequate. The geographic distribution of loans to small businesses was good. There were no conspicuous gaps in the bank's lending patterns throughout its AA.
- The overall distribution of loans by borrower income level in this AA good. The distribution of HMDA loans by borrower income level is good. The distribution of small loans to businesses with annual revenues of \$1 million or less is excellent. The percent of loans to businesses for amounts less than \$100 thousand was excellent.

Investment Test

- Given available opportunities, the level of qualified investments was adequate.

Service Test

- Delivery systems were reasonably accessible to geographies and individuals of different income levels.
- Service and hours did not vary in a way that inconvenienced portions of the AA, particularly low- and moderate-income individuals and geographies.
- The bank did not provide any community development services in this rating area during the evaluation period. This had a negative impact on performance in the AA during the evaluation period.

³ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state 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 West Virginia

Refer to the market profiles for the state of West Virginia in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in West Virginia is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance in the West Virginia Non-MSA AA is good.

Since there is only one AA, the ratings for the West Virginia Non-MSA AA are based on the results of the single area receiving a full-scope review. See Appendix A for more information.

We placed more emphasis on HMDA loans when evaluating product performance based on identified credit needs and the fact that CTB originated more HMDA loans than small loans to businesses. Within HMDA, we placed equal weight on all three HMDA products based on loan volumes and identified credit needs. Refer to the Market Profiles in Appendix C for market information and community contacts relating to the West Virginia Non-MSA AA.

Lending Activity

Refer to Table 1 in the state of West Virginia section of appendix D for the facts and data used to evaluate the bank's lending activity.

Overall lending levels reflect good responsiveness to meeting the credit needs in the West Virginia Non-MSA AA. Relative to its deposit market rank, CTB's HMDA lending levels are good and its small business lending levels are good. At June 30, 2000 CTB ranked eighteenth in deposits with a 1% market share. The bank ranked fifth in overall volume of HMDA lending and sixth in small loans to businesses. In terms of market share, CTB has a HMDA market share of 5% and a 7% market share of small loans to businesses.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in this AA was adequate. The geographic distribution of HMDA loans was adequate. The geographic distribution of loans to small businesses was good. There were no conspicuous gaps in the bank's lending patterns throughout its AAs.

We considered the following factors in assessing the bank's lending performance in low- and moderate-income geographies.

There are no low-income census tracts in the West Virginia Non-MSA AA and 40% of the AA's owner occupied housing is located in moderate-income geographies. Our review focused on lending distributions compared to owner occupied housing levels.

Home Mortgage Loans

Refer to Tables 2, 3 and 4 in the state of West Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Home Purchase Loans

The overall geographic distribution of *home purchase loans* in the West Virginia Non-MSA AA was adequate. The percent of home purchase loans to moderate-income tracts was near the percent of owner-occupied units in moderate-income tracts. The bank's home purchase loan market share in moderate-income tracts was lower than its overall market share.

Home Improvement Loans

The overall geographic distribution of *home improvement loans* in the West Virginia Non-MSA AA was good. The percent of home purchase loans to moderate-income tracts was near the percent of owner-occupied units in moderate-income tracts. The bank's home purchase loan market share in moderate-income tracts was near its overall market share.

Home Refinance Loans

The overall geographic distribution of *home refinance loans* in the West Virginia Non-MSA AA was adequate. The percent of home purchase loans to moderate-income tracts was somewhat lower than the percent of owner-occupied units in moderate-income tracts. The bank's home purchase loan market share in moderate-income tracts was lower than its overall market share.

Small Loans to Businesses

Refer to Table 5 in the state of West Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of *small loans to businesses* in the West Virginia Non-MSA AA was good. The bank's percent of small loans to businesses in moderate-income tracts was near the percent of businesses located in moderate-income tracts. The market share of small loans to businesses in moderate-income tracts was near the bank's overall market share.

Lending Gap Analysis

We evaluated the lending distribution of this AA to determine if any unexplained conspicuous gaps existed. We considered loan distributions, branch locations, competition, market conditions, and demographic information. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

A substantial majority of the bank's loan originations were in their AAs. Overall, 83% of CTB's loan originations were within their AA. By loan product, 87% of HMDA loans and 80% of small loans to businesses was inside the AA. This analysis was performed on the entire bank rather than by AA.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in the state of state of West Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of loans by income level in this AA was good. The distribution of HMDA loans by borrower income level was good. The distribution of small loans to businesses with annual revenues of \$1 million or less was excellent. The percent of loans to businesses for amounts less than \$100 thousand was excellent.

Home Purchase Loans

The distribution of home purchase loans by income level of borrower in the West Virginia Non-MSA AA was good. The bank's percent of home purchase loans to low-income borrowers was significantly lower than the percent of low-income families residing in the AA. This is mitigated by the fact that 28.55% of the households in the AA are below the poverty level. The percent of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families residing in the AA. CTB's home purchase loan market share to low-income borrowers was significantly lower than their overall market share. Their market share to moderate-income borrowers was lower than their overall market share.

Home Improvement Loans

The distribution of *home improvement loans* by borrower income level in the West Virginia Non-MSA AA was good. The bank's percent of home improvement loans to low-income borrowers was lower than the percent of low-income families residing in the AA (see comments in Home Purchase section regarding the percentage of households living below poverty level in this AA). The percent

of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families residing in the AA. CTB's home improvement market share to low-income borrowers exceeds their overall market share. Their market share to moderate-income borrowers was near their overall market share.

