

# **PUBLIC DISCLOSURE**

November 27, 2023

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Whitaker Bank, Inc.  
RSSD #1445943

2001 Pleasant Ridge Drive  
Lexington, Kentucky 40509

Federal Reserve Bank of Cleveland

P.O. Box 6387  
Cleveland, Ohio 44101-1387

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including LMI neighborhoods, consistent with the safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## INSTITUTION'S COMMUNITY REINVESTMENT ACT (CRA) RATING: OUTSTANDING

The following table indicates the performance level of Whitaker Bank, Inc. with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	Whitaker Bank PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory		X	
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors supporting the institution's rating include:

- A good responsiveness to credit needs;
- A substantial majority of loans originated in the bank's assessment area (AA);
- A good geographic distribution of loans throughout the AA;
- A good distribution of loans among borrowers of different income levels and businesses and farms of different sizes;
- A good record of serving the credit needs of low-income individuals and areas and very small businesses;
- A leader in making community development loans;
- Makes limited use of flexible lending practices in serving the AA's credit needs;
- A significant level of qualified community development investments and grants;
- Retail delivery systems are accessible to geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has improved the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the AAs; and,
- A leader in providing community development services.

## DESCRIPTION OF INSTITUTION

### **Overview**

Whitaker Bank, Inc. (Whitaker) is a wholly owned subsidiary of Whitaker Bank Corporation of Kentucky, a bank holding company. Both companies are headquartered in Lexington, Kentucky. As of June 30, 2023, Whitaker reports total assets of \$2.0 billion and total deposits of \$1.7 billion, representing a 66.7% increase in total assets and 78.4% increase in total deposits since the previous evaluation. The holding company owns a nonbank subsidiary, but this entity is not engaged in either lending activities or investment qualified CRA activities.

On December 1, 2020, Peoples Bank & Trust Company of Madison County (Peoples) merged into Whitaker. Peoples was owned by Whitaker Bank Corporation of Kentucky. There was an overlap between the two banks' AAs; as a result, Whitaker's Nonmetropolitan Kentucky AA did not change after this merger. Whitaker acquired nine branches. Lending and community development activities from this merger will be assessed in this performance evaluation.

### **Business Lines**

Whitaker operates with three lines of business. These business units provide traditional banking services to business and retail clients:

- Commercial Banking – includes checking, savings, eServices, treasury solutions; and business, commercial real estate and construction, term, lines of credit, Small Business Administration (SBA), and agricultural loans.
- Investments – includes wealth management, retirement plan services, brokerage services, personal trust services, and insurance services.
- Retail Banking – includes checking, savings, debit cards, credit cards, eServices; and real estate, mortgage, home equity lines, and consumer loans.

### **Assessment Areas**

The following summarizes Whitaker's AAs evaluated as part of this CRA performance evaluation:

- Nonmetropolitan Kentucky, consisting of the entireties of Bath, Boyle,<sup>1</sup> Breathitt, Clay, Estill, Fleming, Franklin, Garrard, Jackson, Knott, Knox, Laurel, Lee, Leslie, Letcher, Madison, Menifee, Mercer, Montgomery, Nicholas, Owsley, Perry, Powell, Rockcastle, Rowan, Whitley, and Wolfe counties.
- Lexington-Fayette KY MSA #45780, consisting of the entire MSA (Bourbon, Clark, Fayette, Jessamine, Scott, and Woodford counties).

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<sup>1</sup> Boyle County was added to the AA in 2020 as a result of a branch opening.

## **Financial Overview**

Whitaker offers a wide variety of consumer, residential real estate, commercial, and agricultural loan products to fulfill the credit needs of the residents and businesses in its AAs. Consumer loan products include auto loans, personal lines of credit, installment loans, home equity loans, mortgage loans, and credit cards. Whitaker offers construction lending and commercial loan products, including term loans, bridge loans, lines of credit, business credit cards, and Small Business Administration (SBA) loans. Whitaker also offers its customers remote deposit, mobile and online banking services (e.g., Mobile Deposit, BillPay, PopMoney, eStatements, Apple Pay, Google Pay, and Samsung Pay), and identity theft prevention.

The following chart displays Whitaker's loan portfolio composition as of June 30, 2023.

<b>Composition of Loan Portfolio as of June 30, 2023</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	84,533	9.2
Farmland	41,082	4.5
1-4 Family Residential Real Estate	339,108	36.8
Multifamily Residential Real Estate	43,619	4.7
Non-Farm Non-Residential Real Estate	317,641	34.5
Agricultural	8,781	1.0
Commercial and Industrial	41,495	4.5
Consumer	36,245	3.9
Other	8,450	0.9
<b>Gross Loans</b>	<b>920,954</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

Whitaker's investment portfolio as of June 30, 2023, was \$892.6 million, representing 45.6% of total assets. U.S. Treasury & Agency securities accounted for 67.7% of investments, while municipal securities and all other securities comprised 23.6% and 8.1% of total investments, respectively. The remaining 0.6% of total investments consisted of interest-bearing bank balances.

No known legal impediments exist that would restrain Whitaker from meeting the credit needs of its AAs.

## **Previous Public Evaluation**

Whitaker's CRA performance was evaluated using the CRA examination procedures for large banks. Whitaker received a Satisfactory rating in the January 6, 2020, CRA Performance Evaluation. The lending, investment, and services tests were each rated High Satisfactory.

## SCOPE OF EXAMINATION

For the purpose of this evaluation, Whitaker is an intrastate bank with two delineated CRA AAs in Kentucky. Nonmetropolitan Kentucky received a full-scope review, and the Lexington-Fayette KY MSA (Lexington) received a limited-scope review.

Nonmetropolitan Kentucky was selected to receive the full-scope review and given the most weight in this evaluation, because it is Whitaker's primary market. It has the most branches, highest market share of deposits, and highest volume of lending.

### **Examination Evaluation Period and Products Reviewed**

This evaluation includes an analysis of HMDA- and CRA-reportable loans originated from July 1, 2019, through December 31, 2022. In Nonmetropolitan Kentucky small business, small farm, home purchase, and refinance loans were evaluated separately each year. There was only enough volume to evaluate home improvement loans in 2022. Multi-family and other purpose closed-end loans were not considered in this evaluation due to limited volume.

Based on the total loan volume and dollar amounts, small business loans received the greatest weight followed by HMDA-reportable loans (home purchase, refinance, and home improvement, respectively) and small farm loans. If lending performance differed between years, more weight was given to 2021 performance, the year with the most loans by volume and dollar amount.

Community development loans and investments funded between January 7, 2020, through November 27, 2023, were reviewed as part of the lending and investment tests, respectively. Investments with community development as a primary purpose that were funded during a prior evaluation period, but still Outstanding as of December 31, 2022, were also considered. Lastly, community development services that occurred during the evaluation period were reviewed as part of the service test evaluation.

A summary of the scope of the examination is listed in Appendix A.

### ***Examination Analysis***

Whitaker is being evaluated using the large bank CRA examination procedures. The following criteria was considered in this evaluation: the volume of lending by number of loans and dollar amount as a percentage of overall and statewide lending activity, deposit market share, number of branches, percentage of deposits, percentage of LMI geographies, volume of community development activity, and other non-financial considerations. Where comparable activity was noted, full-scope AAs not selected at the previous examination were considered.

This evaluation of Whitaker's lending record in individual AAs includes the utilization of and comparison to demographic characteristics. The primary sources for demographic data are the

U.S. Census Bureau and Dun & Bradstreet.<sup>2</sup> Demographic characteristics of a particular AA are useful in analyzing a financial institution's lending record, as they provide a means of estimating loan demand and identifying lending opportunities. To understand small business/small farm demand, self-reported data on revenue size and geographic location from business entities are collected and published by Dun & Bradstreet. The demographic data should not be construed as defining an expected level of lending in a particular area or to a particular group of borrowers. The data, along with housing and economic conditions information, is used to establish performance context and evaluate Whitaker accordingly. Refer to Appendices C and E for explicit demographic data.

Loans are evaluated to determine the lending activity inside and outside Whitaker's AAs. In addition, loans inside the AA are evaluated based on the borrower and geographic income distribution for each AA. The distribution of HMDA-reportable loans by borrower income is assessed by comparing the percentage of loans originated to borrowers in each income category (low-, moderate-, middle-, and upper-income) with the percentage of families in each income category. The distribution of small business and small farm loans is assessed by comparing the percentage of loans originated to businesses or farms in each revenue category (less than or comparable to \$1.0 million and greater than \$1.0 million) to the percentage of total businesses or total farms in each revenue category.

The geographic distribution of HMDA-reportable loans is assessed by comparing the percentage of loans originated in each income category (low-, moderate-, middle-, and upper-income) to the percentage of owner-occupied units in each geographic income category. Small business and small farm loans are compared to the percentage of small businesses or small farms within each geographic income category.

Geographic distribution received more consideration in this evaluation than borrower distribution, since the overall percentage of LMI geographies was slightly greater than the overall percentage of LMI families.

Lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they impacted the outcome of the analyses.

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



Whitaker's lending performance was also compared to the performance of aggregate lenders in 2019, 2020, 2021, and 2022.<sup>3</sup> Aggregate lenders include all lenders required to report HMDA-reportable and CRA-reportable small business/small farm lending data within the respective AAs. Lending market share is also discussed to give a better understanding of where Whitaker ranks within the respective areas. For retail services, Whitaker's branch distribution analysis was conducted using data as of December 31, 2023.

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

To better understand AA community development and credit needs, several sources were utilized, including publicly accessible data, information submitted by Whitaker, and plans describing the community development environment in local markets. Three community contact interviews were conducted with representatives from two community foundations and an economic development organization operating inside Whitaker's AAs. These individuals have expertise in their respective fields and are familiar with the economic, social, and demographic characteristics and community development opportunities in the AA. Information obtained from these interviews helped establish a context for the communities in which Whitaker operates and gather information on its performance.

Community contacts identified economic distress and lack of safe affordable housing as the most critical problems across the AA; followed by the health and educational impact of the opioid epidemic. Other identified challenges included the need for reliable and affordable high-speed internet, financial literacy and homebuyer education, and access to investment capital. Lastly, the contacts identified several opportunities for bank participation. More detailed information obtained from individual community contacts is included in the "Description of the Institution's Operations" section for each full-scope AA.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

Whitaker's overall CRA performance is rated Outstanding. Details are provided below, including facts, data, and analyses used to form conclusions regarding the lending, investment, and service test performance ratings. Whitaker's CRA program includes a strategy to focus on meeting the credit and community development needs of its AAs. Whitaker continues to work

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<sup>3</sup> The CRA aggregate comparator for 2022 was not available at the time of this evaluation.

on ways to increase lending penetration across its AAs and strengthen community engagement to help identify unmet community development needs and find potential solutions including but not limited to implementing a software platform that provides automation of CRA data collection, maintenance, reporting, and review allowing the CRA Officer to effectively track, manage, and review data submitted for activity by branch location and individual employee activity.

### **Lending Test**

Whitaker's lending test performance is rated Outstanding. The overall geographic distribution of loans is good, with moderate gaps in lending. The overall penetration of loans among borrowers of different income levels is good; and the distribution to businesses and farms of different sizes is good. Whitaker is a leader in making community development loans. Whitaker's lending test performance is excellent in Nonmetropolitan Kentucky and adequate in the Lexington MSA.

While Whitaker's lending distribution by borrower income and geography is referenced throughout this report, detailed information about HMDA- and CRA-reportable loans can be found in Appendix D for full-scope and Appendix F for limited-scope AAs, respectively. In some AAs and product discussions, specific numbers are quoted from these tables to support relevant points; otherwise, general references are made about performance, and the reader should refer to the appendices for specific data.

### ***Lending Activity***

Whitaker's lending activity reflects a good responsiveness to the credit needs of its AAs, taking into consideration its strategic objectives, economic conditions, and competitive factors. During the evaluation period, a substantial majority of loans originated by volume and dollar amount were made in Whitaker's delineated AAs. There are no concentrations of lending outside the bank's delineated footprint, since Whitaker takes the entirety of the Lexington MSA.

As the data shows in the table below, Whitaker originated more small business-related loans by number and dollar amount than HMDA- and small farm-related loans; as a result, small business-related lending typically had a greater impact on lending ratings. Overall lending was considered responsive to credit needs in all AAs, commensurate with deposits, and no conspicuous gaps in lending activity by income category were identified. Detailed information about lending activity can be found in the full-scope section of this report.

### ***Assessment Area Concentration***

The following tables show the number and percentage of loans located inside and outside of Whitaker's AAs by loan type. As indicated below, Whitaker originated a substantial majority of the total loans by volume and by dollar amount to borrowers, businesses, and farms located within its AAs in 2019 through 2021 and in 2022.

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	35	97.2	\$1,801	98.4	1	2.8	\$30	1.6
Home Purchase - Conventional	425	93.0	\$48,390	89.6	32	7.0	\$5,624	10.4
Multi-Family Housing	24	100.0	\$26,705	100.0	0	0.0	\$0	0.0
Other Purpose Closed-End	37	92.5	\$1,906	84.0	3	7.5	\$363	16.0
Refinancing	302	93.8	\$34,356	92.1	20	6.2	\$2,934	7.9
<b>Total HMDA related</b>	<b>823</b>	<b>93.6</b>	<b>\$113,158</b>	<b>92.7</b>	<b>56</b>	<b>6.4</b>	<b>\$8,951</b>	<b>7.3</b>
Small Business	2,674	93.5	\$162,423	93.7	187	6.5	\$10,850	6.3
<b>Total Small Bus. related</b>	<b>2,674</b>	<b>93.5</b>	<b>\$162,423</b>	<b>93.7</b>	<b>187</b>	<b>6.5</b>	<b>\$10,850</b>	<b>6.3</b>
Small Farm	862	92.4	\$30,966	92.3	71	7.6	\$2,589	7.7
<b>Total Small Farm related</b>	<b>862</b>	<b>92.4</b>	<b>\$30,966</b>	<b>92.3</b>	<b>71</b>	<b>7.6</b>	<b>\$2,589</b>	<b>7.7</b>
<b>TOTAL LOANS</b>	<b>4,359</b>	<b>93.3</b>	<b>\$306,547</b>	<b>93.2</b>	<b>314</b>	<b>6.7</b>	<b>\$22,390</b>	<b>6.8</b>

Note: Affiliate loans not included

Whitaker originated 93.3% of its total loans by volume and 93.2% by dollar amount to borrowers, businesses, and farms located inside its AAs from 2019 through 2021. The increase in small business loans due to the bank's involvement with the Paycheck Protection Program (PPP) loans did not negatively impact AA concentration of small business loans inside the AA.

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	129	94.9	\$8,775	95.0	7	5.1	\$459	5.0
Home Purchase - Conventional	240	90.2	\$40,845	87.2	26	9.8	\$6,014	12.8
Multi-Family Housing	26	96.3	\$22,520	98.4	1	3.7	\$360	1.6
Other Purpose Closed-End	93	92.1	\$6,734	94.4	8	7.9	\$396	5.6
Refinancing	258	92.8	\$33,638	92.2	20	7.2	\$2,857	7.8
<b>Total HMDA related</b>	<b>746</b>	<b>92.3</b>	<b>\$112,512</b>	<b>91.8</b>	<b>62</b>	<b>7.7</b>	<b>\$10,086</b>	<b>8.2</b>
Small Business	608	94.0	\$63,883	92.8	39	6.0	\$4,973	7.2
<b>Total Small Bus. related</b>	<b>608</b>	<b>94.0</b>	<b>\$63,883</b>	<b>92.8</b>	<b>39</b>	<b>6.0</b>	<b>\$4,973</b>	<b>7.2</b>
Small Farm	216	90.0	\$14,705	87.2	24	10.0	\$2,157	12.8
<b>Total Small Farm related</b>	<b>216</b>	<b>90.0</b>	<b>\$14,705</b>	<b>87.2</b>	<b>24</b>	<b>10.0</b>	<b>\$2,157</b>	<b>12.8</b>
<b>TOTAL LOANS</b>	<b>1,570</b>	<b>92.6</b>	<b>\$191,100</b>	<b>91.7</b>	<b>125</b>	<b>7.4</b>	<b>\$17,216</b>	<b>8.3</b>

Note: Affiliate loans not included

Whitaker originated 92.6% of its total loans by volume and 91.7% by dollar amount to borrowers, businesses, and farms located inside its AAs in 2022.

### ***Distribution of Lending by Geographic Distribution and Borrower Income, Business and Farm Revenue Size***

The overall geographic distribution of loans reflects a good penetration throughout the AAs with a moderate level of lending gaps. The geographic distribution of small business and HMDA-reportable lending is good in Nonmetropolitan Kentucky and the Lexington MSA. Geographic distribution of small farm lending is good in Nonmetropolitan Kentucky and adequate in the

Lexington MSA. A moderate level of lending gaps was identified in Nonmetropolitan Kentucky and a significant level in the Lexington MSA.

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

Between April 13, 2020, through May 21, 2021, Whitaker facilitated 2,355 PPP loans totaling \$79.6 million. PPP loans are administered by the Small Business Administration (SBA) as part of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act). PPP loans are designed to help businesses retain workers and staff during the economic hardship resulting from the pandemic.<sup>4</sup> Of the total PPP loans, 2,191 (93.0%) loans totaling \$74.9 million (94.1%) were made in the bank's AAs. Consistent with information provided in the May 27, 2020, joint statement on CRA Consideration for Activities in Response to Coronavirus FAQs;<sup>5</sup> loans, including PPP loans, in amounts of \$1.0 million or less to for-profit businesses or to nonprofit organizations that are secured by nonfarm, non-residential real estate, are reported, and considered as small business loans under the retail lending test. Reported revenue was not available for most PPP loans given the program requirements; the impact of any large percentages of unknown revenues will be considered in this evaluation.

### *Community Development Loans*

Whitaker is a leader in making community development loans during the evaluation period. Whitaker originated or renewed 73 community development loans totaling approximately \$19.2 million. This volume of community development lending is considered excellent given the size and presence of the institution and community development lending opportunities in its AAs and represents a substantial increase by volume and dollar amount since the previous evaluation. Community development loans address a variety of expressed credit needs and are responsive to those needs. The following table reflects the total number community development loans by purpose, number, and dollar amount.

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<sup>4</sup>[FEMA Major Disaster Declarations: In March 2020, each county was designated as a major disaster area due to the COVID-19 pandemic](#)

<sup>5</sup> [May 27, 2020 - Frequently Asked Questions \(FAQs\) for Consideration for Activities in Response to the Coronavirus](#)

<b>Purpose of CD Loan</b>	<b>#</b>	<b>\$</b>
Revitalization / Stabilization	66	\$16,120,489
Economic Development	3	\$2,459,620
Community Services	3	\$496,748
Affordable Housing	1	\$125,000
<b>Total</b>	<b>73</b>	<b>\$19,201,857</b>
<i>Totals include loans that benefit broader regional area</i>		

PPP loans in amounts greater than \$1.0 million may be considered as community development loans if they also have a primary purpose of community development as defined under the CRA. Whitaker also had PPP loans originated in 2020 by Peoples, prior to the merger. These loans were not reported since Peoples was not a CRA reporter. Since these loans were not CRA reportable, they were considered as community development loans if they had a primary purpose of community development.

Whitaker originated 44 PPP loans totaling \$12.1 million large dollar PPP loans in its AAs (six PPP loans totaling \$7.1 million in the Lexington MSA and 38 PPP loans totaling \$5.0 million in Nonmetropolitan Kentucky). These loans represent approximately 63.0% of Whitaker's total community development lending by dollar amount and are considered responsive to credit needs of small businesses and helped to stabilize LMI and distressed-middle income geographies during the height of the COVID-19 emergency. An additional 10 revitalization/stabilization loans totaling \$3.8 million benefited Nonmetropolitan Kentucky.

Whitaker originated three economic development loans, totaling \$2.5 million in its AAs. These loans supported a Community Development Financial Institution (CDFI) in Lexington and an economic development association in Nonmetropolitan Kentucky. These loans helped to increase access to affordable housing in Lexington and attract and expand two businesses in Nonmetropolitan Kentucky.

Whitaker originated two community services loans, totaling \$496,748 that provided much needed access to health services to LMI individuals and families in the Lexington MSA and Nonmetropolitan Kentucky.

Whitaker originated a loan totaling \$125,000 to a national nonprofit affordable housing organization in Nonmetropolitan Kentucky.

Because Whitaker has been responsive to community development needs and opportunities, consideration was given to 12 PPP loans totaling \$220,369 that benefited the broader regional nonmetropolitan areas in Kentucky. These loans helped to stabilize contiguous LMI and distressed-middle income geographies during the COVID-19 emergency. Consideration was also given to a loan totaling \$51,748 to a local nonprofit that provides workforce development training and rides to work to LMI individuals who completed the training program to purchase a transport vehicle. Community contacts across AAs emphasized the need for small dollar loans

to help sustain and attract new businesses to the area and access to jobs. These loans represent approximately 1.4% of Whitaker’s total community development lending by dollar amount and are considered responsive to expressed needs across nonmetropolitan communities in Kentucky.

Of these qualified community development loans, 71.2% by volume and 51.1% by dollar amount were originated in Nonmetropolitan Kentucky, compared to the percentage of total lending at 77.8% and total deposits at 77.3%. Community contacts emphasized all aspects of affordable housing as a critical need across the AA and expressed the need for access to health-related services and capital for small businesses. Contacts also acknowledged the positive impact PPP loans had on local economies. Community development loans in Nonmetropolitan Kentucky address a wide array of expressed needs and are considered responsive to credit needs of LMI individuals and areas and small businesses. Therefore, Whitaker is a leader in making community development loans in Nonmetropolitan Kentucky. Approximately 11.0% by volume and 47.5% by dollar amount of community development loans were originated in the Lexington MSA, compared to total lending at 22.2% and total deposits at 22.7%. Whitaker makes a relatively high level of community development loans in the Lexington MSA.

More information on individual community development loans can be found in the full-scope AA sections of this report.

### *Flexible Lending Practices<sup>6</sup>*

In addition to PPP loans in amounts of \$1.0 million or less being considered as small business loans under the retail lending test; PPP loans also receive consideration under flexible lending practices. PPP loans are considered particularly responsive if made to small businesses with gross annual revenues of \$1.0 million or less or to businesses in LMI geographies or distressed nonmetropolitan middle-income geographies. The following table reflects the total number of PPP loans by AA and LMI tracts, number, and dollar amount:

Geographic Distribution Flexible Lending Practices - PPP Loans								
Assessment Area	Total #	# - %	Total # in LMI or Distressed Middle-Income Tracts	# - % in these Tracts	Total \$	\$ - %	Total \$ in LMI or Distressed Middle-Income Tracts	\$ - % in these Tracts
Nonmetropolitan Kentucky	1,759	74.7%	1,246	86.6%	\$49,487,638	62.2%	\$29,262,000	84.6%
Lexington-Fayette MSA	432	18.3%	112	7.8%	\$25,394,187	31.9%	\$4,656,000	13.5%
Outside AA	164	7.0%	80	5.6%	\$4,681,376	5.9%	\$660,000	1.9%
<b>Total</b>	<b>2,355</b>	<b>100.0%</b>	<b>1,438</b>	<b>100.0%</b>	<b>\$79,563,201</b>	<b>100.0%</b>	<b>\$34,578,000</b>	<b>100.0%</b>

Slightly more than 61.0% of total PPP loans by volume and 43.5% by dollar amount were originated in either LMI or distressed middle-income tracts. Community contacts emphasized

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

the need for access to capital for small businesses across the AAs. The qualitative impact of these loans in LMI and distressed middle-income areas supported Whitaker's overall lending test performance. Whitaker makes limited use of flexible lending practices in comparison to demographic comparators in serving AA credit needs in Nonmetropolitan Kentucky and the Lexington MSA.