Home Refinance Loans

The distribution of *home refinance loans* by borrower income level in the West Virginia Non-MSA AA was adequate. The bank's percent of refinanced loans to low-income borrowers was significantly lower than the percent of low-income families residing throughout the AA (see comments in the Home Purchase paragraph regarding percentage of households living below poverty level). The bank's percent of refinanced loans to moderate-income borrowers was somewhat lower than the percent of moderate-income families. CTB's refinanced loan market share to low-income borrowers was somewhat lower than its overall market share. Their market share to moderate-income borrowers was near their overall market share.

Small Loans to Businesses

Refer to Table 10 in the state of West Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of small loans to businesses in the West Virginia Non-MSA AA was excellent. CTB's percent of small loans to businesses (businesses with annual revenues \$1 million dollars or less) exceeds the percentage of small businesses in the AA. The majority of the bank's loans were for amounts less than \$100,000. The market share of small loans to businesses exceeds their market share of loans to all businesses.

Community Development Lending

Refer to Table 1 in the state of West Virginia section of appendix D for the facts and data used to evaluate the bank's level of community development lending.

The bank did not originate any qualified community development loans in this AA during the evaluation period. This had a neutral impact on CTB's performance in the AA during the evaluation period.

Product Innovation and Flexibility

CTB does not offer innovative or flexible loan products targeted to low- or moderate-income individuals in this rating area. The impact of this is neutral on the AA.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in West Virginia is rated **Low Satisfactory**. Based on full-scope reviews, the bank's performance in the West Virginia non-MSA AA is adequate.

Refer to Table 12 in the state of West Virginia section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Given the limited community development investment opportunities in the AA, CTB's level of community development investments was adequate. Refer to the Market Profile section for details on needs and opportunities. The bank made three investments totaling \$3 thousand. All three qualified investments consisted of contributions to qualified CD organizations. These organizations are involved in promoting community development by providing community development services targeted to low- and moderate-income persons.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in West Virginia is rated **Low Satisfactory**. Based on full-scope reviews, the bank's performance in the non-MSA West Virginia AA is adequate.

Retail Banking Services

Refer to Table 13 in the state of West Virginia section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

CTB's delivery systems are reasonably accessible to geographies and individuals of different income levels in its AA. In moderate-income tracts, the percentage of the bank's branches is lower than the population residing in this area.

The banking services and hours of operation do not vary in a way that inconveniences its AA, particularly low- and moderate-income individuals and geographies. All of their banking offices are opened until noon on Saturdays.

The bank's record of opening and closing branches has not adversely affected the accessibility of delivery systems in the AA, particularly to low- and moderate-income areas. In 1998 CTB acquired four banking offices from Bank One in the non-MSA West Virginia AA. The new offices were located in moderate-income

census tracts and middle-income census tracts. During the evaluation period, CTB closed two branches. One was located in a moderate-income census tract and the other was located in a middle-income census tract. Both branches were consolidated into another CTB offices in close proximity.

Community Development Services

The bank did not provide any community development services in this rating area during the evaluation period. This had a negative impact on performance in the AA during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term "full-scope") and those that received a less comprehensive review (designated by the term "limited-scope").

Time Period Reviewed	Lending Test (excludes CD Loans): 1/1/1998 to 12/31/2000 Investment and Service Tests and CD Loans: 1/1/1998 to 5/7/2001	
Financial Institution	Products Reviewed	
Community Trust Bank, N.A. (CTB) Pikeville, Kentucky	Residential Mortgage Loans Small Business and Small Farm Loans Community Development Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not applicable.		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Huntington MSA #3400	Full-Scope	Counties of Boyd and Greenup, KY County of Wayne, WV
Lexington, KY MSA #4280	Full-Scope	Counties of Clark, Fayette, Madison and Woodford, KY
Pikeville, KY Non-MSA	Full-Scope	Counties of Floyd, Knott, Letcher and Pike, KY
West Virginia Non-MSA	Full-Scope	Counties of Lincoln, Mingo and Nicholas, WV
Kentucky Non-MSA	Limited-Scope	Counties of Adair, Bell, Fleming, Franklin, Green, Laurel, Marion, Mercer, Montgomery, Pulaski, Russell, Taylor and Whitley, KY County of Claiborne, TN

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS		COMMUNITY TRUST BANK, N.A.		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
COMMUNITY TRUST BANK, N.A.	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
HUNTINGTON MSA #3400	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
KENTUCKY	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
WEST VIRGINIA	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Huntington MSA #3400	C-2
Lexington, KY MSA #4280	C-4
Pikeville, KY Non-MSA	C-6
West Virginia Non-MSA	C-8

Huntington MSA #3400

Demographic Information for Full-Scope Area: Huntington MSA #3400						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	22	0	31.82	40.91	27.27	0
Population by Geography	92,012	NA	20.83	48.96	30.21	0
Owner-Occupied Housing by Geography	26,326	NA	17.69	48.83	33.48	0
Businesses by Geography	3,687	NA	26.53	52.21	21.26	0
Farms by Geography	79	NA	3.80	64.56	31.64	0
Family Distribution by Income Level	26,661	22.25	15.06	18.00	44.69	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	9,947	NA	31.36	47.71	20.93	0
Median Family Income	= \$26,374	Median Housing Value			= \$45,137	
HUD Adjusted Median Family Income for 2000	= \$36,100	Unemployment Rate			= 3.43%	
Households Below the Poverty Level	= 19.03%					

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

Source: 1990 U.S. Census and 2000 HUD updated MFI.

The Huntington MSA #3400 AA is comprised of Boyd and Greenup counties in Kentucky and Wayne County in West Virginia, three of five that make up the Multi State MSA. The area includes counties in the northeast corner of Kentucky, the far southwest in West Virginia and the southeast border of Ohio. Healthcare, retail services and manufacturing provide the largest number of jobs in the area.

Although there are no low-income census tracts, 37% of the population in these three counties is low- and moderate-income. The percentage of households below the poverty level of 19% ranks above the Kentucky state average of 14% and the West Virginia state average of 17%. The area's unemployment rate of 3.4% was slightly below Kentucky's unemployment rate of 3.7% in December, 2000 but well below West Virginia's rate of 6.7%. This indicates jobs are available but wages are below a level adequate to support area families.

CTB operates 7 branches and 4 ATMs in the Huntington MSA #3400 AA. As of June 30, 2000, the bank reported total deposits of \$173 million. That represented 13% of the local deposit market share. CTB ranked first in the market. First & Peoples Bank and National City Bank of Kentucky were both ranked second with 12% market shares. There were a total of 18 banking and thrift companies doing business in the AA as of June 30, 2000.

Approximately 9% of CTB's deposits were located inside the AA. Bank wide, 83% of loans originated during this evaluation period

were inside CTB's combined AAs. Five percent of loan originations were located in the Huntington MSA #3400 AA.

CTB's primary business focus is residential real estate and consumer lending. The bank also engages in significant small business lending in this AA.

We reviewed prior community contact forms and the Consolidated HUD plan for the MSA. We also made one community contact to determine the community credit and development needs of the AA. Our review identified affordable housing loans either directly through banks or through nonprofit agencies as a credit need. Additionally, small business and start up business loans were identified as credit needs.

Based on our contacts and review, the level of available qualified investments in this AA is very limited. The City of Huntington is not part of CTB's AA, as the bank does not operate a branch in the City of Huntington or the county where it is located. CTB's presence is in the suburban and rural counties that are part of this MSA. These areas do not have many groups or organizations that present investment opportunities. CD needs were identified in low- and moderate-income multi family housing. Homebuyer assistance for low-income persons is also an identified CD need.

State of Kentucky Assessment Areas

Lexington MSA Assessment Area

Demographic Information for Full-Scope Area: Lexington MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	80	7.50	21.25	42.50	27.50	1.25
Population by Geography	332,325	6.79	20.47	43.28	29.36	0.09
Owner-Occupied Housing by Geography	72,512	3.31	16.45	46.43	33.82	0
Businesses by Geography	14,292	5.89	26.86	41.53	25.47	00.25
Farms by Geography	786	1.65	10.82	59.03	28.50	0
Family Distribution by Income Level	85,779	21.46	15.91	20.90	41.72	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	32,062	9.99	28.50	46.72	14.79	0
Median Family Income	= \$32,687	Median Housing Value		= \$73,847		
HUD Adjusted Median Family Income for 2000	= \$52,700	Unemployment Rate		= 2.76%		
Households Below the Poverty Level	= 15.31%					

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

Source: 1990 U.S. Census and 2000 HUD updated MFI.

The Lexington MSA AA is comprised of Clark, Fayette, Madison and Woodford Counties, four of seven that make up the Lexington MSA.

The four county area is located in the Bluegrass region of Kentucky, home to approximately one-half of Kentucky's population and its largest cities. The healthcare industry is the primary employer in Fayette County followed by retail businesses and manufacturing companies. Manufacturing ranks first, retail businesses second and healthcare third in Clark, Madison and Woodford Counties.

Low- and moderate-income families make up 37% of the population.

The percentage of households below the poverty level of 15.3% ranks above the state average of 13.8%. The unemployment rate of 2.8% was below the state unemployment rate of 3.7% in December, 2000. This indicates jobs are available but at low wages.

CTB operates 14 branches and 17 ATMs in the Lexington AA. As of June 30, 2000, the bank reported total deposits of \$304 million.

That represented 6.37% of the local deposit market share. CTB ranked fifth in the market. Bank One ranked first with 20.66% market share and Central Bank and Trust ranked second with 11.62% of market share. There were a total of 37 banking and thrift companies doing business in the AA as of June 30, 2000.

Approximately 20% of CTB's deposits were located inside the AA. Bank wide, 83% of loans originated during this evaluation period were inside CTB's combined AAs. Sixteen percent of originations were located in the Lexington AA.

CTB's primary business focus in this AA is residential and consumer lending. The also engages in significant small business lending in this AA.

We reviewed prior community contact forms and the Consolidated HUD plan for the MSA. We also made one community contact to determine community credit and development needs. We contacted one community organization that provides affordable housing for low- and moderate-income individuals. Our contact identified affordable housing loans for low-income individuals as a credit need. Our review also identified loans to finance start up and small businesses as a credit need.

Based on our contacts and review, qualified investments in this AA are limited. Investment opportunities are limited and may have been obtained by institutions that have a greater presence in the AA. However community development opportunities exist in low- and moderate-income multi-family housing. These opportunities include increasing the supply of affordable housing and rehabilitating substandard low-income housing.