More information on individual flexible lending programs can be found in the full-scope AA section of this report.

### **Investment Test**

Whitaker's performance under the investment test is rated High Satisfactory. Whitaker has a significant level of qualified community development investments and donations and is occasionally in a leadership position in Nonmetropolitan Kentucky and the Lexington MSA.

Whitaker has \$24.0 million in qualified community development investments. The following table reflects the total number of qualified investments by purpose, number, and dollar amount:

<b>Purpose of CD Investment</b>	<b>#</b>	<b>\$</b>
Community Services	36	\$17,205,952
Affordable Housing	11	\$6,783,509
<b>Total</b>	<b>47</b>	<b>\$23,989,461</b>
<i>Totals include qualified investments that benefit broader regional area</i>		

Whitaker obtained 10 new investments worth approximately \$7.3 million, representing 29.7% of total qualified investments. Whitaker holds 37 prior period investments with a current book value of approximately \$16.9 million, representing 70.3% of total investments. While this represents a significant increase by dollar amount since previous evaluation, the majority of Whitaker's qualified investments are prior period investments.

Qualified current period investments include two municipal bonds with a current book value of approximately \$2.3 million. These bonds benefited two school districts of which 50.0% or more of students qualify for the free- and reduced-price meals under the National School Lunch Program in Nonmetropolitan Kentucky and the Lexington MSA. The remaining eight new investments worth approximately \$4.9 million were mortgage-backed securities. Mortgage-backed securities helped support affordable single-family and multifamily housing for LMI individuals, seniors, and families in Nonmetropolitan Kentucky and the Lexington MSA. Qualified new investments represent 29.7% of total qualified investments.

Qualified prior period investments include 30 municipal bonds with a current book value of approximately \$13.6 million and three mortgage-backed securities with a current book value of approximately \$1.9 million that benefited Nonmetropolitan Kentucky and the Lexington MSA. Qualified prior period investments represent 64.6% of total qualified investments.

Because Whitaker has been responsive to community development needs and opportunities, consideration was given to four prior period municipal bonds that benefited the broader nonmetropolitan regional area of Kentucky (Corbin County) with a current book value of \$1.4 million. These investments benefited a school district of which 50.0% or more of students qualify for the free- and reduced-price meals. These qualified prior period investments represent 5.7% of total qualified investments.

Qualified investments also took the form of donations totaling \$1.0 million. This represents a significant increase by dollar amount since previous evaluation. Whitaker partners with a wide array of organizations and nonprofits to fund initiatives aimed at responding to community needs. These donations help provide a multitude of wraparound services to LMI individuals and families, revitalize and stabilize communities, affordable housing, and economic development activities. The following table reflects the total number community development donations by purpose, number, and dollar amount.

<b>Purpose of CD Donation</b>	<b>#</b>	<b>\$</b>
Community Services	818	\$968,861
Revitalization/Stabilization	15	\$37,915
Economic Development	2	\$25,350
Affordable Housing	8	\$7,761
<b>Total</b>	<b>843</b>	<b>\$1,039,887</b>
<i>Totals include donations that benefit broader regional area</i>		

Approximately 76.7% of Whitaker's small dollar donations by dollar amount benefited Nonmetropolitan Kentucky and 20.0% benefited the Lexington MSA.

Because Whitaker has been responsive to community development needs and opportunities, consideration was given to 22 small dollar donations totaling \$33,645 (3.3%). The largest donation totaling \$25,000 helped a nonprofit that works to combat population loss and drive economic growth in the Appalachian region. The remaining donations supported wraparound services targeted to LMI individuals, children, and families in the broader nonmetropolitan regional area of Kentucky.

Of total qualified investments and donations, 57.2% by dollar amount benefited Nonmetropolitan Kentucky, compared to the percentage of total lending at 77.8% and total deposits at 77.3%; and 32.4% by dollar amount benefited the Lexington MSA, compared to total lending at 22.2% and total deposits at 22.7%. Lastly, 10.4% of total qualified investments and donations benefited the broader regional nonmetropolitan Kentucky area. While this represents a significant increase by dollar amount since previous evaluation, Whitaker did not make use of complex investments (e.g., low-income housing tax credits or new market tax credits) to support community development initiatives; however, investing in municipal bonds and mortgage-backed securities designed to finance community development in underserved communities and address affordable housing are responsive to credit and community development needs across its AAs.



The majority of qualified investments were outstanding prior period commitments that do not have as much impact as new commitments. Whitaker has the capacity and opportunities to invest in more varied and complex investments to support community development initiatives. Community contacts emphasized all aspects of affordable housing as a critical need and indicated there are opportunities for financial institutions to collaborate with local officials to better address issues and challenges in its AAs. Whitaker's small dollar donations help provide access and support for a variety of wraparound services for LMI families and children, which is essential in its AAs which have significant challenges around poverty, unemployment, drug addiction, and the lack of educational attainment. Overall, qualified investments and donations exhibit good responsiveness to credit and expressed community development needs in Nonmetropolitan Kentucky and the Lexington MSA.

More information detailing specific investments and contributions can be found in the full-scope AA section of this report.

### **Service Test**

Whitaker's performance under the service test is rated Outstanding. Retail delivery systems are accessible, and Whitaker is a leader in providing community development services. Retail delivery systems are accessible in Nonmetropolitan Kentucky and the Lexington MSA. Whitaker is a leader in providing community development services in Nonmetropolitan Kentucky and provides an adequate level of community development services in the Lexington MSA.

### ***Retail Services***

All of Whitaker's ATMs are cash-only ATMs. Whitaker maintains its main office with an ATM, 39 branches with ATMs, and four branches without ATMs in its AAs. Since the previous evaluation, Whitaker opened one branch without an ATM and acquired eight branches with ATMs and one branch without an ATM in Nonmetropolitan Kentucky from the merger with Peoples on December 1, 2020.

Whitaker also maintains 11 stand-alone ATMs. Since the previous evaluation, Whitaker closed three standalone ATMs in Nonmetropolitan Kentucky. Whitaker also closed four standalone ATMs in the Lexington MSA. Two of these ATMs were in unknown-income tracts, and one was in a moderate-income tract in Lexington (Fayette County); the remaining ATM was in a moderate-income tract in Georgetown (Scott County).

Whitaker maintains 33 branches with ATMs, four branches without ATMs, and 10 stand-alone ATMs in Nonmetropolitan Kentucky. More information detailing specific retail services can be found in the full-scope AA section of this report.

Whitaker maintains seven branches with ATMs and one stand-alone ATM in the Lexington MSA. The main office and three branches are in Lexington (Fayette County). The main office and one branch are in upper-income tracts and two branches are in moderate-income tracts. The

remaining three branches are in Georgetown (Scott County). One branch is in a moderate-income tract and two are in middle-income tracts. The stand-alone ATM in Georgetown is in a community hospital in a moderate-income tract. Since the previous evaluation, Whitaker closed a branch with an ATM in a mall in Lexington in a middle-income tract on July 21, 2023.

Overall Whitaker's record of opening branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or LMI individuals. Retail delivery systems are accessible to Whitaker's geographies and individuals of different income levels in Nonmetropolitan Kentucky and the Lexington MSA. Nearly 29.0% of Whitaker's branches serve LMI geographies, compared to 31.1% of total LMI tracts across the AAs.

The geographic distribution of Whitaker's branches as of December 31, 2023, is shown in the table below.

Geographic Distribution of Branches and ATMs

Exam: Whitaker Bank, Inc. 2023  
Assessment Area(s): Entire Institution

Analysis Year: 2022

Tract Income Levels	BRANCHES							ATMS								DEMOGRAPHICS*							
	Total Branches		Opened	Closed**	Drive-Thru	Extended Hours	Weekend Hours	Total ATMs		Full Service				Cash Only				Census Tracts		Households	Total Businesses		
	#	%	#	#	#	#	#	Total	%	Total	%	Opened	Closed	Total	%	Opened	Closed	#	%	%	%		
Low	Total	3	6.7%	2	0	3	3	3	Total	5	9.6%	0	0.0%	0	0	5	9.6%	2	0	16	4.7%	4.1%	3.1%
	DTO	0		0	0	0		Stand Alone	2		0		0	0	2		0	0					
	LS	0		0	0																		
Moderate	Total	10	22.2%	1	0	8	9	3	Total	9	17.3%	0	0.0%	1	1	9	17.3%	0	2	91	26.6%	24.2%	20.5%
	DTO	0		0	0	0		Stand Alone	1		0		0	0	1		0	2					
	LS	0		0	0																		
Middle	Total	21	46.7%	6	1	18	18	9	Total	23	44.2%	0	0.0%	0	0	23	44.2%	5	3	141	41.2%	43.1%	40.5%
	DTO	0		0	0	0		Stand Alone	4		0		0	0	4		0	2					
	LS	0		0	0																		
Upper	Total	11	24.4%	1	0	10	10	7	Total	15	28.8%	0	0.0%	0	0	15	28.8%	1	1	91	26.6%	27.7%	33.2%
	DTO	0		0	0	0		Stand Alone	4		0		0	0	4		0	1					
	LS	0		0	0																		
Unknown	Total	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	2	3	0.9%	0.8%	2.7%
	DTO	0		0	0	0		Stand Alone	0		0		0	0	0		0	2					
	LS	0		0	0																		
Totals	Total	48	100.0%	10	1	39	40	22	Total	52	100.0%	0	0.0%	1	1	52	100.0%	8	8	342	100.0%	100.0%	100.0%
	DTO	0		0	0	0		Stand Alone	11		0		0	0	11		0	7					
	LS	0		0	0																		

DTO - Drive Thru Only  
LS - Limited Service  
Shaded rows indicate totals; unshaded rows are a subset of shaded rows  
\*Based on 2020 census data  
\*\*Closed branches are only included in the "Closed" columns and are not included in any other totals  
LPOs not included in totals.

Banking services do not vary in a way that inconveniences any portion of Whitaker's AAs. Whitaker's banking centers are generally open six days a week and provide lobby and/or drive-thru services full days Monday through Thursday (8:00 a.m. to 5:00 p.m.), Friday (8:00 a.m. to 6:00 p.m.) and half days on Saturday (9:00 a.m. – 12:00 p.m.). Thirty-nine (39) offices offer drive-thru services, 40 offices offer extended hours until 6:00 p.m. Twenty-two (22) offices offer weekend hours. While only about half of the branches offer weekend hours, the majority of branches, including but not limited to, those in LMI and distressed middle-income tracts offer extended hours and ATMs to access cash.

Whitaker offers a variety of alternative delivery systems to supplement its branch network. Alternative delivery systems primarily consist of website ([whitakerbank.com](http://whitakerbank.com)) and mobile banking applications that allow for standard online banking capabilities (Mobile Deposit, BillPay, security alerts/notifications, Zelle, eStatements, ApplePay and GooglePay). Whitaker has seen an upward trend of 82.0% of web logins and 64.0% of app logins from 2019 through 2022, especially in mobile banking, mobile deposits, and debit card alerts, respectively.

Whitaker also offers 24-hour telephone banking line that provides customers with deposit and loan account information, as well as funds transfer and loan payment capabilities. The website, mobile banking, and telephone banking services are available to all bank customers regardless of location or income.

In response to the COVID-19 emergency, Whitaker provided uninterrupted service to its retail customers by continuing to provide full-service retail banking via drive-thru service, curbside banking, and lobby transactions by appointments. Customers who did not currently use the bank's online or electronic services were assisted in signing up and accessing their accounts electronically.

### ***Community Development Services***

Whitaker is a leader in providing community development services throughout its AA, with 4,080 hours of community development services supporting various service activities during the evaluation period. Total community development service hours equate to 2.0 annualized persons (ANP).<sup>7</sup> Whitaker is a leader in providing community development services in Nonmetropolitan Kentucky and provides an adequate level of community development services in the Lexington MSA.

The following table provides a breakdown of qualified community development services by community development purpose. Employees were involved with organizations and activities that promote or facilitate community services targeted to LMI individuals, economic development by financing small businesses, affordable housing; and to a lesser extent, revitalize/stabilize LMI communities.

<b>Purpose of CD Service</b>	<b># Services</b>	<b># Organizations</b>	<b># Employees</b>	<b># Hours</b>
Community Services	474	74	55	3,134
Economic Development	18	5	6	667
Affordable Housing	24	3	5	223
Revitalization/ Stabilization	1	1	1	56
<b>Total</b>	<b>517</b>	<b>83</b>	<b>67</b>	<b>4,080</b>
<i>Totals include services that benefit broader regional area</i>				

Whitaker's directors, officers, and staff members provided their financial expertise to the community by serving on boards and committees, providing technical assistance, and/or conducting financial literacy training.

Because Whitaker has been responsive to community development needs and opportunities, consideration was given to 14 community development services provided in a broader regional area. Four employees assisted four organizations totaling 211 hours of service to organizations with a community development purpose. These employees provided eight hours of financial

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<sup>7</sup> Annualized Persons (ANP): Number CD qualified service hours divided by 2,000 work hours in a year

literacy training to potential entrepreneurs and 203 hours serving on boards and committees. This represents 5.2% of total service hours.

Approximately 88.1% of Whitaker's total community development services hours benefited Nonmetropolitan Kentucky, compared to the percentage of total branches in the AA at 84.1%. Total community development service hours equate to 1.8 ANP. In the Lexington MSA, 6.7% of total service hours benefited the AA, compared to the percentage of total branches at 15.9%. Total community development service hours equate to 0.2 ANP.

Community development services include the following:

*Financial Education* – Whitaker uses a program/workbook from the Federal Trade Commission (FTC), Protecting America's Consumer to teach LMI at-risk individuals and students about managing money, credit, loans and debt as well as scams and identity theft, and the FDIC's Money Smart for Young Adults program, and American Bankers Association's (ABA) website materials for Teach Children to Save Day (TCSD), Money Talks – Money Doesn't Grow on Trees, Needs Versus Wants coloring book for younger children and Safe Banking for Seniors. During TCSD, *Ella Earns Her Own Money*, a Cloverleaf *Money Basic's* book is presented in various elementary schools.

Whitaker uses the following in-house developed presentations: Preventing Financially Related Elder Abuse, a First Time Home Buyer education program and Whitaker hosted a summer camp bank day program for students participating in the Kids Make It program. Additionally, events were held at the branch level, providing money saving games/programs for children and parents.

Whitaker had to stop offering in-person financial education events in 2020 through mid-year 2022 due because of COVID-19 restrictions; however, Whitaker resumed in-person training events mid-year 2022. Most financial literacy training is conducted by Whitaker's management and market team members; however, multiple staff participate in financial literacy events.

Whitaker also offers an online education tool module on its website that covers fraud prevention, scams, wireless and mobile device security, consumer awareness, and identity theft, which is accessible across the bank's AAs, including but not limited to LMI and distressed and underserved middle-income tracts.

*Board and Committee Memberships* – Whitaker's officers, managers, and CD lenders provided financial expertise through their involvement with community development organizations throughout the AAs by serving as executive directors, presidents, board members, loan committee members, or treasurers.

*Technical Assistance* – Whitaker's employees provided technical assistance to community development and nonprofit organizations. Technical assistance included fund raising, budgeting, reviewing loan application requests, and developing tools and strategies to help

alleviate poverty.

#### **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The Federal Reserve Bank of Cleveland conducted a fair lending analysis performed under Regulation B – Equal Credit Opportunity Act and Fair Housing Act requirements and was conducted concurrently with this CRA evaluation. Based on findings from that examination, no evidence of discriminatory or other illegal credit practices was identified. Thereby, it was determined that an adjustment to the CRA Performance Evaluation rating is not warranted.

**NONMETROPOLITAN AREA**  
*(Full-scope Review)*

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

Nonmetropolitan Kentucky consists of entireties of Bath, Boyle, Breathitt, Clay, Estill, Fleming, Franklin, Garrard, Jackson, Knott, Knox, Laurel, Lee, Leslie, Letcher, Madison, Menifee, Mercer, Montgomery, Nicholas, Owsley, Perry, Powell, Rockcastle, Rowan, Whitley, and Wolfe counties in Kentucky. Since the previous evaluation, Whitaker added Boyle County when it opened a branch. The Census Bureau released new size and population data from the 2020 Census on August 12, 2021. Due to these changes this AA was comprised of the following tracts for this analysis. See Appendix B for AA maps and Appendix C for additional demographic data.

<b>Tract Income Level</b>	<b>2019</b>	<b>2020-2021</b>	<b>2022</b>
	<b>Number of Tracts</b>	<b>Number of Tracts</b>	<b>Number of Tracts</b>
Low	2	2	7
Moderate	41	41	56
Middle	76	80	88
Upper	26	29	53
Unknown	0	0	0
<b>Total</b>	<b>145</b>	<b>152</b>	<b>204</b>

As a result of the branch opening, the AA gained four middle-income tracts and three upper-income tracts in 2020. Based on 2020 Census data, the AA gained five low-income tracts, 15 moderate-income tracts, eight middle-income tracts, and 24 upper-income tracts in 2022.

Distressed and underserved middle-income geographies are designated by the agencies<sup>8</sup> in accordance with interagency CRA regulations. The designations continue to reflect local economic conditions, including unemployment, poverty, and population change. The criteria for designating these areas are available on the Federal Financial Institutions Examination Council's (FFIEC) website.<sup>9</sup> Refer to the table below for counties with distressed or underserved middle-income tracts in Nonmetropolitan Kentucky during the evaluation period.

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<sup>8</sup> The Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, and Office of the Comptroller

<sup>9</sup> [FFIEC – Distressed or Underserved nonmetropolitan middle-income geographies](#)

Counties with Distressed or Underserved Middle-Income Geographies																
Assessment Area: Nonmetropolitan Kentucky																
Area	Poverty				Unemployment				Population Loss				Underserved (Remote Rural)			
	2019	2020	2021	2022	2019	2020	2021	2022	2019	2020	2021	2022	2019	2020	2021	2022
Bath	X	X		X	X	X										
Breathitt	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X
Clay	X	X	X	X	X	X			X	X	X	X	X	X	X	X
Estill	X	X	X	X												
Jackson	X	X	X	X	X	X							X	X	X	X
Knott	X	X	X	X	X	X							X	X	X	X
Knox	X	X	X	X	X	X										
Laurel	X	X	X													
Lee	X	X	X		X	X							X	X	X	
Leslie	X	X	X	X	X	X		X					X	X	X	X
Letcher	X	X	X	X	X	X							X	X	X	X
Menifee	X	X	X	X	X	X										
Montgomery					X											
Nicholas													X	X	X	X
Owsley	X	X	X	X	X	X							X	X	X	X
Perry	X	X	X	X	X	X							X	X	X	X
Powell	X	X	X	X	X											
Rockcastle	X	X	X	X												
Rowan	X	X	X	X												
Whitley	X	X	X	X												

Source: FFIEC

Source: FFIEC

In 2019 58 (76.0%), in 2020 53 (66.0%), in 2021 54 (68.0%), and in 2022 (51.0%) of middle-income tracts were designated as distressed due to poverty, unemployment, population loss or underserved. Revitalization or stabilization activities in these geographies are eligible to receive CRA consideration.

As of June 30, 2022, the Federal Deposit Insurance Corporation (FDIC) Summary of Deposits report, ranked Whitaker first among 39 financial institutions in the Nonmetropolitan Kentucky counties in which the bank has branches with 14.3% of the deposit market share, compared to second ranked Community Trust Bank with 13.6% and third ranked The Farmers National Bank of Danville with 7.5% of the deposit market share. Whitaker ranked second among 46 financial institutions within its entire Nonmetropolitan Kentucky AA with 11.9% of the deposit market share, compared to first ranked Community Trust Bank with 13.0% of the deposit market share. Deposits in this AA accounted for 77.3% of Whitaker's total deposits.

The 2022 HMDA peer market data shows that Whitaker ranked third among 337 HMDA reporters in Nonmetropolitan Kentucky having originated 632 loans. The top two HMDA lenders in this market, Community Trust Bank originated 851 loans and Rocket Mortgage, LLC originated 716 loans. Whitaker ranked 11<sup>th</sup> among HMDA reporters in this market in 2021, and 16<sup>th</sup> in 2020 and 2019.

Whitaker ranked fifth among 97 CRA reporters serving the Nonmetropolitan Kentucky counties in 2022 having originated 707 loans. The top four CRA reporters in this market, American Express National Bank originated 2,539 loans, Synchro Bank originated 1,361 loans, JP Morgan Chase Bank National Association originated 933 loans, and US Bank National Association originated 735 loans. Whitaker ranked second among CRA reporters in this market in 2021, third in 2020, and fourth in 2019.

## **Community Contacts**

Three community contact interviews were conducted as part of this evaluation to provide supplemental information regarding the area's credit needs and context to demographic and economic conditions of the local community. The first interview was with a representative from an economic development organization that serves Eastern Kentucky. The contact stated that the collapse of the coal industry has led to economic distress, indicating that nearly 45.0% of Appalachian counties with the most severe economic distress are in Eastern Kentucky, which is notable considering Kentucky only comprises 13.0% of the entire Appalachian region. The contact stated a major challenge in the region is a weak labor force despite a significant prime age working population. The contact indicated the current opioid epidemic prevalent throughout Appalachia plays a major role in public health and employment, and that all these factors lead to the region's average life expectancy being about six years less than the average American and underemployment. Lastly, the contact stated this area has incredibly poor broadband internet availability, which directly affects community development and employment opportunities. The contact commended area banks for being involved in the community and dependable partners that assist in emergencies and provide services benefiting the community. However, the contact also indicated there are opportunities for local financial institutions to participate on task forces and advocate for improved broadband infrastructure that is desperately needed.

The second contact was with a representative from a regional foundation that works to increase charitable giving and philanthropy throughout Central Appalachia (Eastern Kentucky). The contact stated that Central Appalachia continues to struggle with population loss, particularly the loss in prime working age residents, as a result of the decline in the coal industry, the opioid epidemic, and lack of safe and affordable housing. Central Appalachia tends to have the highest poverty rates within Appalachia, along with weak educational attainment and poor health outcomes which represent significant economic development challenges. The contact believes that while government assistance programs are insufficient to lift low-income recipients out of poverty, these programs also help keep recipients from sinking into deep poverty. The contact expressed there is a lack of access to financial services in the community and indicated there are opportunities for financial institutions to collaborate with local officials to better address the area's issues and challenges.