Pikeville Non-MSA Assessment Area

Demographic Information for Full-Scope Area: Pikeville Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	41	NA	36.59	58.54	2.44	2.44
Population by Geography	161,075	NA	34.80	62.05	3.15	0
Owner-Occupied Housing by Geography	44,207	NA	34.60	62.11	3.29	0
Businesses by Geography	4,476	NA	18.16	71.99	9.85	0
Farms by Geography	39	NA	17.95	71.79	10.26	0
Family Distribution by Income Level	46,206	30.06	17.47	17.76	34.72	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	21,959	NA	39.95	58.18	1.87	0
Median Family Income	= \$22,542	Median Housing Value			= \$37,149	
HUD Adjusted Median Family Income for 2000	= \$34,600	Unemployment Rate			= 4.42%	
Households Below the Poverty Level	= 29.27%					

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

Source: 1990 U.S. Census and 2000 HUD updated MFI.

The Pikeville AA is made up of the counties of Pike, Floyd, Letcher and Knott. The four county area is located in far eastern Kentucky. Coal mining operators are the largest employers in three of the four counties. The healthcare industry is the largest employer in Floyd County and the second largest in Pike, Letcher and Knott Counties. Other major employers include retail, local government, food service and transportation and warehousing businesses.

Although there are no low-income census tracts, low- and moderate-income persons make up just under 48% of the population. The percentage of households living below poverty level of 29% is well above the state average of 14%. The unemployment rate of 4.4% is also above the state average of 3.7%. High poverty levels and unemployment rates negatively impact the bank's ability to lend to low-income borrowers.

CTB is headquartered in Pikeville, the county seat of Pike County. CTB operates 18 branches and 18 ATMs in the AA. Eleven branches are located in Pike County, five in Letcher County, and one each in Floyd and Knott Counties. As of June 30, 2000, CTB ranked first among financial institutions serving the AA with \$663 million in deposits representing a 40% market share. Major competitors include two large regional banks, and several community banking and thrift companies.

Approximately 35% of CTB's deposits were located inside the AA. Bank wide, 83% of loans originated during this evaluation period were inside CTB's combined AAs. Thirty-one percent of originations were located in the Pikeville AA.

We reviewed community contact forms, made three new contacts, and reviewed the Consolidated HUD plan for the state of Kentucky. Two of our contacts were involved in economic development organizations and one was a realtor. Our contacts identified affordable housing and job creation as two key local community development needs. One contact stated the banks are active in helping with federal assistance programs and working with small businesses. Another stated affordable loans are a credit need but bank involvement in providing low-cost mortgage loans is limited because the greatest need is among the very low-income who cannot afford market rate loans. Additionally, small business and start up business loans were identified as credit needs.

Based on our contacts and review, the level of available qualified investments in this AA is very limited. CTB's presence in this AA is in rural counties that are depressed. These areas do not have many groups or organizations that present investment opportunities for the bank. Community Development opportunities exist in the rehabilitation of low-income owner occupied housing. Additionally, community development opportunities were noted in attracting new businesses to the area and small business lending to help diversify the economy and employment base. These opportunities would create new jobs for the area. All four counties in the non-MSA Pikeville AA have been designated as "distressed counties" by the Appalachian Regional Commission. They receive this designation due to high poverty levels, low per capita income, and high unemployment rates.

State of West Virginia Assessment Area

West Virginia Non-MSA Assessment Area

Demographic Information for Full-Scope Area: West Virginia Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	19	0	47.37	52.63	0	0
Population by Geography	81,896	NA	42.00	58.00	0	0
Owner-Occupied Housing by Geography	22,599	NA	39.75	60.25	0	0
Businesses by Geography	1,751	NA	28.90	71.10	0	0
Farms by Geography	31	NA	12.90	87.10	0	0
Family Distribution by Income Level	23,243	29.68	17.12	17.36	35.83	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	10,879	NA	47.88	52.12	0	0
Median Family Income	= \$22,654	Median Housing Value			= \$40,567	
HUD Adjusted Median Family Income for 2000	= \$30,600	Unemployment Rate			= 4.96%	
Households Below the Poverty Level	= 28.55%					

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

Source: 1990 U.S. Census and 2000 HUD updated MFI.

The West Virginia non-MSA AA includes the counties of Lincoln, Mingo and Nicholas. Lincoln and Mingo are contiguous counties located in far southwestern West Virginia. Nicholas County is located in central West Virginia. Mining is the primary industry in Mingo County, with retail services, healthcare and transportation and warehousing following at relatively equal positions. Retail and healthcare are the primary employers in Nicholas and Lincoln counties. Manufacturing ranks third in Nicholas county. Construction ranks third in Lincoln county.

Although there are no low-income census tracts, 47% of the population in these three counties is low- and moderate-income. The percentage of households living below the poverty level of 29% ranks well above the state average of 17%. The unemployment rate 5% was below the state unemployment rate of 6.7% in December, 2000. High poverty levels and unemployment rates negatively impact the bank's ability to lend to low-income borrowers. All three counties in this AA have been designated as "distressed counties" by the Appalachian Regional Commission. They receive that designation based on high poverty levels, low per capita income, and high unemployment rates.

CTB operates four branches and four ATMs in the West Virginia non-MSA AA. Two branches are located in Lincoln County, one in Mingo and one in Nicholas. As of June 30, 2000, the bank reported total deposits of \$170 million. That represented 22% of

the deposit market share in the three counties. CTB ranked second in the market. Branch Banking and Trust Company ranked first with a 30 % market share. One Valley Bank ranked third with 14% of market share. There were nine banking and thrift companies operating a total of 36 offices in the AA as of June 30, 2000.

Approximately 10% of CTB's deposits were located inside the AA. Bank wide, 83% of loans originated during this evaluation period were inside CTB's combined AAs. Three percent of originations were located in the West Virginia Non-MSA AA.

CTB's primary business focus in this AA is residential real estate and consumer lending. The bank also engages in significant small business lending in the AA.

We reviewed prior community contact forms, made one contact, and reviewed the Consolidated HUD plan for the state of West Virginia. Based on our contacts and review, available qualified investment opportunities are very limited. CTB's presence in this AA is in rural counties that are depressed. These areas do not have many groups or organizations that present investment opportunities for the bank. Credit needs affordable single family housing for low- and moderate-income individuals and programs serving first-time homebuyers. Additionally, community development opportunities exist in the rehabilitation of substandard housing and micro loans for small businesses.

Appendix D: Tables of Performance Data

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Huntington MSA	
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Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables.

References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MSA/AA.

The following is a listing and brief description of the tables included in each set:

Table 1. Lending Volume - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/assessment area.

Table 2. Geographic Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 3. Geographic Distribution of Home Improvement Loans - See Table 2.

Table 4. Geographic Distribution of Refinance Loans - See Table 2.

Table 5. Geographic Distribution of Small Loans to Businesses - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 6. Geographic Distribution of Small Loans to Farms - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout

those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 7. Borrower Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

Table 8. Borrower Distribution of Home Improvement Loans - See Table 7.

Table 9. Borrower Distribution of Refinance Loans - See Table 7.

Table 10. Borrower Distribution of Small Loans to Businesses - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

Table 11. Borrower Distribution of Small Loans to Farms - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 12. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and

dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must have been reported on schedule RC-L of the call reports as an off-balance-sheet item.

Table 13. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

Table 14. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MSA/assessment area.

Charter Number: 7030

Table 1. Lending Volume

LENDING VOLUME		Evaluation Period: 01/01/1998 TO 12/31/2000										
MSA/Assessment Area	% of Rating Area Deposits in AA*	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Rating Area Loans in AA (% of #)
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Scope												
Huntington MSA #3400	100	562	22,883	304	33,954	4	397	0	0	870	57,234	100

* Deposit Data as of June 30, 1999.

Charter Number: 7030

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Huntington MSA #3400	0	0	18	13	49	36	33	51	14	2.9	0.0	3.9	2.3	3.4	132	100

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home purchase loans within an MSA/AA as a % of all home purchase loans in the rating area.

Charter Number: 7030

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Improvement Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Huntington MSA #3400	0	0	18	13	49	57	33	30	2	19.8	0.0	26.5	20.2	15.8	212	100

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home improvement loans within an MSA/AA as a % of all home improvement loans in the rating area.

Charter Number: 7030

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Mortgage Refinance Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Huntington MSA #3400	0	0	18	10	49	44	33	46	6	5.0	0.0	3.7	4.4	6.3	218	100

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Refinance loans within an MSA/AA as a % of all refinance loans in the rating area.

Charter Number: 7030

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL BUSINESS										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Huntington MSA #3400	0	0	32	38	43	38	25	24	4	10.8	0.0	13.7	10.1	12.1	304	100

* Based on 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.

** Small Business loans within an MSA/AA as a % of all Small Business loans in the rating area.

Charter Number: 7030

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL FARM																
Evaluation Period: 01/01/1998 TO 12/31/2000																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Loans Small Farm Loans	
	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Huntington MSA #3400	0	0	2	33	58	67	40	0	4	12.5	0.0	0.0	50.0	0.0	4	100

* Based on 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.
 ** Small Farm loans within an MSA/AA as a % of all Small Farm loans in the rating area.

Charter Number: 7030

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HMDA HOME PURCHASE										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*					Total Home Purchase Loans	
	% of Families	% Bank Loans* *	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Huntington MSA #3400	22	3	15	15	18	25	45	57	14	2.9	2.1	3.0	4.6	2.9	132	100

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Charter Number: 7030

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT																
Evaluation Period: 01/01/1998 TO 12/31/2000																
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share By Borrower Income*					Total Home Improvement Loans	
	% of Families	% Bank Loans* *	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Huntington MSA #3400	22	9	15	23	18	25	45	43	2	19.8	17.0	23.6	20.0	19.7	212	100

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Charter Number: 7030

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Families		Moderate Income Families		Middle Income Families		Upper Income Families		Overall Market Rank*	Market Share by Borrower Income*					Total Loans	
	% of Families	% Bank Loans* *	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Huntington MSA #3400	22	8	15	21	18	22	45	49	6	5.0	6.2	7.9	6.2	4.5	218	100

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Charter Number: 7030

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL BUSINESS			Evaluation Period: 01/01/1998 TO 12/31/2000							
MSA/Assessment Area	Businesses With Revenues of \$1 million or less			% Distribution of Loans by Original Amount Regardless of Business Size			Market Share*		Total Small Business Loans	
	% Business**	% Bank Loans***	% Market Loans*	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total
Full Scope										
Huntington MSA #3400	87	83	53	70	18	12	10.8	12.1	304	100

* The market consists of all other Small Business reporters in CTB's assessment area and is based on 1999 Aggregate Small Business Data only.