The third interview was with a representative from a community foundation that funds a multitude of wraparound services to LMI individuals and families. The contact stated lack of access to opportunities, education, healthcare, and affordable housing are key factors that contribute to generational poverty in Eastern Kentucky. In the last year, food insecurity greatly increased due to high inflation and the end of multiple pandemic-era assistance programs. The opioid epidemic and the decline of coal mining industry are major contributors to the increase in area homelessness and unemployment. Also, the unfounded fear of losing unemployment benefits may be keeping many unemployed workers from seeking a job or going back to work. The contact stated there is a lack of opportunity and available capital for small area businesses, which prevents new businesses from opening and existing businesses from staying in business.



or expanding. Local financial institutions need to be more accessible; LMI and unbanked individuals tend to avoid banks due to their fear of being charged excessive fees or not being approved for a checking and/or savings account or loan. The contact stated that financial literacy outreach and education is needed for LMI consumers and small business owners.

### Population Characteristics

Population Change Assessment Area: Nonmetropolitan Kentucky					
Area	2015 Population	2020 Population	Percent Change – 2015 to 2020	2022 Population	Percent Change – 2020 to 2022
Bath County	11,978	12,750	6.4%	12,829	0.6%
Boyle County	29,388	30,614	4.2%	30,904	0.9%
Breathitt County	13,591	13,718	0.9%	13,351	-2.7%
Clay County	21,300	20,345	-4.5%	19,913	-2.1%
Estill County	14,476	14,163	-2.2%	14,044	-0.8%
Fleming County	14,544	15,082	3.7%	15,288	1.4%
Franklin County	49,778	51,541	3.5%	51,607	0.1%
Garrard County	16,976	16,953	-0.1%	17,589	3.8%
Jackson County	13,357	12,955	-3.0%	12,973	0.1%
Knott County	16,000	14,251	-10.9%	13,874	-2.6%
Knox County	31,809	30,193	-5.1%	29,791	-1.3%
Laurel County	59,751	62,613	4.8%	62,885	0.4%
Lee County	7,119	7,395	3.9%	7,261	-1.8%
Leslie County	10,997	10,513	-4.4%	10,093	-4.0%
Letcher County	23,671	21,548	-9.0%	20,893	-3.0%
Madison County	85,838	92,701	8.0%	95,187	2.7%
Menifee County	6,343	6,113	-3.6%	6,250	2.2%
Mercer County	21,342	22,641	6.1%	22,902	1.2%
Montgomery County	27,167	28,114	3.5%	28,367	0.9%
Nicholas County	7,075	7,537	6.5%	7,805	3.6%
Owsley County	4,616	4,051	-12.2%	3,929	-3.0%
Perry County	28,041	28,473	1.5%	27,361	-3.9%
Powell County	12,447	13,129	5.5%	13,083	-0.4%
Rockcastle County	16,942	16,037	-5.3%	16,242	1.3%
Rowan County	23,608	24,662	4.5%	24,388	-1.1%
Whitley County	35,794	36,712	2.6%	36,873	0.4%
Wolfe County	7,261	6,562	-9.6%	6,400	-2.5%
<b>Assessment Area</b>	<b>611,209</b>	<b>621,366</b>	<b>1.7%</b>	<b>622,082</b>	<b>0.1%</b>
<b>Kentucky</b>	<b>4,397,353</b>	<b>4,505,836</b>	<b>2.5%</b>	<b>4,512,310</b>	<b>0.1%</b>
Source: 2011-2015 U.S. Census Bureau: American Community 2020 U.S. Census Bureau Decennial Census U.S. Census Bureau Vintage 2022 Population Estimates for the United States and States					

- From 2015 through 2022 the AA and Kentucky saw gains in population at 1.8% and 2.6%, respectively. During this time, Madison and Nicholas counties saw the biggest gains in

population at 10.9% and 10.3%, respectively compared to Owsley and Knott counties which saw the biggest declines in population at 14.9% and 13.3%, respectively.

- While the overall AA population increased, counties in the AA with decreasing population could experience increased economic pressure on the workforce.
- 78.2% of the AA population was 18 years of age or older, the legal age to enter into a contract.
- The majority of the AA population (50.4%) was between the ages of 25 and 64, which is the prime-working age.
- 16.6% of the population in the AA was age 65 and over, compared to 16.2% in Kentucky.
- A higher elderly population may affect economic growth and the ability of government and communities to provide adequate resources for older adults, including but not limited to healthcare services.
- 26.2% of the AA's population reside in LMI tracts.
- According to Census data, Richmond (Madison County) is the largest city in the AA with 34,585 residents, and its population increased by 10.3% between 2010 and 2021. Richmond is the seventh most populous city in Kentucky.<sup>10</sup> By contrast, Booneville is the most populous municipality in Owsley County with only 157 residents; however, its population increased by 93.8% between 2010 and 2021.<sup>11</sup>

## Income Characteristics

Borrower Income Levels														
Assessment Area: Nonmetropolitan Kentucky														
FFIEC Estimated Median Family Income			Low			Moderate			Middle			Upper		
Year	\$	% Change	0	-	49.9%	50%	-	79.9%	80%	-	119.9%	120%	-	& above
2019	\$49,800		0	-	\$24,899	\$24,900	-	\$39,839	\$39,840	-	\$59,759	\$59,760	-	& above
2021	\$51,500	3.4	0	-	\$25,749	\$25,750	-	\$41,199	\$41,200	-	\$61,799	\$61,800	-	& above
2021	\$52,600	2.1	0	-	\$26,299	\$26,300	-	\$42,079	\$42,080	-	\$63,119	\$63,120	-	& above
2022	\$61,700	19.8	0	-	\$30,849	\$30,850	-	\$49,359	\$49,360	-	\$74,039	\$74,040	-	& above
Source: 2020-2022 FFIEC Census Data														

Source: 2020-2022 FFIEC Census Data

- During the evaluation period, MFI in the AA increased by 23.9%.
- According to 2020 U.S. Census data, AA MFI at \$53,796 is 1.2 times lower than Kentucky at \$65,893.
- Minimum wage for 2023 in Kentucky is \$7.25 per hour or \$15,080 annually. Kentucky aims to raise the minimum wage with staggered increases over the next five years, bringing the minimum wage up to \$15 per hour by July 2028. The Federal minimum wage is \$7.25 per hour and has remained stagnant since 2009.

<sup>10</sup> [U.S. Census Bureau QuickFacts - Richmond](#)

<sup>11</sup> [Kentucky Secretary of State - Booneville](#)

Poverty Rates			
Assessment Area: Nonmetropolitan Kentucky			
Area	2019	2020	2021
Bath County	19.4	22.5	20.6
Boyle County	15.5	14.0	15.5
Breathitt County	29.2	27.9	31.0
Clay County	32.6	37.3	35.9
Estill County	22.7	20.6	22.6
Fleming County	21.1	14.6	17.4
Franklin County	11.5	12.8	13.3
Garrard County	15.7	14.0	14.4
Jackson County	27.8	24.0	25.2
Knott County	30.5	27.7	32.0
Knox County	31.5	27.8	35.1
Laurel County	21.4	17.9	19.5
Lee County	34.9	32.1	33.5
Leslie County	32.3	25.8	29.8
Letcher County	28.9	24.4	29.1
Madison County	17.7	15.5	16.6
Menifee County	26.1	22.7	27.8
Mercer County	13.8	13.1	12.8
Montgomery County	15.8	15.7	16.3
Nicholas County	17.3	16.8	16.5
Owsley County	35.5	30.6	35.6
Perry County	24.2	22.0	29.9
Powell County	21.5	20.5	22.8
Rockcastle County	21.0	22.4	21.3
Rowan County	23.3	24.4	20.9
Whitley County	22.6	21.7	27.6
Wolfe County	30.1	29.7	29.0
<b>Kentucky</b>	<b>16.0</b>	<b>14.9</b>	<b>16.3</b>
<b>United States</b>	<b>12.3</b>	<b>11.9</b>	<b>12.8</b>
Source: U.S. Census Bureau Small Area Income and Poverty Estimates Program			

- During this period, poverty rates in Breathitt, Clay, Knott, Knox, Lee, Leslie, Letcher, Menifee, Owsley, and Wolfe counties were substantially higher than poverty rates in Kentucky and the United States. These counties had poverty rates that were more than two times higher than the state and national averages.
- Of the 160,300 families in the AA, 40.7% are designated as LMI with 17.3% living below poverty; compared to 39.5% designated as LMI with 12.3% living below poverty across Kentucky.

- Of the 238,523 households in the AA, 22.8% are below the poverty level and 2.3% receive public assistance; compared to 16.5% of households across Kentucky that are below the poverty level.
- Supplemental Nutrition Assistance Program (SNAP) helps LMI individuals and families, the elderly, and the working poor purchase food and reduce food insecurity and may free up resources for other necessities, such as clothing, housing, and medical expenses. The table below shows the percent of the population by county that received SNAP benefits in 2020.

<b>SNAP Benefits</b>	
<b>Assessment Area: Nonmetropolitan Kentucky</b>	
<b>Area</b>	<b>2020</b>
Bath County	19.9%
Boyle County	11.8%
Breathitt County	27.7%
Clay County	33.7%
Estill County	23.7%
Fleming County	14.2%
Franklin County	9.8%
Garrard County	13.1%
Jackson County	24.7%
Knott County	30.3%
Knox County	33.8%
Laurel County	19.7%
Lee County	29.1%
Leslie County	28.7%
Letcher County	24.1%
Madison County	10.2%
Menifee County	21.7%
Mercer County	9.1%
Montgomery County	14.4%
Nicholas County	15.0%
Owsley County	38.4%
Perry County	26.2%
Powell County	22.9%
Rockcastle County	18.7%
Rowan County	14.9%
Whitley County	22.1%
Wolfe County	35.6%
<i>Source: Federal Reserve Economic Data (FRED) maintained by the Federal Reserve Bank of St. Louis</i>	

- Corresponding with poverty rates, Breathitt, Clay, Knott, Knox, Lee, Leslie, Owsley, and Wolfe counties had the highest percent of the population receiving SNAP benefits, and Franklin and Mercer counties had the lowest.

### Housing Characteristics

Housing Cost Change						
Assessment Area: Nonmetropolitan Kentucky						
Area	Median Housing Value			Median Gross Rent		
	2015	2020	Percent Change	2015	2020	Percent Change
Bath County	\$73,500	\$83,900	14.1%	\$589	\$496	-15.8%
Boyle County	\$132,500	\$144,000	8.7%	\$637	\$715	12.2%
Breathitt County	\$47,500	\$53,000	11.6%	\$493	\$473	-4.1%
Clay County	\$56,300	\$61,300	8.9%	\$473	\$535	13.1%
Estill County	\$71,400	\$78,200	9.5%	\$545	\$610	11.9%
Fleming County	\$86,700	\$91,100	5.1%	\$497	\$588	18.3%
Franklin County	\$137,500	\$149,900	9.0%	\$687	\$792	15.3%
Garrard County	\$128,500	\$144,900	12.8%	\$630	\$718	14.0%
Jackson County	\$65,900	\$83,100	26.1%	\$523	\$526	0.6%
Knott County	\$57,900	\$52,300	-9.7%	\$479	\$509	6.3%
Knox County	\$78,400	\$87,000	11.0%	\$545	\$551	1.1%
Laurel County	\$94,400	\$116,300	23.2%	\$579	\$680	17.4%
Lee County	\$67,700	\$65,800	-2.8%	\$435	\$504	15.9%
Leslie County	\$45,500	\$69,000	51.6%	\$438	\$491	12.1%
Letcher County	\$56,300	\$54,700	-2.8%	\$531	\$529	-0.4%
Madison County	\$144,800	\$161,400	11.5%	\$647	\$728	12.5%
Menifee County	\$78,100	\$83,200	6.5%	\$511	\$592	15.9%
Mercer County	\$133,600	\$148,900	11.5%	\$580	\$622	7.2%
Montgomery County	\$114,000	\$124,600	9.3%	\$646	\$697	7.9%
Nicholas County	\$83,900	\$86,500	3.1%	\$487	\$565	16.0%
Owsley County	\$69,800	\$67,400	-3.4%	\$351	\$325	-7.4%
Perry County	\$71,200	\$78,900	10.8%	\$535	\$703	31.4%
Powell County	\$76,600	\$105,000	37.1%	\$543	\$693	27.6%
Rockcastle County	\$73,900	\$88,500	19.8%	\$522	\$573	9.8%
Rowan County	\$115,300	\$126,900	10.1%	\$620	\$648	4.5%
Whitley County	\$77,900	\$104,200	33.8%	\$573	\$610	6.5%
Wolfe County	\$52,700	\$66,300	25.8%	\$489	\$390	-20.2%
<b>Kentucky</b>	<b>\$123,200</b>	<b>\$147,100</b>	<b>19.4%</b>	<b>\$675</b>	<b>\$783</b>	<b>16.0%</b>
Source: 2011-2015 U.S. Census Bureau: American Community Survey						
2016-2020 U.S. Census Bureau: American Community Survey						

- From 2015 to 2021, median housing values in Knott, Lee, Letcher, and Owsley counties decreased, while the median housing values throughout the rest of the AA increased between 3.1% to 51.6%, compared to 19.4% in Kentucky. Overall, housing remained affordable across the AA since MFI kept pace with home price growth, except in Leslie,

Powell, Whitley, Jackson, and Wolfe counties.

- Based on 2020 Census data, the affordability ratio<sup>12</sup> was 39.7 in the AA compared to 35.5 in Kentucky. Housing was generally more affordable across the AA than in other parts of Kentucky. Knott and Letcher counties had the highest affordability ratios at 62.2 and 60.7, respectively, and Madison County had the least affordable housing with an affordability ratio at 32.0.
- From 2015 to 2021, median gross rents in Wolfe, Bath, Owsley, Breathitt, and Letcher counties decreased, while the median gross rents throughout the rest of the AA increased between 0.6% to 31.4%. The rise in median gross rents indicates the need for more affordable housing. According to 2020 Census data, 34.4% of all renters in the AA had rental costs that were greater than 30.0% of their income.
- According to HUD's 2022 Fair Market Rents (FMR) data,<sup>13</sup> the average rent for a two-bedroom unit in Madison County is \$732 and the average rent for a two-bedroom unit in Owsley County is \$674.
- With Kentucky's minimum wage at \$7.25, renters across Kentucky can only afford \$377 in monthly rent. The typical minimum wage worker cannot afford rent for a FMR two-bedroom apartment or would have to work over 80 hours to afford a modest two-bedroom apartment in this AA.
- According to the National Low Income Housing Coalition,<sup>14</sup> full-time workers must earn at least \$17.90 an hour (\$37,232 annual salary) in Kentucky to afford a two-bedroom rental apartment, which is more than double the minimum wage in the state. Rents continue to increase nationwide; currently the national average rent is \$1,486 a month, which requires workers to earn a minimum wage of \$28.58 (\$59,446 annual salary).
- There are 260,529 housing units in the AA, of which 59.2% are owner occupied, 27.3% are rental and 13.5% are vacant; consequently, there are more households who own their homes than there are renters. Only 3.1% of total housing units are in low-income tracts and 47.0% of the housing units are owner-occupied and 53.0% are either rental or vacant. Only 25.1% of total housing units are in moderate-income tracts and 56.4% of the housing units are owner-occupied and 43.6% are either rental or vacant. With 40.8% of housing units across the AA being either rental or vacant, there may be limited opportunities to originate mortgage loans, particularly in moderate-income tracts.
- The median age of housing stock across the AA, including in LMI tracts is 42 years old, and 11.2% of housing units were built prior to 1950.

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<sup>12</sup> The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered.

<sup>13</sup> [HUD's Fair Market Rents – Final FY2022](#)

<sup>14</sup> [National Low Income Housing Coalition-Kentucky](#)

Housing Cost Burden						
Assessment Area: Nonmetropolitan Kentucky						
Area	Cost Burden – Owners			Cost Burden – Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Bath County	61.7%	18.8%	15.1%	44.6%	42.1%	28.7%
Boyle County	66.9%	20.9%	19.4%	75.8%	37.0%	42.3%
Breathitt County	39.9%	12.9%	16.6%	40.5%	7.8%	28.2%
Clay County	39.1%	9.9%	18.4%	47.2%	5.0%	29.5%
Estill County	47.2%	29.7%	20.9%	60.9%	7.1%	34.6%
Fleming County	46.2%	22.9%	14.8%	62.7%	8.5%	31.3%
Franklin County	58.7%	28.1%	14.7%	78.2%	26.5%	33.9%
Garrard County	50.7%	20.8%	18.0%	61.4%	13.6%	37.3%
Jackson County	51.3%	29.7%	22.1%	50.7%	5.4%	27.9%
Knott County	43.7%	11.5%	16.7%	54.5%	19.7%	38.3%
Knox County	39.3%	11.2%	15.7%	47.9%	23.6%	33.1%
Laurel County	50.3%	24.0%	17.5%	60.7%	35.2%	37.5%
Lee County	42.2%	18.9%	19.7%	39.8%	20.0%	31.3%
Leslie County	36.4%	17.9%	21.1%	36.8%	0.0%	24.2%
Letcher County	40.2%	18.1%	19.1%	55.8%	13.3%	34.0%
Madison County	52.1%	22.6%	15.0%	78.4%	16.4%	41.0%
Menifee County	43.7%	18.0%	16.7%	39.4%	14.3%	15.8%
Mercer County	56.8%	32.7%	16.7%	70.9%	12.5%	37.3%
Montgomery County	54.8%	27.6%	19.4%	66.3%	13.4%	29.4%
Nicholas County	52.2%	17.2%	14.1%	55.3%	39.3%	36.5%
Owsley County	50.0%	27.3%	22.6%	38.2%	12.3%	25.6%
Perry County	39.6%	13.6%	15.1%	47.8%	16.9%	27.7%
Powell County	65.0%	24.0%	17.5%	49.4%	34.4%	35.6%
Rockcastle County	49.6%	36.2%	20.8%	54.7%	12.3%	32.6%
Rowan County	37.7%	22.3%	14.8%	66.4%	44.3%	41.6%
Whitley County	45.5%	15.9%	15.8%	60.5%	24.6%	32.8%
Wolfe County	28.8%	29.3%	20.2%	64.1%	0.0%	45.2%
<b>Assessment Area</b>	<b>47.0%</b>	<b>21.6%</b>	<b>17.1%</b>	<b>61.9%</b>	<b>22.1%</b>	<b>35.4%</b>
<b>Kentucky</b>	<b>53.3%</b>	<b>24.9%</b>	<b>16.6%</b>	<b>67.6%</b>	<b>27.0%</b>	<b>37.6%</b>
Cost Burden is housing cost that equals 30 percent or more of household income.						
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy						

- 47.0% of low-income homeowners and 61.9% of low-income renters are cost burdened, compared to 21.6% of moderate-income homeowners and 22.1% of moderate-income renters.
- 17.1% of all homeowners and 35.4% of renters across the AA are cost burdened, compared to 16.6% of all homeowners and 37.6% of renters across Kentucky.
- The data shows that cost burden disproportionately affects renter-occupied households, particularly low-income renters and low-income homeowners, respectively.
- Cost-burdened renters may have a difficult time saving enough monies to make a sufficient down payment to purchase a home or otherwise afford increasing rents.

## Labor, Employment, and Economic Characteristics

Unemployment Rates					
Assessment Area: Nonmetropolitan Kentucky					
Area	2017	2018	2019	2020	2021
Bath County	7.8%	6.6%	5.9%	8.0%	5.8%
Boyle County	5.0%	4.3%	4.4%	7.1%	5.0%
Breathitt County	8.6%	7.1%	7.1%	9.9%	8.6%
Clay County	8.6%	6.8%	6.6%	8.2%	6.8%
Estill County	5.9%	5.3%	4.7%	7.3%	5.2%
Fleming County	6.0%	5.3%	5.1%	7.1%	4.9%
Franklin County	4.0%	3.6%	3.5%	6.3%	4.4%
Garrard County	4.8%	4.3%	4.4%	6.1%	4.5%
Jackson County	8.3%	6.8%	6.1%	8.3%	6.3%
Knott County	8.4%	6.7%	6.5%	8.2%	7.2%
Knox County	7.5%	6.1%	5.6%	8.0%	6.2%
Laurel County	5.8%	5.0%	4.6%	6.7%	4.5%
Lee County	8.3%	6.2%	5.4%	6.7%	5.6%
Leslie County	9.9%	6.9%	7.8%	10.5%	8.1%
Letcher County	9.2%	6.2%	7.0%	9.8%	7.6%
Madison County	4.2%	3.7%	3.6%	5.9%	4.1%
Menifee County	8.6%	7.4%	6.6%	8.6%	6.9%
Mercer County	4.8%	4.3%	4.4%	7.0%	4.6%
Montgomery County	6.5%	5.8%	5.1%	7.7%	5.3%
Nicholas County	5.5%	4.5%	4.2%	6.7%	4.3%
Owsley County	8.2%	7.1%	6.9%	9.3%	7.0%
Perry County	8.1%	6.1%	5.7%	8.6%	6.3%
Powell County	6.5%	5.8%	5.1%	7.2%	4.8%
Rockcastle County	5.7%	4.9%	4.6%	7.1%	5.0%
Rowan County	5.7%	5.0%	5.0%	7.2%	5.3%
Whitley County	5.7%	4.9%	4.9%	6.9%	5.0%
Wolfe County	9.0%	7.4%	6.7%	7.4%	5.9%
<b>Assessment Area</b>	<b>5.8%</b>	<b>4.9%</b>	<b>4.7%</b>	<b>7.1%</b>	<b>5.1%</b>
<b>Kentucky</b>	<b>4.8%</b>	<b>4.2%</b>	<b>4.1%</b>	<b>6.4%</b>	<b>4.7%</b>

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- While 2017-2019 unemployment rates decreased across the AA, the 2020 unemployment rate increased substantially in response to the COVID-19 pandemic. The average unemployment rate in the AA increased from 6.0% in 2019 to 7.7% in 2020. AA unemployment rates were generally higher than unemployment rates in Kentucky during this period, except in Franklin and Madison counties, which had unemployment rates that there were consistently lower than Kentucky's. Specifically, unemployment rates in Breathitt, Leslie, Letcher, Menifee, and Owsley counties were substantially higher than Kentucky's throughout the period.



- The leading industries in the AA are government, manufacturing, retail trade, accommodation and food services, and administrative and waste services.
- A demand for alternative energy sources had led to decades of declining coal production and an almost full collapse of an industry that has historically been heavily relied on in the AA, and Eastern Kentucky is the second most coal dependent area in the country. The Interagency Working Group on Coal and Power Plant Communities and Economic Revitalization (working group) is a governmental group created to focus on delivering federal resources to revitalize the local economics of coal, oil and gas, and power plant communities, and ensuring benefits and protections for workers in these communities. The working group has identified close to \$38.0 billion in federal funding for investments in coal and power plant communities, focusing on infrastructure, environmental remediation, job creation, and community revitalization.<sup>15</sup>
- According to the Appalachian Regional Commission (ARC)<sup>16</sup> the following counties in the AA are designated as distressed, at-risk, or transitional based on several economic indicators, including poverty rates, per capita market income, unemployment rates, and recently data to better understand COVID's impact in Appalachia. No Kentucky ARC county is designated as competitive or attainment. Historically, Appalachia has battled poverty, unemployment, lower educational attainment, and lower wages. Counties in this AA are still experiencing higher levels of unemployment and poverty than the national rates, with many of these counties doubling the national average.