** Businesses with revenues of \$1 million or less as a percentage of all businesses.

*** Loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No revenue information was available for 12% of small loans to businesses reported by CTB.

Charter Number: 7030

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL FARM			Evaluation Period: 01/01/1998 TO 12/31/2000							
MSA/Assessment Area	Businesses With Revenues of \$ 1million or less			% Distribution Loans by Original Amount Regardless of Farm Size			Market Share*		Total Small Farm Loans	
	% Farms**	% Bank Loans***	% Market Loans*	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total
Full Scope										
Huntington MSA #3400	95	100	88	67	33	0	12.5	12.5	4	100

* The market consists of all other Small Farm reporters in CTB's assessment area and is based on 1999 Aggregate Small Business Data only.

** As a Percentage of Farms with known revenues.

*** As a percentage of loans with borrower income information available.

Charter Number: 7030

Table 12. Qualified Investments

QUALIFIED INVESTMENTS		Evaluation Period: 01/01/1998 TO 5/7/2001							
MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investment			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Scope									
Huntington MSA #3400	0	0	7	20	7	20	100	0	0

* 'Prior Period Investments' means investments made in a previous evaluation period that remains outstanding as of the examination date.
 ** "Unfunded Commitments" means legally binding commitments reported on Report of Condition Schedule L-"Off-Balance Sheet Items".

Charter Number: 7030

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH DELIVERY SYSTEM																Evaluation Period: 01/01/1998 TO 5/7/2001			
MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings				Population							
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net gain(+) / loss(-) of Branches due to openings/closings				% of the Population with Each Geography*					
				Low (%)	Mod (%)	Mid (%)	Upp (%)			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp		
Full Scope																			
Huntington MSA #3400	100	7	100	0	42	29	29	0	1	0	+1	0	0	0	21	49	30		

* The percentage of the population in the MSA/AA that resides in these geographies.

Charter Number: 7030

Table 1. Lending Volume

LENDING VOLUME												Evaluation Period: 01/01/1998 TO 12/31/2000	
MSA/Assessment Area	% of Rating Area Deposits in AA*	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Rating Area Loans in AA (% of #)	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
Full Scope													
Lexington MSA	20	862	64,287	1,355	117,639	360	16,230	0	0	2,577	198,156	17	
Pikeville Non-MSA	43	3,583	129,672	1,425	79,160	2	52	2	7,000	5,012	215,884	34	
Limited Scope													
KY Non-MSA	37	3,861	168,725	2,095	103,584	1,396	29,844	2	1,218	7354	303,371	49	

* Deposit Data as of June 30, 1999.

Charter Number: 7030

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Lexington MSA	3	2	16	13	47	57	34	28	23	1.2	2.2	1.0	1.5	0.8	334	15
Pikeville Non-MSA	NA	NA	35	29	62	63	3	8	1	28.0	NA	31.8	24.6	45.2	895	40
Limited Scope																
KY Non-MSA	1	1	19	19	57	62	23	18	3	9.7	18.2	13.1	11.3	5.5	1,016	45

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home purchase loans within an MSA/AA as a % of all home purchase loans in the rating area.

Charter Number: 7030

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Improvement Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Lexington MSA	3	1	16	9	47	88	34	2	9	4.1	0.0	3.3	6.5	0.5	109	6
Pikeville Non-MSA	NA	NA	35	28	62	67	3	5	1	54.3	NA	54.8	52.4	78.0	915	51
Limited Scope																
KY Non-MSA	1	3	19	44	57	45	23	8	1	31.3	87.5	53.4	26.7	17.2	754	43

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home improvement loans within an MSA/AA as a % of all home improvement loans in the rating area.

Charter Number: 7030

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Mortgage Refinance Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Lexington MSA	3	2	16	8	47	67	34	23	22	1.5	2.2	0.9	2.2	0.8	418	10
Pikeville Non-MSA	NA	NA	35	27	62	68	3	5	1	39.6	NA	44.7	36.6	50.9	1,773	41
Limited Scope																
KY Non-MSA	1	1	19	19	57	64	23	16	1	13.9	84.6	23.3	15.9	6.8	2,089	49

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Refinance loans within an MSA/AA as a % of all refinance loans in the rating area.

Charter Number: 7030

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL BUSINESS																
Evaluation Period: 01/01/1998 TO 12/31/2000																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Lexington MSA	6	3	27	12	42	68	25	17	3	10.3	9.4	7.5	15.6	4.3	1,355	28
Pikeville Non-MSA	0	0	18	17	72	73	10	10	1	28.3	0.0	31.3	28.7	41.3	1,425	29
Limited Scope																
KY Non-MSA	0	1	13	18	59	54	28	27	1	18.1	40.0	18.7	19.6	15.6	2095	43

* Based on 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.