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<sup>15</sup> [WKYT - Future of Coal](#)

<sup>16</sup> [ARC – Kentucky County Economic Levels](#)

Appalachian Regional Commission (ARC)			
County Economic Levels			
Distressed	At-Risk	Transitional	N/A
Rank in the worst 10% of the nation's counties	Rank between the worst 10%-25% of the nation's counties	Rank between the worst 25% and the best 25% of the nation's counties	No ARC rank
Bath	Fleming	Garrard	Boyle
Breathitt	Laurel	Madison	Franklin
Clay	Montgomery		Mercer
Estill			
Jackson			
Knott			
Knox			
Lee			
Leslie			
Letcher			
Menifee			
Nicholas			
Owsley			
Perry			
Rockcastle			
Rowan			
Whitley			
Wolfe			

- The Centers of Disease Control and Prevention,<sup>17</sup> has identified 220 counties at risk of being vulnerable to high rates of different types of illnesses as a result of the opioid epidemic. In the context of the national opioid epidemic, Wolfe, Breathitt, Perry, Clay, Leslie, Knox, Owsley, Whitley, Powell, Knott, Estill, Lee, Menifee, Boyle, Rockcastle, Letcher, Laurel, Bath, and Garrard counties are among these most vulnerable. In fact, Wolfe, Breathitt, Perry, Clay, Leslie, and Knox counties represent six of the top 10 most vulnerable counties in the nation. As a result, these counties are particularly susceptible to reduced labor market activity and stunted economic growth potential.
- According to BroadbandNow Kentucky,<sup>18</sup> approximately 87.0% of households in the AA have internet access. The majority of households with no internet access tend to be very low income. Nationally, those with access to a broadband-enabled computer are employed at higher rates in urban and rural counties.

<sup>17</sup> [Centers for Disease Control and Prevention](#)

<sup>18</sup> [Broadband Now - Kentucky](#)

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN KENTUCKY

Whitaker's performance under the lending test in this AA is good. Whitaker's lending activity demonstrates a good responsiveness to the credit needs of the community. Whitaker has a good geographic distribution with a moderate level of lending gaps. Whitaker has a good distribution among borrowers of different income levels and to businesses and farms of different revenue sizes. Whitaker is a leader in making development loans and makes limited use of flexible lending practices in this AA. Whitaker exhibits a good record of serving the credit needs of low-income individuals and areas and small businesses.

### *Lending Activity*

Lending activity levels reflect a good responsiveness to the credit needs within the AA. The percentage of Whitaker's lending in Nonmetropolitan Kentucky is 77.8%, compared to the percentage of total deposits is 77.3%.

Small business lending received the most weight in this AA based on total volume and dollar amount, followed by HMDA-reportable (home purchase, refinance, home improvement, respectively) and small farm lending.

Geographic distribution received greater weight than borrower distribution in Nonmetropolitan Kentucky given the overall percentage of LMI geographies (30.9%) is greater than the overall percentage of LMI families (27.2%).

### **Geographic Distribution**

Whitaker's overall distribution of lending among geographies is good. Small business, HMDA-reportable, and small farm lending are good. Whitaker has moderate lending gaps.

Percentage of Lending Penetration				
Tract Income Level	2019	2020	2021	2022
Low	50.0%	50.0%	50.0%	57.1%
Moderate	22.0%	48.8%	63.4%	57.1%
Middle	53.9%	75.0%	88.8%	79.5%
Upper	61.5%	79.3%	100.0%	94.3%
Total	46.2%	68.4%	83.6%	76.5%

Whitaker was able to penetrate 68.7% of the total tracts in the Nonmetropolitan Kentucky AA during the evaluation period. The increased penetration rate in 2021 can be attributed to the increase in small business loans through PPP. Whitaker penetrated nearly 52.0% of its low-income tracts and 47.8% of moderate-income tracts. In addition, 45 out of 88 middle-income tracts (51.0%) are distressed/underserved due to poverty, remote rural, unemployment, and/or

population loss. Whitaker was able to penetrate nearly three-quarters of these tracts during the evaluation period.

### *Small Business Lending*

During the evaluation period, Whitaker originated 2,613 small business loans to businesses of different sizes totaling \$165.9 million. Whitaker's geographic distribution of small business lending is good. Whitaker's performance was compared to the percentage of businesses by tract income (proxy) and the aggregate of all lenders. See Appendix D for explicit small business-reportable lending data.

In 2022, Whitaker originated 512 small business loans totaling \$48.9 million. Whitaker originated 16 (3.1%) small business loans in low-income tracts totaling \$1.2 million (2.4%), which exceeded the percentage of businesses in these tracts at 2.3% by volume and was comparable by dollar amount. Whitaker originated 52 (10.2%) small business loans in moderate-income tracts totaling \$6.0 million (12.2%) which was significantly below the percentage of businesses in these tracts at 21.9% by volume and below by dollar amount.

In 2021, Whitaker originated 1,315 small business loans totaling \$63.0 million. Whitaker originated 11 (0.8%) small business loans in low-income tracts totaling \$237,000 (0.4%), which was comparable to the percentage of businesses in these tracts at 0.8% by volume and fell below by dollar amount. Performance exceeded the aggregate of all lenders at 0.6% by volume and fell below at 0.6% by dollar amount. Whitaker originated 94 (7.1%) small business loans in moderate-income tracts totaling \$5.3 million (8.4%) which was significantly below the percentage of businesses in these tracts at 16.8% by volume and below by dollar amount. Performance was significantly below the aggregate of all lenders at 15.5% by volume and fell below at 12.7% by dollar amount.

In 2020, Whitaker originated 650 small business loans totaling \$43.1 million. Whitaker originated 15 (2.3%) small business loans in low-income tracts totaling \$400,000 (0.9%), which exceeded the percentage of businesses in these tracts at 0.7% by volume and dollar amount. Performance significantly exceeded the aggregate of all lenders at 0.5% by volume and exceeded at 0.7% by dollar amount. Whitaker originated 74 (11.4%) small business loans in moderate-income tracts totaling \$6.1 million (14.1%) which was below the percentage of businesses in these tracts at 16.7% by volume and slightly below by dollar amount. Performance was below the aggregate of all lenders at 16.1% by volume and exceeded at 13.9% by dollar amount.

In 2019, Whitaker originated 136 small business loans totaling \$10.8 million. Whitaker originated two (1.5%) small business loans in low-income tracts totaling \$22,000 (0.2%), which exceeded the percentage of businesses in these tracts at 0.8% by volume and fell significantly below by dollar amount. Performance exceeded the aggregate of all lenders at 0.6% by volume but fell significantly below 0.8% by dollar amount. Whitaker originated 10 (7.4%) small business loans in moderate-income tracts totaling \$187,000 (1.7%) which was significantly below the percentage

of businesses in these tracts at 17.8% by volume and substantially below by dollar amount. Performance was significantly below the aggregate of all lenders at 15.2% by volume and substantially below at 13.9% by dollar amount.

Whitaker's small business lending performance mostly exceeded proxy and the aggregate of all lenders in low-income tracts. Therefore, the geographic distribution of small business lending in low-income tracts is excellent. Whitaker's small business lending performance mostly fell below proxy and the aggregate of all lenders in moderate-income tracts. Therefore, the geographic distribution of small business lending in moderate-income tracts is adequate.

### *HMDA Lending*

During the evaluation period, Whitaker originated 1,349 HMDA-reportable loans totaling \$182.6 million. Of these loans, 583 were home purchase loans totaling \$71.8 million, 481 were refinance loans totaling \$ 55.0 million, and 143 were home improvement loans totaling \$8.8 million. Whitaker's geographic distribution of home purchase, refinance, and home improvement loans is good, considering the limited number of housing units, lower percentage of owner-occupied units, and higher percentage of rental and vacant units in LMI tracts. Whitaker's performance was compared to the percentage of owner-occupied units (proxy) and the aggregate of all lenders. See Appendix D for explicit HMDA-reportable lending data.

#### *Home Purchase Lending*

In 2022, Whitaker originated 212 home purchase loans totaling \$31.6 million. Whitaker originated seven (3.3%) home purchase loans in low-income tracts totaling \$463,000 (1.5%), which exceeded the percentage of owner-occupied units in these tracts at 2.5% by volume and was below by dollar amount. Performance exceeded the aggregate of all lenders at 1.5% by volume and 1.3% by dollar amount. Whitaker originated 19 (9.0%) home purchase loans in moderate-income tracts totaling \$1.3 million (4.1%) which was significantly below the percentage of owner-occupied units in these tracts at 24.0% by volume and substantially below by dollar amount. Performance was below the aggregate of all lenders at 13.3% by volume and significantly below at 10.4% by dollar amount.

In 2021, Whitaker originated 192 home purchase loans totaling \$22.2 million. Whitaker originated six (3.1%) home purchase loans in low-income tracts totaling \$697,000 (3.1%), which exceeded the percentage of owner-occupied units in these tracts at 1.2% by volume and dollar amount. Performance exceeded the aggregate of all lenders at 0.6% by volume and 0.4% by dollar amount. Whitaker originated 17 (8.9%) home purchase loans in moderate-income tracts totaling \$1.3 million (5.9%) which was significantly below the percentage of owner-occupied units in these tracts at 21.8% by volume and dollar amount. Performance was below the aggregate of all lenders at 13.3% by volume and at 10.8% by dollar amount.

In 2020, Whitaker originated 134 home purchase loans totaling \$14.3 million. Whitaker originated 12 (9.0%) home purchase loans in low-income tracts totaling \$935,000 (6.6%), which exceeded the

percentage of owner-occupied units in these tracts at 1.2% by volume and dollar amount. Performance exceeded the aggregate of all lenders at 0.5% by volume and 0.3% by dollar amount. Whitaker originated 12 (9.0%) home purchase loans in moderate-income tracts totaling \$760,000 (5.3%) which was significantly below the percentage of owner-occupied units in these tracts at 21.8% by volume and substantially below by dollar amount. Performance was slightly below the aggregate of all lenders at 11.6% by volume and below at 9.2% by dollar amount.

In 2019, Whitaker originated 45 home purchase loans totaling \$3.6 million. Whitaker originated one (2.2%) home purchase loan in low-income tracts totaling \$27,000 (0.7%), which exceeded the percentage of owner-occupied units in these tracts at 1.3% by volume and below by dollar amount. Performance exceeded the aggregate of all lenders at 0.4% by volume and 0.3% by dollar amount. Whitaker originated three (6.7%) home purchase loans in moderate-income tracts totaling \$272,000 (7.5%) which was significantly below the percentage of owner-occupied units in these tracts at 22.9% by volume and dollar amount. Performance was below the aggregate of all lenders at 11.4% by volume and slightly below at 8.6% by dollar amount.

Whitaker's home purchase lending performance exceeded proxy and the aggregate of all lenders in low-income tracts; and in 2022, the year with the most loans, performance was excellent. Therefore, the geographic distribution of home purchase loans in low-income tracts is excellent. Whitaker's home purchase lending fell below proxy and the aggregate of all lenders in moderate-income tracts. Therefore, the geographic distribution of home purchase lending in moderate-income tracts is adequate.

### *Refinance Lending*

In 2022, Whitaker originated 218 refinance loans totaling \$25.9 million. Whitaker originated five (2.3%) refinance loans in low-income tracts totaling \$447,000 (6.1%), which was slightly below the percentage of owner-occupied units in these tracts at 2.5% by volume and dollar amount. Performance exceeded the aggregate of all lenders at 1.0% by volume and 0.9% by dollar amount. Whitaker originated 20 (9.2%) refinance loans in moderate-income tracts totaling \$1.4 million (5.5%) which was significantly below the percentage of owner-occupied units in these tracts at 24.0% by volume and substantially below by dollar amount. Performance was slightly below the aggregate of all lenders at 11.5% by volume and below at 9.4% by dollar amount.

In 2021, Whitaker originated 138 refinance loans totaling \$15.3 million. Whitaker originated four (2.9%) refinance loans in low-income tracts totaling \$387,000 (2.5%), which exceeded the percentage of owner-occupied units in these tracts at 1.2% by volume and dollar amount. Performance exceeded the aggregate of all lenders at 0.3% by volume and 0.3% by dollar amount. Whitaker originated 11 (8.0%) refinance loans in moderate-income tracts totaling \$925,000 (6.0%) which was significantly below the percentage of owner-occupied units in these tracts at 21.8% by volume and dollar amount. Performance was slightly below the aggregate of all lenders at 9.8% by volume and at 8.0% by dollar amount.

In 2020, Whitaker originated 96 refinance loans totaling \$10.9 million. Whitaker originated six (6.3%) refinance loans in low-income tracts totaling \$542,000 (5.0%), which exceeded the percentage of owner-occupied units in these tracts at 1.2% by volume and dollar amount. Performance exceeded the aggregate of all lenders at 0.4% by volume and 0.4% by dollar amount. Whitaker originated two (2.1%) refinance loans in moderate-income tracts totaling \$194,000 (1.8%) which was substantially below the percentage of owner-occupied units in these tracts at 21.8% by volume and dollar amount. Performance was substantially below the aggregate of all lenders at 9.5% by volume and at 7.9% by dollar amount.

In 2019, Whitaker originated 29 refinance loans totaling \$2.8 million. Whitaker originated one (3.4%) refinance loan in low-income tracts totaling \$67,000 (2.4%), which exceeded the percentage of owner-occupied units in these tracts at 1.3% by volume and dollar amount. Performance exceeded the aggregate of all lenders at 0.6% by volume and 0.6% by dollar amount. Whitaker originated two (6.9%) refinance loans in moderate-income tracts totaling \$77,000 (2.7%) which was significantly below the percentage of owner-occupied units in these tracts at 22.9% by volume and substantially below by dollar amount. Performance was below the aggregate of all lenders at 11.7% by volume and significantly below at 8.9% by dollar amount.

Whitaker's refinance lending performance fell slightly below the percentage of owner-occupied units and exceeded the aggregate of all lenders in low-income tracts. Therefore, geographic distribution of refinance lending in low-income tracts is good. Whitaker's refinance lending performance fell below the percentage of owner-occupied units and the aggregate of all lenders in moderate-income tracts. Therefore, geographic distribution of refinance lending in moderate-income tracts is adequate.

#### *Home Improvement Lending*

In 2022, Whitaker originated 112 home improvement loans totaling \$7.3 million. Whitaker originated five (4.5%) home improvement loans in low-income tracts totaling \$447,000 (6.1%) which exceeded the percentage of owner-occupied units in these tracts at 2.5% by volume and dollar amount. Performance exceeded the aggregate of all lenders at 1.1% by volume and 1.4% by dollar amount. Whitaker originated six (5.4%) home improvement loans in moderate-income tracts totaling \$192,000 (2.6%) which was substantially below the percentage of owner-occupied units at 24.0% by volume and dollar amount. Performance was below the aggregate of all lenders at 10.3% by volume and significantly below at 8.1% by dollar amount.

Whitaker's home improvement lending performance exceeded the percentage of owner-occupied units and the aggregate of all lenders in low-income tracts. Therefore, geographic distribution of home improvement lending in low-income tract is excellent. Whitaker's home improvement lending performance fell below the percentage of owner-occupied units and the aggregate of all lenders in moderate-income tracts. Therefore, geographic distribution of home improvement lending in moderate-income tracts is adequate. Housing in LMI areas tends to be older and in

need of repair. The median age of housing stock is 42 years old in this AA. Home improvement loans can help with home repairs and modifications.

### *Small Farm Lending*

During the evaluation period, Whitaker originated 926 small farm loans to farms of different sizes totaling \$38.4 million. Whitaker's geographic distribution of small farm lending is good. Whitaker's performance was compared to the percentage of farms by tract income (proxy) and the aggregate of all lenders. See Appendix D for explicit small farm-reportable lending data.

In 2022, Whitaker originated 195 small farm loans totaling \$13.7 million. Whitaker originated three (1.5%) small farm loans in low-income tracts totaling \$170,000 (1.2%) which exceeded the percentage of farms by tract income at 1.1% by volume and dollar amount. Whitaker originated 15 (7.7%) small farm loans in moderate-income tracts totaling \$708,000 (5.2%) which was significantly below the percentage of farms by tract income by volume and dollar amount.

In 2021, Whitaker originated 568 small farm loans totaling \$17.0 million. Whitaker originated eight (1.4%) small farm loans in low-income tracts totaling \$28,000 (0.2%) which exceeded the percentage of farms by tract income at 0.4% by volume and significantly below dollar amount. Performance exceeded the aggregate of all lenders at 0.9% by volume and 0.1% by dollar amount. Whitaker originated 37 (6.5%) small farm loans in moderate-income tracts totaling \$904,000 (5.3%) which was significantly below the percentage of farms by tract income at 16.7% by volume and dollar amount. Performance was below the aggregate of all lenders at 9.8% by volume and 8.7% by dollar amount.

In 2020, Whitaker originated 116 small farm loans totaling \$6.1 million. Whitaker originated one small farm loan in low-income tracts totaling \$70,000 (1.1%) which exceeded the percentage of farms by tract income at 0.4% by volume and dollar amount. Performance exceeded the aggregate of all lenders at 0.4% by volume and 0.5% by dollar amount. Whitaker originated eight (6.9%) small farm loans in moderate-income tracts totaling \$179,000 (2.9%) which was significantly below the percentage of farms by tract income at 16.2% by volume and substantially below by dollar amount. Performance was below the aggregate of all lenders at 10.2% by volume and 5.8% by dollar amount.

In 2019, Whitaker originated 47 small farm loans totaling \$1.2 million. Whitaker originated two (4.3%) small farm loan in low-income tracts totaling \$69,000 (4.4%) which exceeded the percentage of farms by tract income at 0.4% by volume and dollar amount. Performance exceeded the aggregate of all lenders at 0.5% by volume and 0.4% by dollar amount. Whitaker originated four (8.5%) small farm loans in moderate-income tracts totaling \$30,000 (1.9%) which was below the percentage of farms by tract income at 16.1% by volume and substantially below by dollar amount. Performance was slightly below the aggregate of all lenders at 9.9% by volume and significantly below at 7.4% by dollar amount.



Whitaker's small farm lending performance exceeded the percentage of farms in low-income tracts and the aggregate of all lenders. Therefore, geographic distribution of small farm lending in low-income tracts is excellent. Whitaker's small farm lending performance fell below the percentage of farms in moderate-income tracts and the aggregate of all lenders. Therefore, geographic distribution of small farm lending in moderate-income tracts is adequate.

### ***Distribution by Borrower Income and Revenue Size of Businesses and Farms***

Whitaker's distribution among borrowers of different income (including LMI) levels is good. The distribution of HMDA-reportable lending is good, and the distribution to businesses and farms of different sizes is good.

### ***Small Business Lending***

During the evaluation period, Whitaker originated 2,613 loans to businesses of different sizes totaling \$165.9 million. Of these loans 1,180 (45.2%) totaling \$35.3 million (21.3%) are PPP loans with unknown gross annual revenues. Whitaker's performance was compared to the percentage of businesses (proxy) and the aggregate of all lenders.

In 2022, Whitaker originated 512 loans to businesses of different sizes totaling \$49.0 million, of which 8.6% were extended to businesses with unknown gross annual revenues. Whitaker originated 391 (76.4%) loans totaling \$28.7 million (58.5%) to businesses with revenues of \$1.0 million or less, which was slightly below the percentage of small businesses at 91.3% by volume and below by dollar amount. Whitaker also originated 398 (77.7%) small dollar loans in amounts of \$100,000 or less. Whitaker's willingness to lend in smaller amounts exhibits a good responsiveness to credit needs of small businesses in the AA.

In 2021, Whitaker originated 1,315 loans to businesses of different sizes totaling \$63.1 million, of which 64.6% of those loans were extended to businesses with unknown gross annual revenues. Of the total loans, 809 (62.0%) totaling \$16.9 million (27.0%) were PPP loans with unknown gross annual revenues. Whitaker originated 414 (31.5%) loans totaling \$29.3 million (46.5%) to businesses with revenues of \$1.0 million or less, which was significantly below the percentage of small businesses at 91.3% by volume and below by dollar amount. Performance was below the aggregate of all lenders at 45.8% by volume and exceeded the aggregate at 36.9% by dollar amount. Whitaker also originated 1,181 (89.8%) small dollar loans in amounts of \$100,000 or less, compared to the aggregate of all lenders at 94.4%. Whitaker's willingness to lend in small amounts exhibits a good responsiveness to credit needs of small businesses in the AA, particularly those impacted by the COVID-19 emergency.

In 2020, Whitaker originated 650 loans to businesses of different sizes totaling \$43.1 million, of which 61.2% of those loans were extended to businesses with unknown gross annual revenues. Of the total of loans, 371 (57.0%) totaling \$18.4 million (43.0%) were PPP loans with unknown gross annual revenues. Whitaker originated 207 (31.8%) loans totaling \$11.9 million (27.5%) to

businesses with revenues of \$1.0 million or less, which was significantly below the percentage of small businesses at 91.2% by volume and by dollar amount. Performance was slightly below the aggregate of all lenders at 32.2% by volume and exceeded the aggregate at 26.3% by dollar amount. Whitaker also originated 551 (84.8%) small dollar loans in amounts of \$100,000 or less, compared to the aggregate of all lenders at 90.3%. Whitaker's willingness to lend in small amounts exhibits a good responsiveness to credit needs of small businesses in the AA, particularly those impacted by the COVID-19 emergency.

In 2019, Whitaker originated 136 loans to businesses of different sizes totaling \$10.8 million, of which 16.2% of those loans were extended to businesses with unknown gross annual revenues. Whitaker originated 94 (69.1%) loans totaling \$5.4 million (50%) to businesses with revenues of \$1.0 million or less, which was slightly below the percentage of small businesses at 91.1% by volume and below by dollar amount. Performance exceeded the aggregate of all lenders at 40.6% by volume and 36.3% by dollar amount. Whitaker also originated 111 (81.6%) small dollar loans in amounts of \$100,000 or less, compared to the aggregate of all lenders at 94.5%. Whitaker's willingness to lend in small amounts exhibits a good responsiveness to credit needs of small businesses in the AA.

While Whitaker's performance in 2021 and 2020 fell well below proxy and the aggregate of all lenders, a large percentage of businesses had unknown gross annual revenue which can skew results. However, Whitaker's performance in 2022 and 2019 which did not have a large percentage of unknown gross annual revenues was good. Whitaker also exhibits a good responsiveness to credit needs of small businesses in the AA, since small dollar loans tend to represent amounts typically requested by small businesses, particularly those impacted by the COVID-19 emergency. Small dollar lending was identified by community contacts as a critical way to help small business owners meet their ongoing credit needs in order to stay in business or expand. Therefore, Whitaker's distribution to businesses of different sizes is good.

### ***HMDA Lending***

During the evaluation period, Whitaker Bank originated 1,349 HMDA- reportable loans totaling \$182.6 million. Of these loans, 583 were home purchase loans totaling \$71.8 million, 481 were refinance loans totaling \$ 55.0 million, and 143 were home improvement loans totaling \$8.8 million. Whitaker's borrower distribution of home purchase, refinance, and home improvement loans is good. Whitaker's performance was compared to the percentage of families (proxy) and the aggregate of all lenders.

### ***Home Purchase Lending***

In 2022, Whitaker originated 212 home purchase loans totaling \$31.6 million. Whitaker originated 23 (10.8%) home purchase loans to borrowers with unknown income totaling \$4.2 million (13.2%). By comparison, the aggregate of all lenders originated 18.6% by volume and 19.6% by dollar amount to borrowers with unknown incomes.

Whitaker originated 14 (6.6%) home purchase loans to low-income borrowers totaling \$863,000 (2.7%), which was significantly below the percentage of families (proxy) at 24.5% by volume and substantially below by dollar amount. Performance exceeded the aggregate of all lenders at 3.7% by volume and by 1.7% by dollar amount. Whitaker originated 38 (17.9%) home purchase loans to moderate-income borrowers totaling \$3.5 million (11.0%), which exceeded the percentage of families (proxy) at 16.3% by volume and below by dollar amount. Performance exceeded the aggregate of all lenders at 17.5% by volume and was slightly below at 11.7% by dollar amount.

In 2021, Whitaker originated 192 home purchase loans totaling \$22.2 million. Whitaker originated 23 (12.0%) home purchase loans to borrowers with unknown income totaling \$3.7 million. By comparison, the aggregate of all lenders originated 20.3% by volume and 20.4% by dollar amount to borrowers with unknown incomes.

Whitaker originated five (2.6%) home purchase loans to low-income borrowers totaling \$312,000 (1.4%), which was substantially below the percentage of families (proxy) at 25.4% by volume and dollar amount. Performance was slightly below the aggregate of all lenders at 3.1% by volume and by 1.5% by dollar amount. Whitaker originated 31 (16.1%) home purchase loans to moderate-income borrowers totaling \$2.0 million (9.4%), which exceeded the percentage of families (proxy) at 16.1% by volume and was below by dollar amount. Performance exceeded the aggregate of all lenders at 15.9% by volume and was slightly below at 10.7% by dollar amount.

In 2020, Whitaker originated 134 home purchase loans totaling \$14.3 million. Whitaker originated 18 (13.4%) home purchase loans to borrowers with unknown income totaling \$1.7 million. By comparison, the aggregate of all lenders originated 13.8% by volume and 13.6% by dollar amount to borrowers with unknown incomes.

Whitaker originated 12 (9.0%) home purchase loans to low-income borrowers totaling \$613,000 (4.3%), which was significantly below the percentage of families (proxy) at 25.4% by volume and substantially below by dollar amount. Performance exceeded the aggregate of all lenders at 3.5% by volume and by 1.7% by dollar amount. Whitaker originated 23 (17.2%) home purchase loans to moderate-income borrowers totaling \$1.6 million (11.5%), which exceeded the percentage of families (proxy) at 16.1% by volume and was below by dollar amount. Performance exceeded the aggregate of all lenders at 16.8% by volume and at 11.3% by dollar amount.

In 2019, Whitaker originated 45 home purchase loans totaling \$3.6 million. Whitaker originated five (11.1%) home purchase loans to borrowers with unknown income totaling \$496,000 (13.6%). By comparison, the aggregate of all lenders originated 15.9% by volume and 16.1% by dollar amount to borrowers with unknown incomes.

Whitaker originated two (4.4%) home purchase loans to low-income borrowers totaling \$39,000 (1.1%), which was substantially below the percentage of families (proxy) at 25.7% by volume and dollar amount. Performance exceeded the aggregate of all lenders at 2.9% by volume and below at 1.4% by dollar amount. Whitaker originated seven (15.6%) home purchase loans to moderate-income borrowers totaling \$458,000 (12.6%), which was slightly below the percentage of families

(proxy) at 16.2% by volume and dollar amount. Performance exceeded the aggregate of all lenders at 14.9% by volume and 9.8% by dollar amount.

Whitaker's performance to LMI borrowers fell slightly below proxy and aggregate of all lenders. Considering the high levels of poverty and unemployment, borrower distribution of home purchase loans to LMI borrowers is good.

### *Refinance Lending*

In 2022, Whitaker originated 218 refinance loans totaling \$25.9 million. Whitaker originated 106 (48.6%) refinance loans to borrowers with unknown incomes totaling \$2.0 million (7.5%). By comparison, the aggregate of lenders originated 9.0% by volume and 11.3% by dollar amount to borrowers with unknown incomes.

Whitaker originated 24 (11.0%) refinance loans to low-income borrowers totaling \$1.5 million (5.7%), which was significantly below the percentage of families at 24.5% by volume and substantially below by dollar amount. Performance exceeded the aggregate of all lenders at 6.4% by volume and 3.2% by dollar amount. Whitaker originated 26 (11.9%) refinance loans to moderate-income borrowers totaling \$2.0 million (7.6%), which was below the percentage of families at 16.3% by volume but significantly below by dollar amount. Performance was below the aggregate of all lenders at 17.4% by volume and 12.6% by dollar amount.

In 2021, Whitaker originated 138 refinance loans totaling \$15.3 million. Whitaker originated 14 (10.1%) refinance loans to borrowers with unknown incomes totaling \$3.2 million (20.8%). By comparison the aggregate of lenders originated 20.1% by volume and 22.7% by dollar amount to borrowers with unknown incomes.

Whitaker originated seven (5.1%) refinance loans to low-income borrowers totaling \$481,000 (3.1%), which was substantially below the percentage of families at 25.4% by volume and dollar amount. Performance exceeded the aggregate of all lenders at 2.9% by volume and 1.5% by dollar amount. Whitaker originated 29 (21.0%) refinance loans to moderate-income borrowers totaling \$2.4 million (15.7%), which exceeded the percentage of families at 16.1% by volume but slightly below by dollar amount. Performance exceeded the aggregate of all lenders at 10.0% by volume and 6.6% by dollar amount.

In 2020, Whitaker originated 96 refinance loans totaling \$10.9 million. Whitaker originated five (5.2%) refinance loans to borrowers with unknown incomes totaling \$508,000 (4.7%). By comparison the aggregate of lenders originated 22.3% by volume and 25.0% by dollar amount to borrowers with unknown incomes.

Whitaker originated seven (7.3%) refinance loans to low-income borrowers totaling \$399,000 (3.7%), which was significantly below the percentage of families at 25.4% by volume and substantially below by dollar amount. Performance exceeded the aggregate of all lenders at 2.0%

by volume and 0.9% by dollar amount. Whitaker originated 14 (14.6%) refinance loans to moderate-income borrowers totaling \$955,000 (8.8%) which was slightly below the percentage of families at 16.1% by volume and below by dollar amount. Performance exceeded the aggregate of all lenders at 8.2% by volume and 5.1% by dollar amount.

In 2019, Whitaker originated 29 refinance loans totaling \$2.8 million. Whitaker originated three (10.3%) refinance loans to borrowers with unknown income totaling \$322,000 (11.4%). By comparison, the aggregate of all lenders originated 17.6% by volume and 21.4% by dollar amount to borrowers with unknown incomes.

Whitaker originated two (6.9%) refinance loans to low-income borrowers totaling \$47,000 (1.7%), which was significantly below the percentage of families at 25.7% by volume and substantially below by dollar amount. Performance exceeded the aggregate of all lenders at 3.7% by volume and slightly below at 2.0% by dollar amount. Whitaker originated five (17.2%) refinance loans to moderate-income borrowers totaling \$333,000 (11.8%) which exceeded the percentage of families at 16.2% by volume and below by dollar amount. Performance exceeded the aggregate of all lenders at 10.3% by volume and 5.9% by dollar amount.

Whitaker's performance fell well below the percentage of families but consistently exceeded the aggregate of all lenders to low-income borrowers. The bank's performance fell slightly below proxy and the aggregate of all lenders to moderate-income borrowers. Considering the high levels of poverty and unemployment, borrower distribution of refinance loans to LMI borrowers is good.

#### *Home Improvement Lending*

In 2022, Whitaker originated 112 home improvement loans totaling \$7.4 million. Whitaker originated six (5.4%) home improvement loans to borrowers with unknown incomes totaling \$459,000 (6.2%). By comparison, the aggregate of all lenders originated 3.2% by volume and 4.5% by dollar amount to borrowers with unknown incomes.

Whitaker originated 10 (8.9%) home improvement loans to low-income borrowers totaling \$348,000 (4.7%) which was significantly below the percentage of families at 24.5% by volume and substantially below by dollar amount. Performance significantly exceeded the aggregate of all lenders at 5.6% by volume and 2.8% by dollar amount. Whitaker originated 15 (13.4%) home improvement loans to moderate-income borrowers totaling \$463,000 (6.3%) which was slightly below the percentage of families at 16.3% by volume and significantly below by dollar amount. Performance exceeded the aggregate of all lenders at 11.9% by volume and was below at 8.5% by dollar amount.

Whitaker's performance to LMI borrowers fell below the percentage of families and significantly exceeded the aggregate of all lenders. Considering the high levels of poverty and unemployment, borrower distribution of home improvement loans to LMI borrowers is good.

### *Small Farm Lending*

During the evaluation period, Whitaker originated 926 loans to farms of different sizes totaling \$38.4 million. Of these loans 375 (40.5%) totaling \$2.5 million (6.5%) are PPP loans with unknown gross annual revenues. Whitaker's performance was compared to the percentage of farms (proxy) and the aggregate of all lenders.

In 2022, Whitaker originated 195 loans to farms of different sizes totaling \$13.7 million, of which 7.7% were extended to farms with unknown gross annual revenues. Whitaker originated 176 (90.3%) loans totaling \$11.7 million (85.3%) to farms with revenues of \$1.0 million or less, which was slightly below the percentage of small farms at 99.0% by volume and dollar amount. Whitaker also originated 151 (77.4%) small dollar loans in amounts of \$100,000 or less. Whitaker's willingness to lend in smaller amounts exhibits a good responsiveness to credit needs of small farms in the AA.

In 2021, Whitaker originated 568 loans to farms of different sizes totaling \$17.0 million, of which 68.0% of those loans were extended to farms with unknown gross annual revenues. Of the total loans, 370 (65.0%) totaling \$2.5 million (15.0%) were PPP loans with unknown gross annual revenues. Whitaker originated 180 (31.7%) loans totaling \$13.1 million (76.8%) to farms with revenues of \$1.0 million or less, which was significantly below the percentage of small farms at 99.0% by volume and below by dollar amount. Performance was slightly below the aggregate of all lenders at 38.7% by volume and exceeded at 70.7% by dollar amount. Whitaker also originated 524 (92.3%) small dollar loans in amounts of \$100,000 or less, compared to the aggregate of all lenders at 91.9%. Whitaker's willingness to lend in small amounts exhibits an excellent responsiveness to credit needs of small farms in the AA, particularly those impacted by the COVID-19 emergency.

In 2020, Whitaker originated 116 loans to farms of different sizes totaling \$6.1 million, of which 14.7% of those loans were extended to farms with unknown gross annual revenues. Of the total of loans, five (4.0%) totaling \$32,000 (<1.0%) were PPP loans with unknown gross annual revenues. Whitaker originated 99 (85.3%) loans totaling \$5.8 million (94.1%) to farms with revenues of \$1.0 million or less, which was slightly below the percentage of small farms at 98.4% by volume and by dollar amount. Performance exceeded the aggregate of all lenders at 53.1% by volume and 72.7% by dollar amount. Whitaker also originated 105 (90.5%) small dollar loans in amounts of \$100,000 or less, compared to the aggregate of all lenders at 92.0%. Whitaker's willingness to lend in small amounts exhibits an excellent responsiveness to credit needs of small farms in the AA, particularly those impacted by the COVID-19 emergency.

In 2019, Whitaker originated 47 loans to farms of different sizes totaling \$1.6 million, of which 4.3% of those loans were extended to farms with unknown gross annual revenues. Whitaker originated 44 (93.6%) loans totaling \$1.5 million (97.3%) to farms with revenues of \$1.0 million or less, which was slightly below the percentage of small farms at 98.6% by volume and dollar amount. Performance exceeded the aggregate of all lenders at 64.3% by volume and 80.9% by

dollar amount. Whitaker also originated 44 (93.6%) small dollar loans in amounts of \$100,000 or less, compared to the aggregate of all lenders at 88.8%. Whitaker's willingness to lend in small amounts exhibits an excellent responsiveness to credit needs of small farms in the AA.

The overall percentage of farm loans with unknown gross annual revenue did not skew results. Whitaker's performance fell slightly below proxy and the aggregate of all lenders. However, Whitaker also exhibits an excellent responsiveness to credit needs of small farms in the AA, since small dollar loans tend to represent amounts typically requested by small farms, particularly those impacted by the COVID-19 emergency. Therefore, Whitaker's distribution to farms of different sizes is good.

### *Community Development Loans*

Whitaker originated or renewed 52 community development loans totaling approximately \$9.8 million. This represents a substantial increase by dollar amount since the previous evaluation. The following table reflects the total number community development loans by purpose, number, and dollar amount.

<b>Purpose of CD Loan</b>	<b>#</b>	<b>\$</b>
Revitalization / Stabilization	48	\$8,835,088
Economic Development	2	\$817,500
Affordable Housing	1	\$125,000
Community Services	1	\$25,000
<b>Total</b>	<b>52</b>	<b>\$9,802,588</b>

Whitaker originated the following community development loans:

#### *Revitalization / Stabilization*

- 38 PPP loans totaling \$5.0 million providing funding to 10 small business in moderate-income communities and 20 small businesses in distressed or underserved middle-income communities. These loans are considered responsive because they helped revitalize/stabilize distressed or underserved middle-income communities and moderate-income communities by helping these businesses keep workers employed during the height of the COVID-19 emergency.<sup>19</sup>
- Three (3) loans totaling \$3.0 million providing emergency funding to a distressed middle-income community in a declared disaster area as a result of the Eastern Kentucky floods.
- One (1) loan totaling \$473,962 to construct a water park to encourage job creation, increased tourism, higher spending, and tax revenues in a distressed middle-income community.

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<sup>19</sup> Whitaker had PPP loans originated by Peoples in 2020, prior to the merger. These loans were not reported since Peoples was not a CRA reporter. Since these loans were not CRA reportable, they were considered as community development loans if they had a primary purpose of community development.

- Four (4) loans totaling \$144,092 to purchase two police vehicles and firefighting protective gear in three distressed middle-income communities.
- Two (2) loans totaling \$221,071 to fund the repair of deteriorated sidewalks to ensure sustainable infrastructure in a distressed middle-income community.

These loans are considered responsive because they helped to revitalize/stabilize LMI or distressed middle-income communities which have higher rates of poverty, unemployment, and population loss.

#### Economic Development

- Two (2) loans totaling \$817,500 to an economic development association to renovate two buildings to retain an existing small business with nine employees and attract a new small business and at least 20 new LMI jobs in a distressed middle-income community.

Community contacts emphasized the need for financial institutions to help community stakeholders attract and maintain small businesses in this AA.

#### Affordable Housing

- Short-term line of credit to a national nonprofit affordable housing organization to continue its work while awaiting contract and grant payments.

Community contacts emphasized all aspects of affordable housing as a critical need.

#### Community Services – Whitaker originated the following:

- A revolving line of credit to a nonprofit to help them purchase eyeglasses and provide eye exams to LMI individuals and children residing in a distressed middle-income community.

Meeting health needs of LMI, particularly in distressed and underserved geographies is responsive to improving community health. Community contacts also stressed the need for eliminating barriers to healthcare services.

These loans represent 71.2% by volume and 51.1% by dollar amount of Whitaker's total community development lending, compared to the percentage of total lending at 77.8% and total deposits at 77.3%. These loans exhibit an excellent responsiveness to credit needs of small businesses and LMI individuals and particularly in distressed or underserved middle-income communities by providing access to critical financing, improving opportunities, and meeting health needs of LMI. Whitaker is a leader in making community development loans in Nonmetropolitan Kentucky given the size and presence of the institution and community development lending opportunities in this AA.

#### *Flexible Lending Programs*

Whitaker originated 1,759 PPP loans totaling \$49.5 million in 2020 and 2021, representing approximately 74.7% by volume and 62.2% by dollar amount of total PPP loans. The following tables show the percentage by volume and dollar amount of PPP loans and distribution of lending by census tracts.



Geographic Distribution of PPP Loans					
Assessment Area: Nonmetropolitan Kentucky 2020					
Tract Income	Number of Loans	# - %	Total Loan Amount	\$ - %	Percentage of Businesses
Low	12	2.2%	\$315,083	1.1%	0.7%
Moderate	46	8.3%	\$3,675,437	13.0%	16.7%
Middle	359	64.8%	\$19,086,133	67.3%	56.9%
Upper	137	24.7%	\$5,268,983	18.6%	25.7%
<b>Total</b>	<b>554</b>	<b>100.0%</b>	<b>\$28,345,636</b>	<b>100.0%</b>	<b>100.0%</b>

In 2020 Whitaker originated 12 PPP loans totaling \$315,083 in low-income tracts, which exceeded the percentage of businesses (proxy) by volume and dollar amount at 0.7%. Whitaker originated 46 PPP loans totaling \$3.7 million in moderate-income tracts, which fell below proxy by volume and dollar amount at 16.7%.

Geographic Distribution of PPP Loans					
Assessment Area: Nonmetropolitan Kentucky 2021					
Tract Income	Number of Loans	# - %	Total Loan Amount	\$ - %	Percentage of Businesses
Low	17	1.4%	\$209,988	1.0%	0.8%
Moderate	84	7.0%	\$1,303,462	6.2%	16.8%
Middle	800	66.4%	\$15,410,201	72.8%	56.6%
Upper	304	25.2%	\$4,218,352	20.0%	25.8%
<b>Total</b>	<b>1,205</b>	<b>100.0%</b>	<b>\$21,142,003</b>	<b>100.0%</b>	<b>100.0%</b>

In 2021 Whitaker originated 17 PPP loans totaling \$209,988 in low-income tracts, which exceeded proxy by volume and dollar amount at 0.8%. Whitaker originated 84 PPP loans totaling \$1.3 million in moderate-income tracts, which fell significantly below proxy by volume and dollar amount at 16.8%.

Whitaker did not originate a large number of PPP loans in low-income tracts; however, performance exceeded proxy; and while Whitaker originated a larger number of PPP loans in moderate-income tracts, performance fell significantly below proxy. Overall, PPP lending is considered responsive to serving credit needs of businesses in LMI geographies in response to the COVID-19 emergency. Whitaker makes limited use of flexible lending practices in serving AA credit needs.

## **Investment Test**

Whitaker has a significant level of qualified community development investments and donations and is occasionally in a leadership position.

<b>Purpose of CD Investments</b>	<b>#</b>	<b>\$</b>
Community Services	30	\$13,583,100
Affordable Housing	5	\$1,142,389
<b>Total</b>	<b>35</b>	<b>\$14,725,489</b>

Whitaker obtained five new investments worth approximately \$1.9 million. One of these investments was a municipal school bond worth approximately \$1.0 million that benefits a school at which 50.0% or more of students qualify for the free- and reduced-price meals under the National School Lunch Program. The remaining four new investments worth approximately \$848,938 were mortgage-backed securities. These mortgage-backed securities helped support affordable single-family and multifamily housing for LMI individuals, seniors, and families in the AA. Whitaker also holds 30 prior period investments with a book value of approximately \$12.9 million. Twenty-nine prior period investments were municipal school bonds with a book value of \$12.6 million, and the remaining prior period investment was a mortgage-backed security with a book value of \$293,451. These prior period investments supported LMI schools, a state university of which a majority of students receive Pell grants, and affordable housing.

New investments represent 12.6% and prior period investments represent 87.4% of total qualified investments by dollar amount in Nonmetropolitan Kentucky. Approximately 61.4% of Whitaker's qualified investments by dollar amount benefited Nonmetropolitan Kentucky, compared to the percentage of total deposits in the AA at 77.3%.

Qualified investments also took the form of donations totaling \$797,986. Whitaker partners with a wide array of organizations and nonprofits to fund and initiatives aimed at responding to community needs by providing a multitude of wraparound services to LMI individuals and families, revitalization/stabilization, affordable housing, and economic development activities. The following table reflects the total number community development donations by purpose, number, and dollar amount.

<b>Purpose of CD Donations</b>	<b>#</b>	<b>\$</b>
Community Service	732	\$758,022
Revitalization/Stabilization	15	\$37,915
Affordable Housing	5	\$1,700
Economic Development	1	\$350
<b>Total</b>	<b>753</b>	<b>\$797,986</b>

Approximately 77.0% of Whitaker's small dollar donations by dollar amount benefited Nonmetropolitan Kentucky, compared to the percentage of total deposits in the AA at 77.3%.

Examples of impactful small dollar donations include but are not limited to:

- \$275,000 (12 separate donations) to enhance one college's, three middle schools', and nine high schools' baseball, softball, football, and/or track fields in six distressed middle-income communities with 50.0% or more students that qualify for the free- and reduced-price meals. Youth sports help decrease unsupervised time and provide LMI youth an opportunity to engage in physical exercise.
- \$10,000 donation to a health care foundation to help them to continue offering primary care and additional health services regardless of a patient's ability to pay.
- \$6,050 (12 separate donations) to support local food banks and pantries helping LMI individuals and families dealing with food insecurity across multiple distressed or underserved middle-income communities.
- \$4,500 in-kind donations of 2,800 bottles of water (water fountains shut off during COVID-19 emergency) and 400 tote bags for teachers to use to put study materials in to be used at home for virtual learning during COVID-19 emergency. The schools are in a distressed middle-income community with 50.0% or more students that qualify for the free- and reduced-price meals.
- \$3,300 (seven separate donations) to support homeless coalitions/shelters.
- \$3,000 (19 separate donations) to support a meal sponsorship program for LMI seniors dealing with food insecurity.
- \$2,700 (four separate donations) to help keep a drug recovery center open in a distressed middle-income community and support drug awareness initiatives.