** Small Business loans within an MSA/AA as a % of all Small Business loans in the rating area.

Charter Number: 7030

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL FARM																
Evaluation Period: 01/01/1998 TO 12/31/2000																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Loans Small Farm Loans	
	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Lexington MSA	2	1	11	2	59	93	28	4	3	17.3	0.0	21.4	19.5	8.1	360	20
Pikeville Non-MSA	NA	NA	18	0	72	100	10	0	3	20.0	NA	0.0	50.0	0.0	2	1
Limited Scope																
KY Non-MSA	0	0	8	2	72	78	20	20	1	46.0	0	16.9	56.3	20.9	1,396	79

* Based on 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.

** Small Farm loans within an MSA/AA as a % of all Small Farm loans in the rating area.

Charter Number: 7030

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HMDA HOME PURCHASE										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*					Total Home Purchase Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Lexington MSA	21	15	16	25	21	20	42	40	23	1.2	2.0	1.4	0.9	1.5	334	15
Pikeville Non-MSA	30	11	17	19	18	25	35	45	1	28.0	23.2	25.8	28.4	33.9	895	40
Limited Scope																
KY Non-MSA	24	12	16	19	20	26	40	43	3	9.7	12.6	9.2	10.7	10.9	1,016	45

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Charter Number: 7030

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share By Borrower Income*					Total Home Improvement Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Lexington MSA	21	28	16	29	21	24	42	19	9	4.1	10.5	6.5	2.5	1.9	109	6
Pikeville Non-MSA	30	23	17	24	18	25	35	28	1	54.3	72.4	60.1	49.3	44.7	915	51
Limited Scope																
KY Non-MSA	24	27	16	23	20	24	40	26	1	31.3	50.8	37.3	29.3	21.9	754	43

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Charter Number: 7030

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Families		Moderate Income Families		Middle Income Families		Upper Income Families		Overall Market Rank*	Market Share by Borrower Income*					Total Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Lexington MSA	21	15	16	22	21	26	42	37	22	1.5	3.0	2.4	2.1	1.3	418	10
Pikeville Non-MSA	30	11	17	15	18	22	35	52	1	39.6	39.4	34.6	45.6	44.1	1,773	41
Limited Scope																
KY Non-MSA	24	8	16	14	20	26	40	52	1	13.9	22.3	16.1	17.9	15.7	2,089	49

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Charter Number: 7030

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL BUSINESS			Evaluation Period: 01/01/1998 TO 12/31/2000							
MSA/Assessment Area	Businesses With Revenues of \$1 million or less			% Distribution of Loans by Original Amount Regardless of Business Size			Market Share*		Total Small Business Loans	
	% Business**	% Bank Loans***	% Market Loans*	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total
Full Scope										
Lexington MSA	87	94	55	80	12	8	10.3	13.1	1355	28
Pikeville Non-MSA	86	91	35	87	9	4	28.3	33.7	1425	29
Limited Scope										
KY Non-MSA	87	100	56	90	8	2	18.1	22.3	2095	43

* The market consists of all other Small Business reporters in CTB's assessment area and is based on 1999 Aggregate Small Business Data only.

** Businesses with revenues of \$1 million or less as a percentage of all businesses.

*** Loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No revenue information was available for 17% of small loans to businesses reported by CTB.

Charter Number: 7030

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL FARM			Evaluation Period: 01/01/1998 TO 12/31/2000							
MSA/Assessment Area	Businesses With Revenues of \$ 1million or less			% Distribution Loans by Original Amount Regardless of Farm Size			Market Share*		Total Small Farm Loans	
	% Farms**	% Bank Loans***	% Market Loans*	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total
Full Scope										
Lexington MSA	96	99	73	92	6	2	17.3	17.4	360	20
Pikeville Non-MSA	100	100	80	100	0	0	20.0	20.0	2	1
Limited Scope										
KY Non-MSA	99	72	50	96	4	0	46.0	47.7	1396	79

* The market consists of all other Small Farm reporters in CTB's assessment area and is based on 1999 Aggregate Small Business Data only.

** As a Percentage of Farms with known revenues.

*** As a percentage of loans with borrower income information available.

Charter Number: 7030

Table 12. Qualified Investments

QUALIFIED INVESTMENTS									
Evaluation Period: 01/01/1998 TO 05/07/2001									
MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investment			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Scope									
Lexington MSA	1	118	4	11	5	129	22	0	0
Pikeville Non-MSA	2	407	7	28	9	435	73	0	0
Limited Scope									
KY Non-MSA	1	25	5	7	6	32	5	0	0

* 'Prior Period Investments' means investments made in a previous evaluation period that remains outstanding as of the examination date.
 ** "Unfunded Commitments" means legally binding commitments reported on Report of Condition Schedule L-"Off-Balance Sheet Items".

Charter Number: 7030

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH DELIVERY SYSTEM																	Evaluation Period: 01/01/1998 TO 05/07/2001			
MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings						Population						
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net gain(+) / loss(-) of branches due to openings/closings				% of the Population with Each Geography*						
				Low (%)	Mod (%)	Mid (%)	Upp (%)			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp			
Full Scope																				
Lexington MSA	20	14	23	0	29	50	21	2	7	0	+2	+3	0	7	21	43	29			
Pikeville Non-MSA	43	18	34	NA	17	61	22	1	0	0	0	-1	0	NA	35	62	3			
Limited Scope																				
KY Non-MSA	37	26	43	0	13	52	35	2	14	0	+1	+9	+2	1	19	56	24			

* The percentage of the population in the MSA/AA that resides in these geographies.