During the evaluation period, 57.2% of Whitaker's total qualified investments and donations by dollar amount benefited Nonmetropolitan Kentucky, compared to the percentage of total deposits in the AA at 77.3%. This represents a significant increase by dollar amount since previous evaluation. While Whitaker did not make use of complex investments to support community development initiatives; investing in municipal bonds and mortgage-backed securities designed to finance community development in distressed and/or underserved communities and address affordable housing is responsive to credit and community development needs in this AA. The majority of qualified investments were outstanding prior period commitments; however, these investments continue to help support LMI students and affordable housing in underserved communities. Community contacts emphasized all aspects of affordable housing as a critical need and indicated there are opportunities for financial institutions to collaborate with local officials to better address the AA's issues and challenges. Whitaker's small dollar donations help provide access and support for a variety of wraparound services for LMI families and children, which is essential in this AA that has significant challenges around poverty, unemployment, and drug addiction. Small dollar donations were also responsive LMI students at the height of the COVID-19 emergency. Overall, qualified investments and donations exhibit good responsiveness to credit and community development needs in Nonmetropolitan Kentucky.

## **Service Test**

Retail services are accessible, and Whitaker is a leader in providing community development services in Nonmetropolitan Kentucky.

### ***Retail Services***

Whitaker maintains 33 branches with ATMs and four branches without ATMs in Nonmetropolitan Kentucky. Since the previous evaluation, Whitaker opened one branch without an ATM in Danville (Boyle County) in a moderate-income tract on November 9, 2020. Whitaker acquired eight branches with ATMs and one branch without an ATM from the merger with Peoples on December 1, 2020. Four acquired branches are in Berea (Madison County). Two of these branches with ATMs are in low-income tracts and the remaining branch with an ATM and the branch without an ATM are in middle-income tracts. Three acquired branches with ATMs are in Richmond (Madison County). Two of these branches are middle-income tracts and one is in an upper-income tract. The two remaining acquired branches with ATMs are in Waco (Madison County) and Mount Vernon (Rockcastle County) in middle- and distressed middle-income tracts, respectively. With regard to existing branches, Whitaker has one branch with an ATM in Campton (Wolfe County) in a low-income tract. Whitaker has six branches with ATMs in Jenkins and Isom (Letcher County), Corbin<sup>20</sup> (Knox County), Morehead (Rowan County), Williamsburg (Whitley County), and Frankfort (Franklin County), and also has a branch without an ATM in Whitesburg (Letcher County) in moderate-income tracts. In middle-income tracts Whitaker has two branches with ATMs in Lancaster (Garrard County), two branches with ATMs in Harrodsburg (Mercer County), and three branches in Mount Sterling (two with ATMs and one without an ATM) in Montgomery County. Whitaker also has four branches with ATMs in distressed middle-income tracts in Whitesburg (Letcher County), Hazard (Perry County), Stanton (Powell County), and Corbin (Whitley County). Lastly, Whitaker has eight branches with ATMs in upper-income tracts. There are two branches in Corbin (Laurel and Whitley counties), Harrodsburg (Mercer County), Hazard Perry County), Clay City (Powell County), Morehead (Rowan County), and Frankfort (Franklin County).

Whitaker also maintains 10 stand-alone ATMs in Nonmetropolitan Kentucky. In low-income tracts Whitaker has two ATMs in Berea (Madison County) and Campton (Wolfe County) in local government buildings. In middle-income tracts Whitaker has four ATMs in Berea (Madison County), Carlisle (Nicholas County), and Stanton and Clay City (Powell County) on a college campus and in gas stations and a convenience store. In upper-income tracts Whitaker has four ATMs in Lancaster (Garrard County) and Slade and two in Clay City (Powell County) in grocery stores and a national state park. Since the previous evaluation, Whitaker closed three standalone ATMs in Frankfort (Franklin County) in an upper-income tract, Slade (Powell County) in a middle-income tract, and Berea (Madison County) in a middle-income tract.

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<sup>20</sup> The city of Corbin is in Knox, Laurel, and Whitley counties.

Overall Whitaker's record of opening branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

The following table illustrates the percentage of branch offices and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and total businesses in those tracts.

Geographic Distribution of Branches and ATMs

Exam: Whitaker Bank, Inc.

Analysis Year: 2022

Assessment Area(s): Nonmetropolitan Kentucky

Tract Income Levels	BRANCHES							ATMS										DEMOGRAPHICS*				
	Total Branches		Opened	Closed**	Drive-Thru	Extended Hours	Weekend Hours	Total ATMs		Full Service				Cash Only				Census Tracts		Households	Total Businesses	
	#	%	#	#	#	#	#	Total	%	Total	%	Opened	Closed	Total	%	Opened	Closed	#	%	%	%	
Low	Total	3	8.1%	2	0	3	3	Total	5	11.6%	0	0.0%	0	0	5	11.4%	2	0	7	3.4%	2.9%	2.2%
	DTO	0		0	0	0		Stand Alone	2		0	0	0	2		0	0					
	LS	0		0	0																	
Moderate	Total	8	21.6%	1	0	7	8	Total	6	14.0%	0	0.0%	1	1	6	13.6%	0	0	56	27.5%	24.2%	21.7%
	DTO	0		0	0	0		Stand Alone	0		0	0	0	0		0	0					
	LS	0		0	0																	
Middle	Total	17	45.9%	6	0	15	15	Total	19	44.2%	0	0.0%	0	0	20	45.5%	5	0	88	43.1%	46.1%	44.0%
	DTO	0		0	0	0		Stand Alone	4		0	0	0	4		0	2					
	LS	0		0	0																	
Upper	Total	9	24.3%	1	0	8	8	Total	13	30.2%	0	0.0%	0	0	13	29.8%	1	0	53	26.0%	26.8%	32.1%
	DTO	0		0	0	0		Stand Alone	4		0	0	0	4		0	1					
	LS	0		0	0																	
Unknown	Total	0	0.0%	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
	DTO	0		0	0	0		Stand Alone	0		0	0	0	0		0	0					
	LS	0		0	0																	
Totals	Total	37	100.0%	10	0	33	34	Total	43	100.0%	0	0.0%	1	1	44	100.0%	8	0	204	100.0%	100.0%	100.0%
	DTO	0		0	0	0		Stand Alone	10		0	0	0	10		0	3					
	LS	0		0	0																	

DTO - Drive Thru Only

LS - Limited Service

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

\*Based on 2020 census data

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

LPOs not included in totals

The branch distribution in low-income tracts is considered excellent. The distribution of branches at 8.1% exceeds the percentage of low-income tracts (3.4%), households (2.9%), and total businesses (2.2%) in these tracts. The branch distribution in moderate-income tracts is considered good. The distribution of branches at 21.6% falls below the percentage of moderate-income tracts (27.5%), falls slightly below households (24.2%), and is comparable to total businesses (21.7%) in these tracts. Approximately 29.7% of Whitaker's branches serve LMI geographies, compared to 30.9% of total LMI tracts in the AA. Also, five (29.4%) out of 17 branches in middle-income tracts serve distressed middle-income tracts. Therefore, 16 (43.0%) Whitaker's branches serve either LMI or distressed middle-income tracts, compared to 108 (53.0%) total LMI and distressed or underserved middle-income tracts in the AA. As a result, delivery systems are accessible to Whitaker's geographies and individuals of different income levels in Nonmetropolitan Kentucky.

### Community Development Services

Whitaker is a leader in providing community development services in this AA. During the evaluation period, 58 employees assisted 69 organizations totaling 3,594 hours of community development service to local organizations that provide a multitude of services throughout the AA. This represents 88.0% of total service hours, which exceeded the total percentage of branch offices at 84.1%. The hours of service provided in this AA equates to 1.8 ANP.

The following table provides a breakdown of qualified community development service by community development purpose. Employees were involved with organizations and activities

that promote or facilitate community services targeted to LMI individuals, economic development by financing small businesses/small farms, and affordable housing.

Purpose of CD Service	# Services	# Organizations	# Employees	# Hours*
Community Service	400	62	48	2,712
Economic Development	17	4	5	659
Affordable Housing	24	3	5	223
<b>Total</b>	<b>441</b>	<b>69</b>	<b>58</b>	<b>3,594</b>
<i>*Number of hours by expertise may be greater than hours listed in this table if employee(s) provide more than one type of expertise</i>				

Employees provided financial expertise through leadership positions in multiple community organizations that provide services to LMI individuals and families; promote affordable housing, community and economic development, and area revitalization and stabilization. Community development services include 3,214 hours serving on boards and committees, 517 hours of financial literacy, and 390 hours providing technical expertise.

Examples of impactful community development services include but are not limited to:

- Serving on boards/committees
  - An employee serves as a board member and member of the finance committee for a nonprofit that focuses on serving children
  - An employee serves as a board member assisting with fundraising, budgeting, and teaching students for a local nonprofit organization
  - An employee serves as board member and Finance Committee member-performing duties such as reviewing financials, monitoring operating income and expenses, and helping with the budget
- Financial literacy training:
  - Over 100 financial literacy events at least 30 LMI schools or community centers to LMI students or LMI families
  - At least 27 outreach events to LMI seniors to combat elder fraud and financial exploitation
  - At least three homebuyer workshops for potential first-time LMI homebuyers
- Technical Support
  - Developing financial tools and strategies to alleviate poverty
  - Fundraising
  - Reviewing financial statements for nonprofit organizations
  - Writing, reviewing, and/or evaluating grant proposals
  - Allocating scholarship funds
  - Assessing financial capacity for nonprofit to provide county-wide financial literacy training courses

Community contacts emphasized access to small dollar loans for small businesses, wraparound services for LMI individuals and families and distressed or underserved communities, and all

aspects of affordable housing, including financial literacy training. Overall, community development services exhibit excellent responsiveness to credit and community development needs in Nonmetropolitan Kentucky and represent a significant increase in services since previous evaluation.

**METROPOLITAN AREAS**  
*(Limited-scope Review)***DESCRIPTION OF INSTITUTION'S OPERATIONS**

- **Lexington-Fayette MSA**

- As of December 31, 2023, Whitaker operated seven branches in the AA, representing 15.9% of its total branches.<sup>21</sup>
- As of June 30, 2022, Whitaker had \$401.3 million in deposits in this AA, representing a market share of 3.0% and 22.7% of its total deposits.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

Using available facts and data, including performance and demographic information, AA performance was evaluated and compared with Whitaker's overall performance. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendices E and F for information regarding this area.

Assessment Area	Lending Test	Investment Test	Service Test
Lexington-Fayette MSA	Below	Consistent	Below
<i>Performance in the limited-scope AA did not impact to the overall rating</i>			

For the lending test, Whitaker received an Outstanding rating. Performance in the Lexington MSA is below overall performance in Kentucky. Lending activity is adequate. The geographic distribution of loans is good. Small business and HMDA-reportable lending are good and small farm lending is adequate. Gaps in lending were found to be significant. The borrower distribution of HMDA-reportable loans is adequate and distribution to businesses of different revenue sizes is adequate and good to farms of different revenue sizes. Whitaker makes a relatively high level of community development loans. Whitaker also makes limited use of flexible lending practices in the Lexington MSA. These ratings are primarily due to the level of community development lending activities but also significant gaps in lending relative to Whitaker's operational presence in the overall AA.

For the investment test, Whitaker received a High Satisfactory rating. Performance in the Lexington MSA is consistent with overall performance in Kentucky. Qualified investments were in the form of municipal bonds and mortgage-backed securities as well as small dollar donations. The consistent performance is primarily the responsiveness to credit and community development needs in the overall AA relative to Whitaker's operational presence in the overall AA.

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<sup>21</sup> Whitaker closed a branch with an ATM in Lexington (Fayette County) in a middle-income tract on July 21, 2023.



For the service test, Whitaker received an Outstanding rating. Performance is below overall performance in Kentucky. Retail services are accessible, changes in branch locations did not adversely affect the accessibility of its delivery systems, and business hours and services do not vary in a way that inconveniences its AA. Whitaker provides an adequate level of community development services. The below-level performance is due to the extent of community development services provided relative to Whitaker's operational presence in the overall AA.

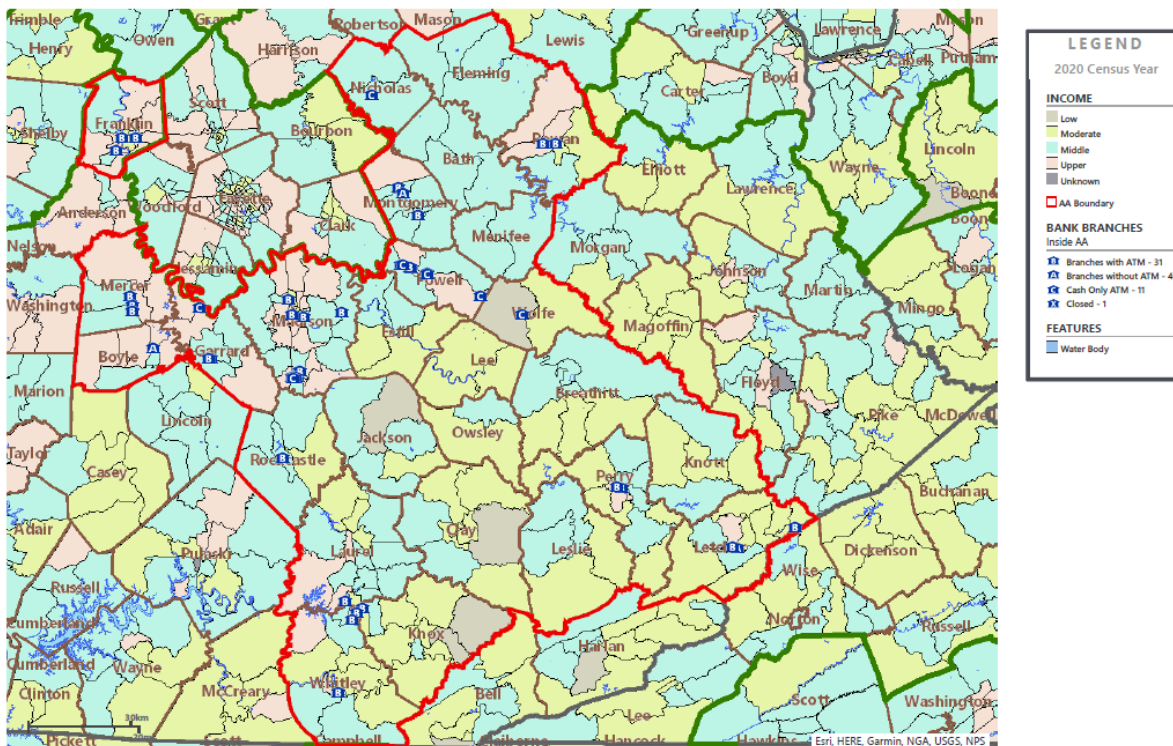
## APPENDIX A

SCOPE OF EXAMINATION		
<b>TIME PERIOD REVIEWED</b>	HMDA-Reportable Loans: July 1, 2019 – December 31, 2022  CRA-Reportable (SB/SF) Loans: July 1, 2019 – December 31, 2022  Community Development Loans, Investments Services: January 7, 2020 – November 27, 2023	
<b>FINANCIAL INSTITUTION</b>  Whitaker Bank, Inc. / Lexington, Kentucky		<b>PRODUCTS REVIEWED</b>  HMDA / Small Business / Small Farm
<b>AFFILIATE(S)</b>	<b>AFFILIATE RELATIONSHIP</b>	<b>PRODUCTS REVIEWED -</b>
Whitaker has no nonbank subsidiaries which provide mortgage lending or investment qualified CRA activities on its behalf.		

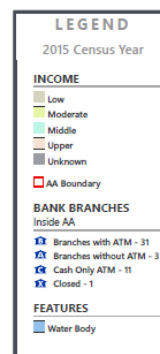
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
<ul style="list-style-type: none"><li>Nonmetropolitan Kentucky</li></ul>	Full-scope review	None	None
<ul style="list-style-type: none"><li>Lexington-Fayette KY MSA</li></ul>	Limited-scope review		

## FULL SCOPE - ASSESSMENT AREA MAPS

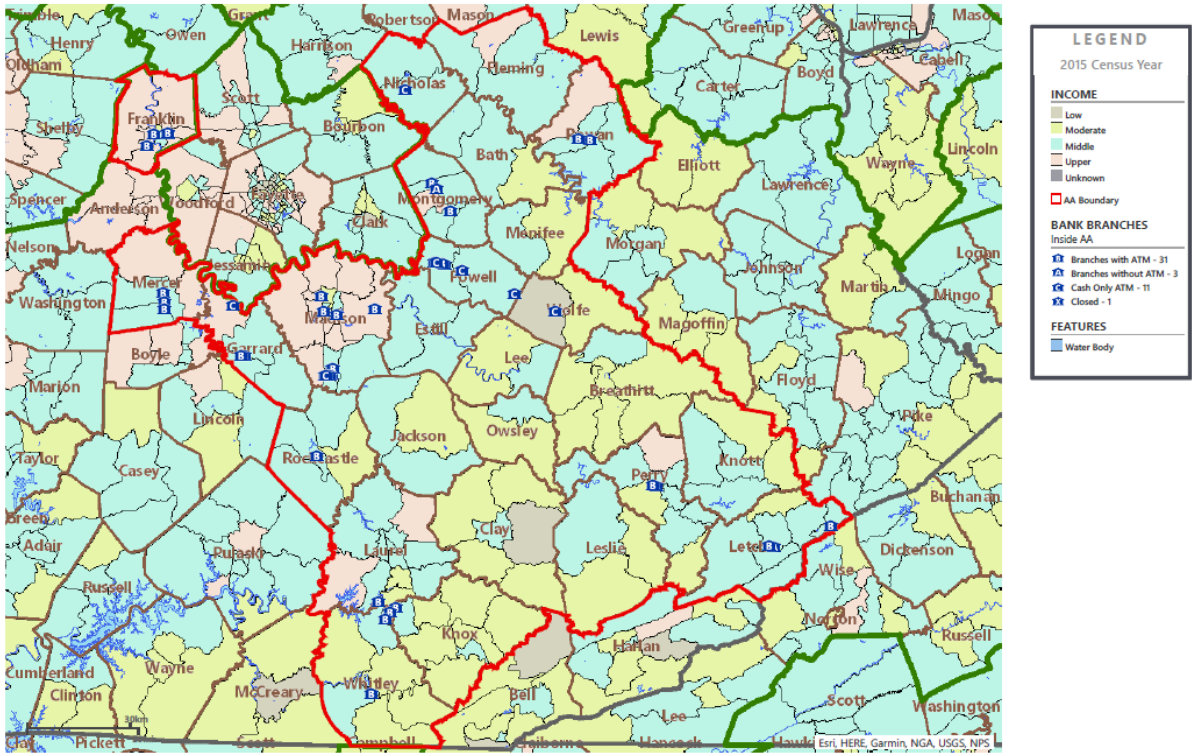
**Assessment Area: 2022 Nonmetropolitan KY**

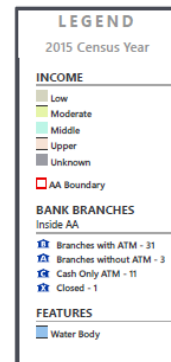


A map of Kentucky counties. The Louisville Metropolitan Area is highlighted with a thick red border. Major cities are marked with blue squares and labeled: Louisville, Jefferson, Bardonia, Clark, Madison, Shelby, and Louisville. The map shows various counties including Franklin, Jefferson, Madison, Clark, Shelby, and Louisville. The red outline encompasses the core urban area and its immediate surroundings.



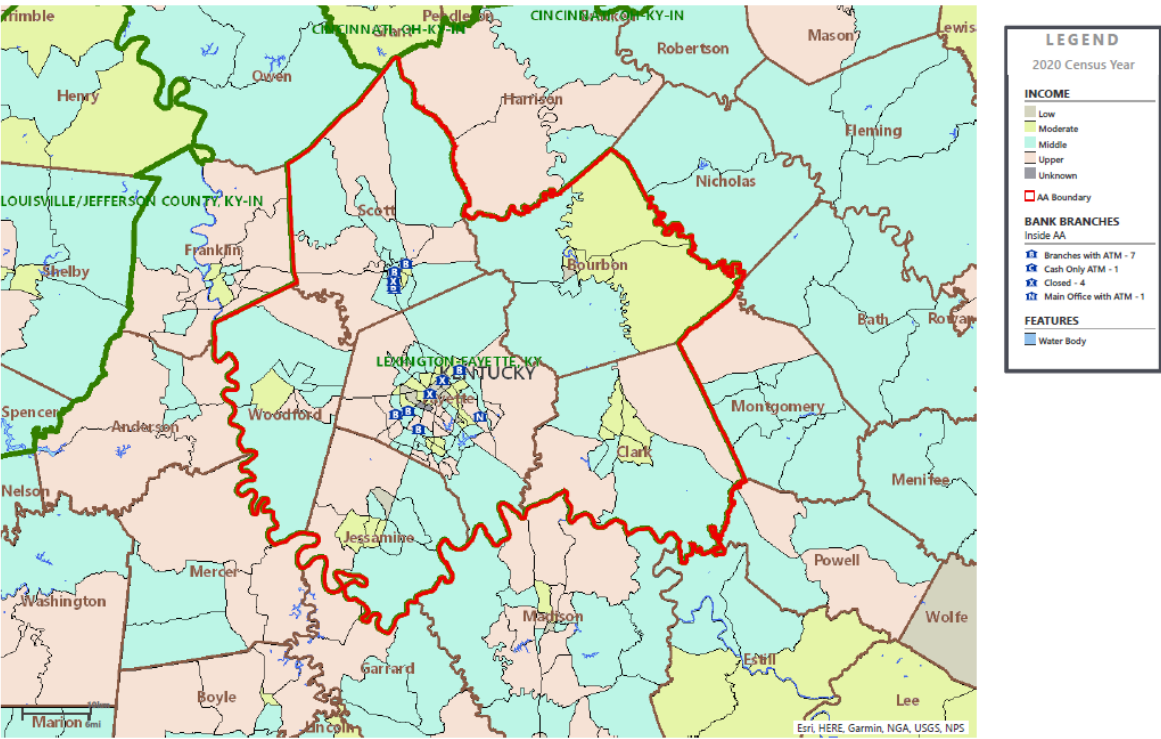
2020 Nonmetropolitan Kentucky





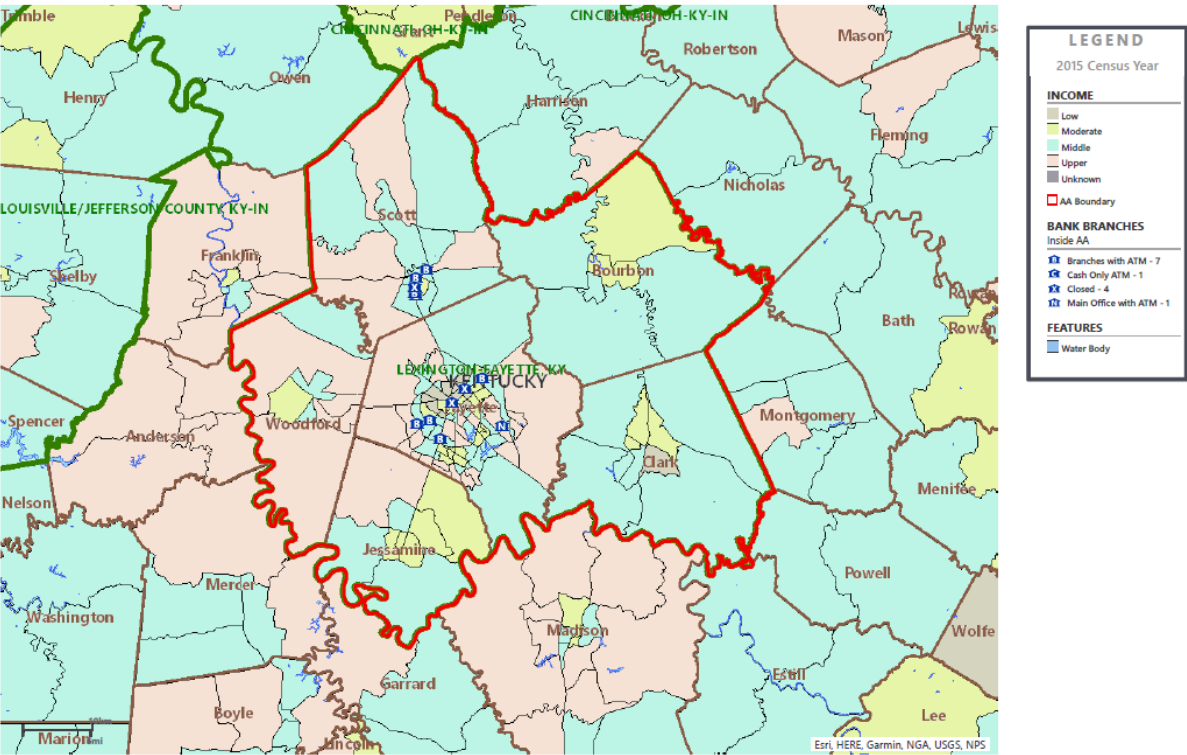
LIMITED SCOPE - ASSESSMENT AREA MAPS

Assessment Area: 2022 Lexington-Fayette, KY MSA #30460

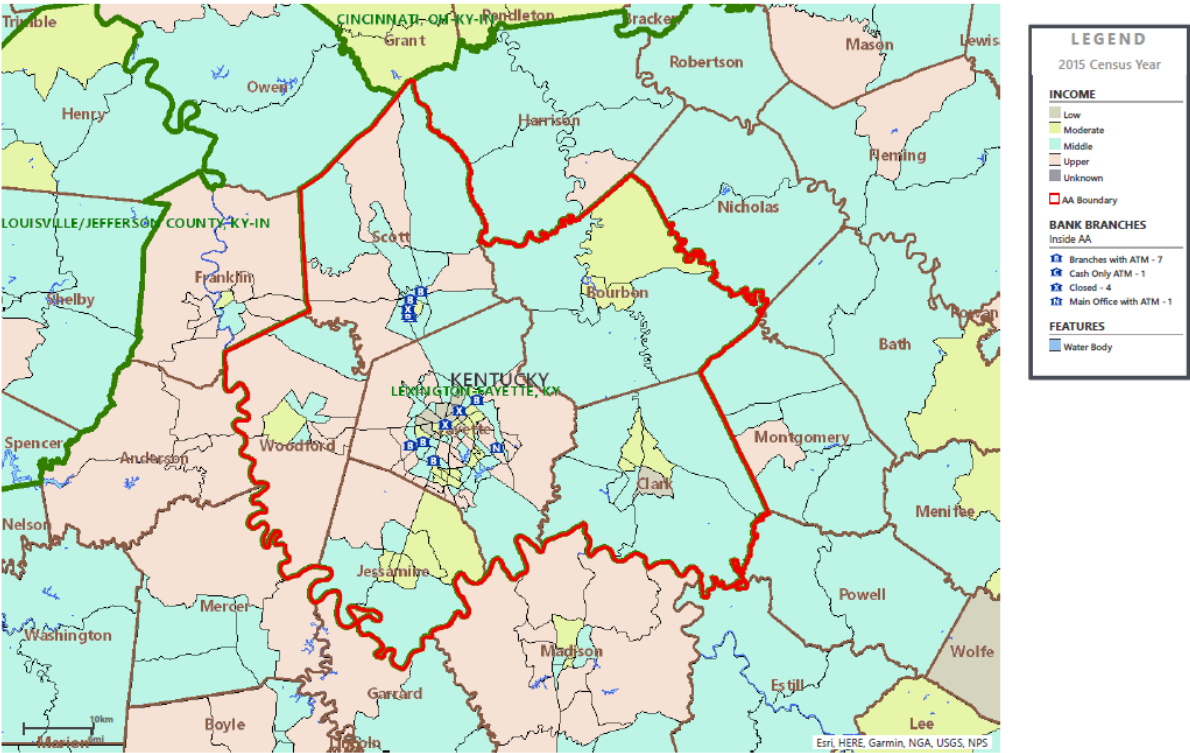




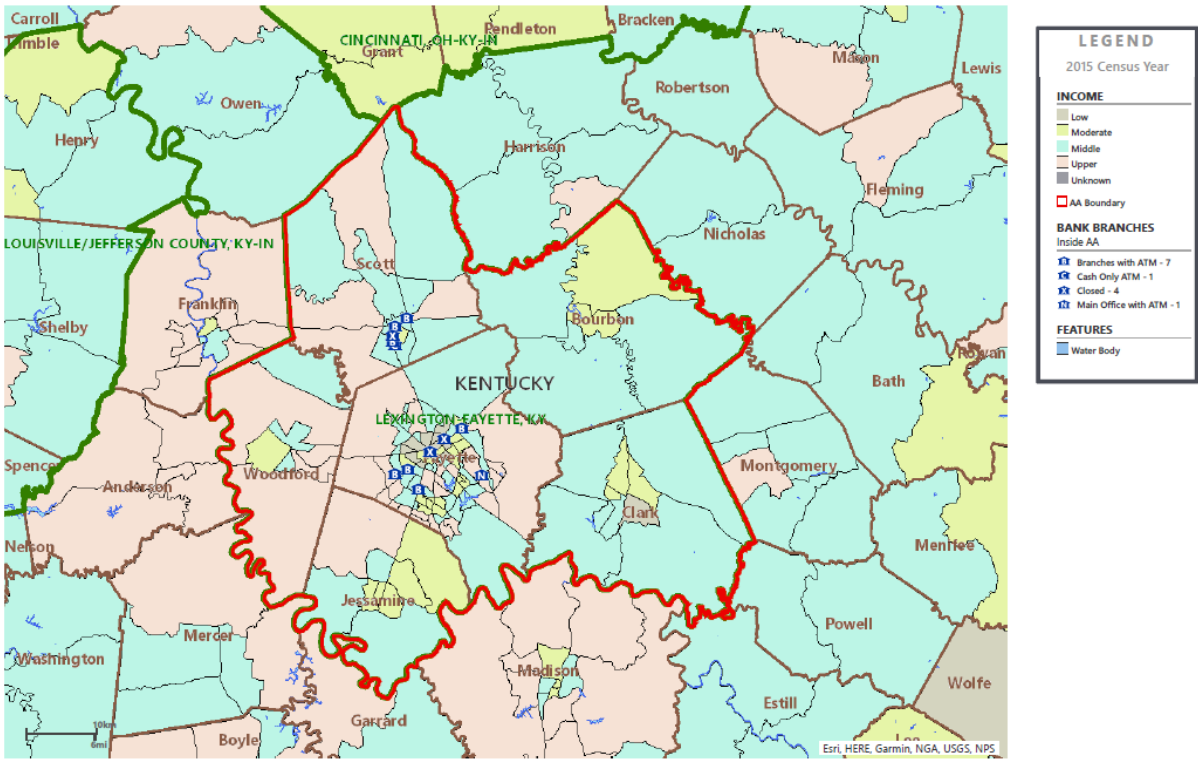
Assessment Area: 2021 Lexington-Fayette, KY MSA #30460



Assessment Area: 2020 Lexington-Fayette, KY MSA #30460



Assessment Area: 2019 Lexington-Fayette, KY MSA #30460



## APPENDIX C

## FULL SCOPE - DEMOGRAPHIC INFORMATION

2022 NONMETROPOLITAN KENTUCKY AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	3.4	4,695	2.9	1,947	41.5	39,228	24.5
Moderate	56	27.5	38,945	24.3	10,519	27	26,053	16.3
Middle	88	43.1	73,506	45.9	11,895	16.2	28,673	17.9
Upper	53	26	43,154	26.9	3,402	7.9	66,346	41.4
Unknown	0	0	0	0	0	0	0	0
Total AA	204	100.0	160,300	100.0	27,763	17.3	160,300	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	8,640	4,064	2.5	47	2,956	34.2	1,620	18.8
Moderate	70,031	39,530	24	56.4	18,307	26.1	12,194	17.4
Middle	128,762	75,374	45.8	58.5	34,475	26.8	18,913	14.7
Upper	71,131	45,674	27.7	64.2	18,143	25.5	7,314	10.3
Unknown	0	0	0	0	0	0	0	0
Total AA	278,564	164,642	100.0	59.1	73,881	26.5	40,041	14.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	418	2.3	387	2.3	23	1.9	8	2.1
Moderate	4,056	21.9	3,627	21.4	314	25.6	115	29.8
Middle	8,086	43.6	7,406	43.8	519	42.3	161	41.7
Upper	5,967	32.2	5,494	32.5	371	30.2	102	26.4
Unknown	0	0	0	0	0	0	0	0
Total AA	18,527	100.0	16,914	100.0	1,227	100.0	386	100.0
Percentage of Total Businesses:				91.3		6.6		2.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	8	1.1	8	1.1	0	0	0	0
Moderate	118	16.7	116	16.6	0	0	2	66.7
Middle	369	52.3	366	52.4	2	50	1	33.3
Upper	211	29.9	209	29.9	2	50	0	0
Unknown	0	0	0	0	0	0	0	0
Total AA	706	100.0	699	100.0	4	100.0	3	100.0
Percentage of Total Farms:				99.0		0.6		0.4
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Whitaker Bank, Inc.  
Lexington, KentuckyCRA Public Evaluation  
November 27, 2023

2021 NONMETROPOLITAN KENTUCKY AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	1.3	1,723	1.1	764	44.3	40,339	25.4
Moderate	41	27	34,279	21.6	9,354	27.3	25,633	16.1
Middle	80	52.6	87,970	55.3	17,842	20.3	27,454	17.3
Upper	29	19.1	35,075	22.1	3,409	9.7	65,621	41.3
Unknown	0	0	0	0	0	0	0	0
<b>Total AA</b>	<b>152</b>	<b>100.0</b>	<b>159,047</b>	<b>100.0</b>	<b>31,369</b>	<b>19.7</b>	<b>159,047</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,641	1,988	1.2	54.6	956	26.3	697	19.1
Moderate	60,634	35,245	21.8	58.1	15,608	25.7	9,781	16.1
Middle	152,982	88,347	54.7	57.7	44,185	28.9	20,450	13.4
Upper	55,657	35,887	22.2	64.5	14,300	25.7	5,470	9.8
Unknown	0	0	0	0	0	0	0	0
<b>Total AA</b>	<b>272,914</b>	<b>161,467</b>	<b>100.0</b>	<b>59.2</b>	<b>75,049</b>	<b>27.5</b>	<b>36,398</b>	<b>13.3</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	142	0.8	128	0.7	10	0.8	4	1.1
Moderate	3,134	16.8	2,818	16.5	226	18.1	90	24
Middle	10,577	56.6	9,655	56.6	722	57.8	200	53.3
Upper	4,838	25.9	4,466	26.2	291	23.3	81	21.6
Unknown	0	0	0	0	0	0	0	0
<b>Total AA</b>	<b>18,691</b>	<b>100.0</b>	<b>17,067</b>	<b>100.0</b>	<b>1,249</b>	<b>100.0</b>	<b>375</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.3</b>		<b>6.7</b>		<b>2.0</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	3	0.4	3	0.4	0	0	0	0
Moderate	121	16.7	120	16.7	0	0	1	33.3
Middle	386	53.3	381	53.1	3	75	2	66.7
Upper	214	29.6	213	29.7	1	25	0	0
Unknown	0	0	0	0	0	0	0	0
<b>Total AA</b>	<b>724</b>	<b>100.0</b>	<b>717</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>99.0</b>		<b>0.6</b>		<b>0.4</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

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2020 NONMETROPOLITAN KENTUCKY AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	1.3	1,723	1.1	764	44.3	40,339	25.4
Moderate	41	27	34,279	21.6	9,354	27.3	25,633	16.1
Middle	80	52.6	87,970	55.3	17,842	20.3	27,454	17.3
Upper	29	19.1	35,075	22.1	3,409	9.7	65,621	41.3
Unknown	0	0	0	0	0	0	0	0
Total AA	152	100.0	159,047	100.0	31,369	19.7	159,047	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,641	1,988	1.2	54.6	956	26.3	697	19.1
Moderate	60,634	35,245	21.8	58.1	15,608	25.7	9,781	16.1
Middle	152,982	88,347	54.7	57.7	44,185	28.9	20,450	13.4
Upper	55,657	35,887	22.2	64.5	14,300	25.7	5,470	9.8
Unknown	0	0	0	0	0	0	0	0
Total AA	272,914	161,467	100.0	59.2	75,049	27.5	36,398	13.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	143	0.7	128	0.7	11	0.8	4	1.1
Moderate	3,210	16.7	2,880	16.5	240	18.3	90	23.7
Middle	10,911	56.9	9,939	56.8	771	58.7	201	53
Upper	4,921	25.7	4,546	26	291	22.2	84	22.2
Unknown	0	0	0	0	0	0	0	0
Total AA	19,185	100.0	17,493	100.0	1,313	100.0	379	100.0
Percentage of Total Businesses:			91.2		6.8		2.0	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	3	0.4	3	0.4	0	0	0	0
Moderate	124	16.2	121	16.1	1	12.5	2	50
Middle	412	53.9	407	54.1	3	37.5	2	50
Upper	225	29.5	221	29.4	4	50	0	0
Unknown	0	0	0	0	0	0	0	0
Total AA	764	100.0	752	100.0	8	100.0	4	100.0
Percentage of Total Farms:			98.4		1.0		0.5	
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

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2019 NONMETROPOLITAN KENTUCKY AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	1.4	1,723	1.1	764	44.3	38,981	25.7
Moderate	41	28.3	34,279	22.6	9,354	27.3	24,561	16.2
Middle	76	52.4	84,101	55.4	17,301	20.6	26,220	17.3
Upper	26	17.9	31,837	21	3,133	9.8	62,178	40.9
Unknown	0	0	0	0	0	0	0	0
Total AA	145	100.0	151,940	100.0	30,552	20.1	151,940	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,641	1,988	1.3	54.6	956	26.3	697	19.1
Moderate	60,634	35,245	22.9	58.1	15,608	25.7	9,781	16.1
Middle	145,659	84,295	54.7	57.9	41,647	28.6	19,717	13.5
Upper	50,595	32,704	21.2	64.6	13,028	25.7	4,863	9.6
Unknown	0	0	0	0	0	0	0	0
Total AA	260,529	154,232	100.0	59.2	71,239	27.3	35,058	13.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	140	0.8	126	0.8	11	0.9	3	0.8
Moderate	3,219	17.8	2,887	17.5	241	19.3	91	24.5
Middle	10,364	57.2	9,427	57.1	745	59.8	192	51.8
Upper	4,392	24.2	4,058	24.6	249	20	85	22.9
Unknown	0	0	0	0	0	0	0	0
Total AA	18,115	100.0	16,498	100.0	1,246	100.0	371	100.0
Percentage of Total Businesses:				91.1		6.9		2.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	3	0.4	3	0.4	0	0	0	0
Moderate	124	16.1	121	16	1	14.3	2	50
Middle	441	57.3	435	57.4	4	57.1	2	50
Upper	201	26.1	199	26.3	2	28.6	0	0
Unknown	0	0	0	0	0	0	0	0
Total AA	769	100.0	758	100.0	7	100.0	4	100.0
Percentage of Total Farms:				98.6		0.9		0.5
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

## APPENDIX D

## FULL-SCOPE – LENDING TABLES

## Small Business Lending Tables

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Nonmetropolitan Kentucky					
Geographic Income Level	Bank Loans*				Total Businesses %
	#	#%	\$(000)	\$%	
Low	16	3.1	1,196	2.4	2.3
Moderate	52	10.2	5,954	12.2	21.9
Middle	253	49.4	23,710	48.4	43.6
Upper	191	37.3	18,104	37.0	32.2
Unknown	0	0.0	0	0.0	0.0
<b>Total</b>	<b>512</b>	<b>100.0</b>	<b>48,964</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2020 U.S. Census Bureau Decennial Census					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Nonmetropolitan Kentucky					
	Bank Loans*				Total Businesses %
	#	#%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	391	76.4	28,654	58.5	91.3
Over \$1 Million	77	15.0	17,486	35.7	6.6
Revenue Unknown	44	8.6	2,824	5.8	2.1
Total	512	100.0	48,964	100.0	100.0
By Loan Size					
\$100,000 or Less	398	77.7	10,932	22.3	
\$100,001 - \$250,000	58	11.3	9,336	19.1	
\$250,001 - \$1 Million	56	10.9	28,696	58.6	
Total	512	100.0	48,964	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	318	81.3	8,318	29.0	
\$100,001 - \$250,000	46	11.8	7,214	25.2	
\$250,001 - \$1 Million	27	6.9	13,122	45.8	
Total	391	100.0	28,654	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2020 U.S. Census Bureau Decennial Census					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					



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Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: Nonmetropolitan Kentucky							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	11	0.8	0.6	237	0.4	0.6	0.8
Moderate	94	7.1	15.5	5,300	8.4	12.7	16.8
Middle	870	66.2	56.5	40,702	64.6	56.0	56.6
Upper	340	25.9	26.5	16,810	26.7	30.4	25.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	1,315	100.0	100.0	63,049	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2021 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Nonmetropolitan Kentucky							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	414	31.5	45.8	29,334	46.5	36.9	91.3
Over \$1 Million	52	4.0		15,069	23.9		6.7
Revenue Unknown	849	64.6		18,646	29.6		2.0
Total	1,315	100.0		63,049	100.0		100.0
By Loan Size							
\$100,000 or Less	1,181	89.8	94.4	20,687	32.8	42.0	
\$100,001 - \$250,000	73	5.6	3.3	11,877	18.8	18.2	
\$250,001 - \$1 Million	61	4.6	2.3	30,485	48.4	39.7	
Total	1,315	100.0	100.0	63,049	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	347	83.8		9,065	30.9		
\$100,001 - \$250,000	38	9.2		6,319	21.5		
\$250,001 - \$1 Million	29	7.0		13,950	47.6		
Total	414	100.0		29,334	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2020 Small Business Lending By Income Level of Geography							
Assessment Area: Nonmetropolitan Kentucky							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	15	2.3	0.5	400	0.9	0.7	0.7
Moderate	74	11.4	16.1	6,098	14.1	13.9	16.7
Middle	439	67.5	54.8	30,956	71.8	55.4	56.9
Upper	122	18.8	27.7	5,661	13.1	29.4	25.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	650	100.0	100.0	43,115	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2020 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Nonmetropolitan Kentucky							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	207	31.8	32.2	11,859	27.5	26.3	91.2
Over \$1 Million	45	6.9		11,642	27.0		6.8
Revenue Unknown	398	61.2		19,614	45.5		2.0
Total	650	100.0		43,115	100.0		100.0
By Loan Size							
\$100,000 or Less	551	84.8	90.3	14,275	33.1	36.0	
\$100,001 - \$250,000	61	9.4	6.0	9,330	21.6	21.8	
\$250,001 - \$1 Million	38	5.8	3.7	19,510	45.3	42.2	
Total	650	100.0	100.0	43,115	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	173	83.6		4,086	34.5		
\$100,001 - \$250,000	24	11.6		3,533	29.8		
\$250,001 - \$1 Million	10	4.8		4,240	35.8		
Total	207	100.0		11,859	100.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: Nonmetropolitan Kentucky							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	2	1.5	0.6	22	0.2	0.8	0.8
Moderate	10	7.4	15.2	187	1.7	13.9	17.8
Middle	102	75.0	54.6	8,421	77.9	56.7	57.2
Upper	22	16.2	26.7	2,182	20.2	27.3	24.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	136	100.0	100.0	10,812	100.0	100.0	100.0
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Nonmetropolitan Kentucky							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	94	69.1	40.6	5,406	50.0	36.3	91.1
Over \$1 Million	20	14.7		4,904	45.4		6.9
Revenue Unknown	22	16.2		502	4.6		2.0
Total	136	100.0		10,812	100.0		100.0
By Loan Size							
\$100,000 or Less	111	81.6	94.5	2,675	24.7	43.7	
\$100,001 - \$250,000	14	10.3	3.2	2,404	22.2	18.3	
\$250,001 - \$1 Million	11	8.1	2.3	5,733	53.0	38.0	
Total	136	100.0	100.0	10,812	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	80	85.1		1,853	34.3		
\$100,001 - \$250,000	9	9.6		1,479	27.4		
\$250,001 - \$1 Million	5	5.3		2,074	38.4		
Total	94	100.0	5,406	100.0			
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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## HMDA Lending Tables