Charter Number: 7030

Table 1. Lending Volume

LENDING VOLUME												Evaluation Period: 01/01/1998 TO 12/31/2000											
MSA/Assessment Area	% of Rating Area Deposits in AA*	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Rating Area Loans in AA (% of #)											
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)												
Full Scope																							
West Virginia Non-MSA	100	383	10,720	117	5,609	13	152	0	0	513	16,481	100.00											

* Deposit Data as of June 30, 1999.

Charter Number: 7030

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
West Virginia Non-MSA	0	0	40	32	60	68	0	0	8	4.5	0.0	2.1	6.1	0.0	78	100

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home purchase loans within an MSA/AA as a % of all home purchase loans in the rating area.

Charter Number: 7030

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Improvement Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
West Virginia Non-MSA	0	0	40	34	60	66	0	0	2	34.5	0.0	29.1	38.5	0.0	157	100

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home improvement loans within an MSA/AA as a % of all home improvement loans in the rating area.

Charter Number: 7030

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Mortgage Refinance Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
West Virginia Non-MSA	0	0	40	28	60	72	0	0	1	11.5	0.0	4.9	15.0	0.0	148	100

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Refinance loans within an MSA/AA as a % of all refinance loans in the rating area.

Charter Number: 7030

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL BUSINESS										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
West Virginia Non-MSA	0	0	29	23	71	77	0	0	6	6.6	0.0	5.5	8.1	0.0	117	100

* Based on 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.

** Small Business loans within an MSA/AA as a % of all Small Business loans in the rating area.

Charter Number: 7030

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL FARM		Evaluation Period: 01/01/1998 TO 12/31/2000														
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Loans Small Farm Loans	
	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
West Virginia Non-MSA	0	0	13	64	87	36	0	0	1	57.1	0.0	100.0	25.0	0.0	13	100

* Based on 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.

** Small Farm loans within an MSA/AA as a % of all Small Farm loans in the rating area.

Charter Number: 7030

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HMDA HOME PURCHASE										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*					Total Home Purchase Loans	
	% of Families	% Bank Loans* *	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
West Virginia Non-MSA	30	3	17	18	17	21	36	58	8	4.5	0.0	1.2	4.3	7.6	78	100

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Charter Number: 7030

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share By Borrower Income*					Total Home Improvement Loans	
	% of Families	% Bank Loans* *	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
West Virginia Non-MSA	30	13	17	22	17	31	36	34	2	34.5	42.3	33.3	40.0	30.0	157	100

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.
 ** As a percentage of loans with borrower income information available.

Charter Number: 7030

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Families		Moderate Income Families		Middle Income Families		Upper Income Families		Overall Market Rank*	Market Share by Borrower Income*					Total Loans	
	% of Families	% Bank Loans* *	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
West Virginia Non-MSA	30	5	17	12	17	22	36	61	1	11.5	7.7	10.6	9.8	17.3	148	100

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.
 ** As a percentage of loans with borrower income information available.

Charter Number: 7030

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL BUSINESS			Evaluation Period: 01/01/1998 TO 12/31/2000							
MSA/Assessment Area	Businesses With Revenues of \$1 million or less			% Distribution of Loans by Original Amount Regardless of Business Size			Market Share*		Total Small Business Loans	
	% Business**	% Bank Loans***	% Market Loans*	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total
Full Scope										
West Virginia Non-MSA	85	100	57	90	7	3	6.6	7.9	117	100

* The market consists of all other Small Business reporters in CTB's assessment area and is based on 1999 Aggregate Small Business Data only.

** Businesses with revenues of \$1 million or less as a percentage of all businesses.

*** Loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No revenue information was available for 19% of small loans to businesses reported by the CTB.

Charter Number: 7030

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL FARM			Evaluation Period: 01/01/1998 TO 12/31/2000							
MSA/Assessment Area	Businesses With Revenues of \$ 1million or less			% Distribution Loans by Original Amount Regardless of Farm Size			Market Share*		Total Small Farm Loans	
	% Farms**	% Bank Loans***	% Market Loans*	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total
Full Scope										
West Virginia Non-MSA	100	100	43	100	0	0	57.1	50.0	13	100

* The market consists of all other Small Farm reporters in CTB's assessment area and is based on 1999 Aggregate Small Business Data only.

** As a Percentage of Farms with known revenues.

*** As a percentage of loans with borrower income information available.

Charter Number: 7030

Table 12. Qualified Investments

QUALIFIED INVESTMENTS		Evaluation Period: 01/01/1998 TO 05/07/2001							
MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investment			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Scope									
West Virginia Non-MSA	0	0	3	3	3	3	100	0	0

* 'Prior Period Investments' means investments made in a previous evaluation period that remains outstanding as of the examination date.
 ** "Unfunded Commitments" means legally binding commitments reported on Report of Condition Schedule L-"Off-Balance Sheet Items".

Charter Number: 7030

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH DELIVERY SYSTEM																Evaluation Period: 01/01/1998 TO 05/07/2001			
MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings						Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net gain(+) / loss(-) of branches due to openings/closings				% of the Population with Each Geography*					
				Low (%)	Mod (%)	Mid (%)	Upp (%)			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp		
Full Scope																			
West Virginia Non-MSA	100	4	100	0	25	75	0.00	2	4	0	0	+2	0	0	42	58	0		

* The percentage of the population in the MSA/AA that resides in these geographies.