Distribution of 2022 HMDA Reportable Loans By Income Level of Geography Assessment Area: Nonmetropolitan Kentucky							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	7	3.3	1.5	463	1.5	1.3	2.5
Moderate	19	9.0	13.3	1,302	4.1	10.4	24.0
Middle	97	45.8	46.4	11,423	36.1	42.1	45.8
Upper	89	42.0	38.8	18,460	58.3	46.2	27.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	212	100.0	100.0	31,648	100.0	100.0	100.0
Refinance Loans							
Low	5	2.3	1.0	544	2.1	0.9	2.5
Moderate	20	9.2	11.5	1,430	5.5	9.4	24.0
Middle	97	44.5	46.3	12,411	47.9	43.1	45.8
Upper	96	44.0	41.2	11,547	44.5	46.6	27.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	218	100.0	100.0	25,932	100.0	100.0	100.0
Home Improvement Loans							
Low	5	4.5	1.1	447	6.1	1.4	2.5
Moderate	6	5.4	10.3	192	2.6	8.1	24.0
Middle	51	45.5	42.8	2,829	38.4	40.0	45.8
Upper	50	44.6	45.8	3,904	53.0	50.6	27.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	112	100.0	100.0	7,372	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	2	10.0	3.2	1,791	10.4	2.2	3.8
Moderate	1	5.0	12.8	57	0.3	9.1	22.6
Middle	11	55.0	38.5	11,009	63.7	41.0	39.8
Upper	6	30.0	45.5	4,417	25.6	47.7	33.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	20	100.0	100.0	17,274	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	23	3.6	1.3	3,387	3.9	1.3	2.5
Moderate	51	8.1	12.3	3,257	3.7	10.0	24.0
Middle	283	44.8	45.6	39,406	45.4	42.1	45.8
Upper	275	43.5	40.8	40,842	47.0	46.7	27.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	632	100.0	100.0	86,892	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2022 HMDA Reportable Loans By Income Level of Geography							
Assessment Area: Nonmetropolitan Kentucky							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	0.7	0	0.0	0.5	2.5
Moderate	0	0.0	7.2	0	0.0	7.0	24.0
Middle	0	0.0	36.6	0	0.0	33.5	45.8
Upper	0	0.0	55.5	0	0.0	59.0	27.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	4	5.7	1.7	142	3.0	0.7	2.5
Moderate	5	7.1	10.0	276	5.9	11.8	24.0
Middle	27	38.6	47.6	1,734	37.2	44.0	45.8
Upper	34	48.6	40.6	2,514	53.9	43.5	27.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	70	100.0	100.0	4,666	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	2.5
Moderate	0	0.0	22.7	0	0.0	18.9	24.0
Middle	0	0.0	48.0	0	0.0	52.7	45.8
Upper	0	0.0	29.3	0	0.0	28.4	27.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2022 HMDA Reportable Loans By Borrower Income Level Assessment Area: Nonmetropolitan Kentucky							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	14	6.6	3.7	863	2.7	1.7	24.5
Moderate	38	17.9	17.5	3,476	11.0	11.7	16.3
Middle	46	21.7	24.9	5,445	17.2	21.8	17.9
Upper	91	42.9	35.4	17,692	55.9	45.2	41.4
Unknown	23	10.8	18.6	4,172	13.2	19.6	0.0
Total	212	100.0	100.0	31,648	100.0	100.0	100.0
Refinance Loans							
Low	24	11.0	6.4	1,471	5.7	3.2	24.5
Moderate	26	11.9	17.4	1,960	7.6	12.6	16.3
Middle	46	21.1	24.8	4,676	18.0	22.5	17.9
Upper	106	48.6	42.4	15,873	61.2	50.4	41.4
Unknown	16	7.3	9.0	1,952	7.5	11.3	0.0
Total	218	100.0	100.0	25,932	100.0	100.0	100.0
Home Improvement Loans							
Low	10	8.9	5.6	348	4.7	2.8	24.5
Moderate	15	13.4	11.9	463	6.3	8.5	16.3
Middle	28	25.0	24.5	1,273	17.3	19.4	17.9
Upper	53	47.3	54.8	4,829	65.5	64.7	41.4
Unknown	6	5.4	3.2	459	6.2	4.5	0.0
Total	112	100.0	100.0	7,372	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	56	9.2	4.8	3,026	4.3	2.2	24.5
Moderate	92	15.0	16.7	6,816	9.8	11.7	16.3
Middle	136	22.2	24.7	12,528	18.0	21.7	17.9
Upper	277	45.3	39.7	40,349	58.0	47.5	41.4
Unknown	51	8.3	14.3	6,899	9.9	16.9	0.0
Total	612	100.0	100.0	69,618	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

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Distribution of 2022 HMDA Reportable Loans By Borrower Income Level							
Assessment Area: Nonmetropolitan Kentucky							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	6.5	0	0.0	3.9	24.5
Moderate	0	0.0	11.8	0	0.0	7.3	16.3
Middle	0	0.0	25.0	0	0.0	17.6	17.9
Upper	0	0.0	55.1	0	0.0	69.2	41.4
Unknown	0	0.0	1.5	0	0.0	1.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	8	11.4	10.0	344	7.4	5.6	24.5
Moderate	13	18.6	16.6	917	19.7	16.2	16.3
Middle	16	22.9	23.6	1,134	24.3	19.0	17.9
Upper	27	38.6	44.1	1,955	41.9	55.3	41.4
Unknown	6	8.6	5.7	316	6.8	3.9	0.0
Total	70	100.0	100.0	4,666	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	24.5
Moderate	0	0.0	1.3	0	0.0	2.6	16.3
Middle	0	0.0	0.0	0	0.0	0.0	17.9
Upper	0	0.0	0.0	0	0.0	0.0	41.4
Unknown	0	0.0	98.7	0	0.0	97.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2021 HMDA Reportable Loans By Income Level of Geography Assessment Area: Nonmetropolitan Kentucky							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	6	3.1	0.6	697	3.1	0.4	1.2
Moderate	17	8.9	13.3	1,314	5.9	10.8	21.8
Middle	124	64.6	53.9	12,853	57.9	49.9	54.7
Upper	45	23.4	32.2	7,343	33.1	38.8	22.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	192	100.0	100.0	22,207	100.0	100.0	100.0
Refinance Loans							
Low	4	2.9	0.3	387	2.5	0.3	1.2
Moderate	11	8.0	9.8	925	6.0	8.0	21.8
Middle	99	71.7	47.8	11,211	73.1	43.8	54.7
Upper	24	17.4	42.1	2,823	18.4	47.9	22.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	138	100.0	100.0	15,346	100.0	100.0	100.0
Home Improvement Loans							
Low	2	14.3	0.6	67	8.6	0.9	1.2
Moderate	2	14.3	12.3	56	7.2	12.2	21.8
Middle	9	64.3	45.8	602	77.0	43.4	54.7
Upper	1	7.1	41.3	57	7.3	43.6	22.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	14	100.0	100.0	782	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0.4
Moderate	0	0.0	12.9	0	0.0	7.9	19.1
Middle	6	66.7	46.8	10,673	50.9	62.0	58.1
Upper	3	33.3	40.3	10,276	49.1	30.1	22.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	9	100.0	100.0	20,949	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	12	3.3	0.4	1,151	1.9	0.3	1.2
Moderate	31	8.4	11.7	2,301	3.8	9.5	21.8
Middle	250	67.8	50.6	35,907	59.7	48.0	54.7
Upper	76	20.6	37.3	20,821	34.6	42.1	22.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	369	100.0	100.0	60,180	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



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Distribution of 2021 HMDA Reportable Loans By Income Level of Geography							
Assessment Area: Nonmetropolitan Kentucky							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	1.2
Moderate	0	0.0	8.4	0	0.0	6.7	21.8
Middle	0	0.0	41.3	0	0.0	35.4	54.7
Upper	0	0.0	50.3	0	0.0	57.9	22.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	1.2
Moderate	1	6.3	13.8	6	0.7	14.5	21.8
Middle	12	75.0	48.5	568	63.4	46.1	54.7
Upper	3	18.8	37.7	322	35.9	39.4	22.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	16	100.0	100.0	896	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	1.2
Moderate	0	0.0	13.0	0	0.0	10.9	21.8
Middle	0	0.0	54.8	0	0.0	51.2	54.7
Upper	0	0.0	32.2	0	0.0	38.0	22.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2021 HMDA Reportable Loans By Borrower Income Level Assessment Area: Nonmetropolitan Kentucky							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	5	2.6	3.1	312	1.4	1.5	25.4
Moderate	31	16.1	15.9	2,095	9.4	10.7	16.1
Middle	41	21.4	22.8	3,995	18.0	20.1	17.3
Upper	92	47.9	37.9	12,068	54.3	47.3	41.3
Unknown	23	12.0	20.3	3,737	16.8	20.4	0.0
Total	192	100.0	100.0	22,207	100.0	100.0	100.0
Refinance Loans							
Low	7	5.1	2.9	481	3.1	1.5	25.4
Moderate	29	21.0	10.0	2,412	15.7	6.6	16.1
Middle	22	15.9	19.2	1,677	10.9	15.7	17.3
Upper	66	47.8	47.8	7,583	49.4	53.5	41.3
Unknown	14	10.1	20.1	3,193	20.8	22.7	0.0
Total	138	100.0	100.0	15,346	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.6	0	0.0	1.9	25.4
Moderate	7	50.0	11.2	383	49.0	8.3	16.1
Middle	1	7.1	18.2	16	2.0	14.4	17.3
Upper	3	21.4	61.6	255	32.6	67.0	41.3
Unknown	3	21.4	5.3	128	16.4	8.4	0.0
Total	14	100.0	100.0	782	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	15	4.2	3.0	893	2.3	1.5	25.4
Moderate	68	18.9	13.0	4,921	12.5	8.8	16.1
Middle	68	18.9	20.8	6,001	15.3	18.0	17.3
Upper	169	46.9	43.3	20,358	51.9	50.3	41.3
Unknown	40	11.1	19.8	7,058	18.0	21.4	0.0
Total	360	100.0	100.0	39,231	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

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Distribution of 2021 HMDA Reportable Loans By Borrower Income Level							
Assessment Area: Nonmetropolitan Kentucky							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	4.2	0	0.0	2.0	25.4
Moderate	0	0.0	12.6	0	0.0	6.6	16.1
Middle	0	0.0	18.7	0	0.0	14.7	17.3
Upper	0	0.0	62.9	0	0.0	72.4	41.3
Unknown	0	0.0	1.6	0	0.0	4.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	3	18.8	8.4	100	11.2	5.5	25.4
Moderate	1	6.3	12.6	31	3.5	10.6	16.1
Middle	4	25.0	25.7	313	34.9	23.3	17.3
Upper	8	50.0	50.9	452	50.4	57.1	41.3
Unknown	0	0.0	2.4	0	0.0	3.4	0.0
Total	16	100.0	100.0	896	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	25.4
Moderate	0	0.0	0.7	0	0.0	0.7	16.1
Middle	0	0.0	2.1	0	0.0	1.6	17.3
Upper	0	0.0	0.0	0	0.0	0.0	41.3
Unknown	0	0.0	97.3	0	0.0	97.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2020 HMDA Reportable Loans By Income Level of Geography							
Assessment Area: Nonmetropolitan Kentucky							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	12	9.0	0.5	935	6.6	0.3	1.2
Moderate	12	9.0	11.6	760	5.3	9.2	21.8
Middle	78	58.2	53.1	7,512	52.7	48.3	54.7
Upper	32	23.9	34.8	5,051	35.4	42.1	22.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	134	100.0	100.0	14,258	100.0	100.0	100.0
Refinance Loans							
Low	6	6.3	0.4	542	5.0	0.4	1.2
Moderate	2	2.1	9.5	194	1.8	7.9	21.8
Middle	70	72.9	47.2	7,456	68.4	43.0	54.7
Upper	18	18.8	42.9	2,716	24.9	48.7	22.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	96	100.0	100.0	10,908	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.5	0	0.0	0.4	1.2
Moderate	0	0.0	11.1	0	0.0	11.0	21.8
Middle	7	100.0	43.1	231	100.0	43.7	54.7
Upper	0	0.0	45.2	0	0.0	44.8	22.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	7	100.0	100.0	231	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0.4
Moderate	0	0.0	10.3	0	0.0	11.5	19.1
Middle	6	75.0	52.6	1,382	61.2	58.0	58.1
Upper	2	25.0	37.1	876	38.8	30.5	22.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	8	100.0	100.0	2,258	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	20	7.7	0.4	1,534	5.4	0.3	1.2
Moderate	16	6.2	10.7	1,102	3.9	8.8	21.8
Middle	167	64.5	50.1	16,847	59.4	46.3	54.7
Upper	56	21.6	38.8	8,860	31.3	44.7	22.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	259	100.0	100.0	28,343	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2020 HMDA Reportable Loans By Income Level of Geography							
Assessment Area: Nonmetropolitan Kentucky							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	1.2
Moderate	0	0.0	11.6	0	0.0	7.5	21.8
Middle	0	0.0	39.9	0	0.0	34.1	54.7
Upper	0	0.0	48.5	0	0.0	58.3	22.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	2	14.3	1.4	57	8.3	0.5	1.2
Moderate	2	14.3	15.6	148	21.5	12.8	21.8
Middle	6	42.9	51.1	266	38.7	52.4	54.7
Upper	4	28.6	31.2	217	31.5	32.7	22.2
Unknown	0	0.0	0.7	0	0.0	1.6	0.0
Total	14	100.0	100.0	688	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.3	0	0.0	0.2	1.2
Moderate	0	0.0	12.9	0	0.0	11.0	21.8
Middle	0	0.0	58.6	0	0.0	57.0	54.7
Upper	0	0.0	28.2	0	0.0	31.8	22.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2020 HMDA Reportable Loans By Borrower Income Level Assessment Area: Nonmetropolitan Kentucky							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	12	9.0	3.5	613	4.3	1.7	25.4
Moderate	23	17.2	16.8	1,641	11.5	11.3	16.1
Middle	18	13.4	24.0	1,535	10.8	20.9	17.3
Upper	63	47.0	41.9	8,736	61.3	52.6	41.3
Unknown	18	13.4	13.8	1,733	12.2	13.6	0.0
Total	134	100.0	100.0	14,258	100.0	100.0	100.0
Refinance Loans							
Low	7	7.3	2.0	399	3.7	0.9	25.4
Moderate	14	14.6	8.2	955	8.8	5.1	16.1
Middle	14	14.6	16.4	1,262	11.6	12.4	17.3
Upper	56	58.3	51.2	7,784	71.4	56.6	41.3
Unknown	5	5.2	22.3	508	4.7	25.0	0.0
Total	96	100.0	100.0	10,908	100.0	100.0	100.0
Home Improvement Loans							
Low	1	14.3	4.6	29	12.6	2.4	25.4
Moderate	2	28.6	11.6	53	22.9	7.7	16.1
Middle	4	57.1	14.4	149	64.5	11.8	17.3
Upper	0	0.0	65.5	0	0.0	73.2	41.3
Unknown	0	0.0	3.9	0	0.0	4.9	0.0
Total	7	100.0	100.0	231	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	20	8.0	2.8	1,041	4.0	1.3	25.4
Moderate	42	16.7	12.4	2,745	10.5	8.2	16.1
Middle	41	16.3	19.8	3,098	11.9	16.4	17.3
Upper	125	49.8	46.5	16,960	65.0	54.3	41.3
Unknown	23	9.2	18.5	2,241	8.6	19.8	0.0
Total	251	100.0	100.0	26,085	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

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Distribution of 2020 HMDA Reportable Loans By Borrower Income Level							
Assessment Area: Nonmetropolitan Kentucky							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	4.3	0	0.0	2.3	25.4
Moderate	0	0.0	9.6	0	0.0	6.8	16.1
Middle	0	0.0	21.3	0	0.0	15.7	17.3
Upper	0	0.0	62.8	0	0.0	73.8	41.3
Unknown	0	0.0	2.0	0	0.0	1.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	5.7	0	0.0	3.3	25.4
Moderate	3	21.4	14.9	96	14.0	7.7	16.1
Middle	5	35.7	17.7	152	22.1	13.3	17.3
Upper	6	42.9	56.7	440	64.0	69.8	41.3
Unknown	0	0.0	5.0	0	0.0	5.9	0.0
Total	14	100.0	100.0	688	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	25.4
Moderate	0	0.0	1.6	0	0.0	1.2	16.1
Middle	0	0.0	0.9	0	0.0	1.2	17.3
Upper	0	0.0	2.2	0	0.0	2.9	41.3
Unknown	0	0.0	95.3	0	0.0	94.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2019 HMDA Reportable Loans By Income Level of Geography Assessment Area: Nonmetropolitan Kentucky							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	1	2.2	0.4	27	0.7	0.3	1.3
Moderate	3	6.7	11.4	272	7.5	8.6	22.9
Middle	35	77.8	53.2	2,594	71.1	49.2	54.7
Upper	6	13.3	35.0	753	20.7	41.9	21.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	45	100.0	100.0	3,646	100.0	100.0	100.0
Refinance Loans							
Low	1	3.4	0.6	67	2.4	0.6	1.3
Moderate	2	6.9	11.7	77	2.7	8.9	22.9
Middle	21	72.4	47.5	2,398	84.6	42.7	54.7
Upper	5	17.2	40.1	291	10.3	47.9	21.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	29	100.0	100.0	2,833	100.0	100.0	100.0
Home Improvement Loans							
Low	1	10.0	0.8	36	8.2	0.6	1.3
Moderate	3	30.0	13.6	99	22.4	11.9	22.9
Middle	5	50.0	42.6	261	59.2	39.6	54.7
Upper	1	10.0	43.0	45	10.2	47.9	21.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	10	100.0	100.0	441	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0.5
Moderate	1	50.0	13.3	157	75.1	11.3	19.9
Middle	1	50.0	56.1	52	24.9	55.2	57.7
Upper	0	0.0	30.6	0	0.0	33.5	21.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	209	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	4	4.5	0.5	161	2.2	0.4	1.3
Moderate	9	10.1	11.5	605	8.4	8.9	22.9
Middle	64	71.9	50.8	5,362	74.3	47.1	54.7
Upper	12	13.5	37.2	1,089	15.1	43.6	21.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	89	100.0	100.0	7,217	100.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



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Distribution of 2019 HMDA Reportable Loans By Income Level of Geography							
Assessment Area: Nonmetropolitan Kentucky							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	##%	##%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	1.3
Moderate	0	0.0	8.5	0	0.0	6.7	22.9
Middle	0	0.0	44.8	0	0.0	36.9	54.7
Upper	0	0.0	46.6	0	0.0	56.4	21.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	33.3	1.3	31	35.2	0.5	1.3
Moderate	0	0.0	13.0	0	0.0	11.2	22.9
Middle	2	66.7	55.8	57	64.8	53.7	54.7
Upper	0	0.0	29.9	0	0.0	34.7	21.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	88	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	1.3
Moderate	0	0.0	10.1	0	0.0	9.7	22.9
Middle	0	0.0	58.2	0	0.0	52.9	54.7
Upper	0	0.0	31.6	0	0.0	37.4	21.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2019 HMDA Reportable Loans By Borrower Income Level Assessment Area: Nonmetropolitan Kentucky							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	­%	­%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	2	4.4	2.9	39	1.1	1.4	25.7
Moderate	7	15.6	14.9	458	12.6	9.8	16.2
Middle	8	17.8	24.3	413	11.3	20.9	17.3
Upper	23	51.1	42.0	2,240	61.4	51.8	40.9
Unknown	5	11.1	15.9	496	13.6	16.1	0.0
Total	45	100.0	100.0	3,646	100.0	100.0	100.0
Refinance Loans							
Low	2	6.9	3.7	47	1.7	2.0	25.7
Moderate	5	17.2	10.3	333	11.8	5.9	16.2
Middle	11	37.9	19.0	520	18.4	14.6	17.3
Upper	8	27.6	49.4	1,611	56.9	56.2	40.9
Unknown	3	10.3	17.6	322	11.4	21.4	0.0
Total	29	100.0	100.0	2,833	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	6.3	0	0.0	4.5	25.7
Moderate	1	10.0	13.4	26	5.9	10.3	16.2
Middle	3	30.0	18.2	192	43.5	16.0	17.3
Upper	6	60.0	59.3	223	50.6	64.5	40.9
Unknown	0	0.0	2.9	0	0.0	4.8	0.0
Total	10	100.0	100.0	441	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	4	4.6	3.3	86	1.2	1.7	25.7
Moderate	13	14.9	13.2	817	11.7	8.4	16.2
Middle	23	26.4	21.8	1,142	16.3	18.4	17.3
Upper	39	44.8	45.5	4,145	59.1	53.3	40.9
Unknown	8	9.2	16.2	818	11.7	18.2	0.0
Total	87	100.0	100.0	7,008	100.0	100.0	100.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

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Distribution of 2019 HMDA Reportable Loans By Borrower Income Level							
Assessment Area: Nonmetropolitan Kentucky							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	2.3	0	0.0	1.1	25.7
Moderate	0	0.0	11.3	0	0.0	8.3	16.2
Middle	0	0.0	17.5	0	0.0	16.3	17.3
Upper	0	0.0	67.5	0	0.0	73.8	40.9
Unknown	0	0.0	1.3	0	0.0	0.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	7.8	0	0.0	5.2	25.7
Moderate	0	0.0	17.5	0	0.0	16.1	16.2
Middle	1	33.3	19.5	17	19.3	16.5	17.3
Upper	2	66.7	50.6	71	80.7	53.8	40.9
Unknown	0	0.0	4.5	0	0.0	8.4	0.0
Total	3	100.0	100.0	88	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	25.7
Moderate	0	0.0	1.9	0	0.0	1.2	16.2
Middle	0	0.0	2.5	0	0.0	3.2	17.3
Upper	0	0.0	0.6	0	0.0	1.1	40.9
Unknown	0	0.0	94.9	0	0.0	94.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

## Small Farm Lending Tables

Distribution of 2022 Small Farm Lending By Income Level of Geography Assessment Area: Nonmetropolitan Kentucky					
Geographic Income Level	Bank Loans*				Total Farms %
	#	#%	\$(000)	\$%	
Low	3	1.5	0.9	170	1.1
Moderate	15	7.7	7.7	708	16.7
Middle	97	49.7	61.3	6,955	52.3
Upper	80	41.0	30.0	5,861	29.9
Unknown	0	0.0	0.0	0	0.0
<b>Total</b>	<b>195</b>	<b>100.0</b>	<b>100.0</b>	<b>13,694</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2020 U.S. Census Bureau Decennial Census Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Farm Lending By Revenue Size of Farms Assessment Area: Nonmetropolitan Kentucky					
	Bank Loans*				Total Farms %
	#	%	\$(000)	%	
By Revenue					
\$1 Million or Less	176	90.3	11,680	85.3	99.0
Over \$1 Million	4	2.1	1,327	9.7	0.6
Revenue Unknown	15	7.7	687	5.0	0.4
Total	195	100.0	13,694	100.0	100.0
By Loan Size					
\$100,000 or Less	151	77.4	4,670	34.1	
\$100,001 - \$250,000	34	17.4	5,730	41.8	
\$250,001 - \$500,000	10	5.1	3,294	24.1	
Total	195	100.0	13,694	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	137	77.8	4,123	35.3	
\$100,001 - \$250,000	33	18.8	5,590	47.9	
\$250,001 - \$500,000	6	3.4	1,967	16.8	
Total	176	100.0	11,680	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2020 U.S. Census Bureau Decennial Census Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

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Distribution of 2021 Small Farm Lending By Income Level of Geography Assessment Area: Nonmetropolitan Kentucky							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	8	1.4	0.9	28	0.2	0.1	0.4
Moderate	37	6.5	9.8	904	5.3	8.7	16.7
Middle	343	60.4	60.4	8,878	52.2	55.8	53.3
Upper	180	31.7	28.8	7,212	42.4	35.4	29.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	568	100.0	100.0	17,022	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Small Farm Lending By Revenue Size of Farms Assessment Area: Nonmetropolitan Kentucky							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	180	31.7	38.7	13,081	76.8	70.7	99.0
Over \$1 Million	2	0.4		696	4.1		0.6
Revenue Unknown	386	68.0		3,245	19.1		0.4
Total	568	100.0		17,022	100.0		100.0
By Loan Size							
\$100,000 or Less	524	92.3	91.9	7,394	43.4	45.7	
\$100,001 - \$250,000	27	4.8	5.5	4,333	25.5	28.0	
\$250,001 - \$500,000	17	3.0	2.6	5,295	31.1	26.3	
Total	568	100.0	100.0	17,022	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	139	77.2		4,289	32.8		
\$100,001 - \$250,000	26	14.4		4,193	32.1		
\$250,001 - \$500,000	15	8.3		4,599	35.2		
Total	180	100.0	13,081	100.0			
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2020 Small Farm Lending By Income Level of Geography Assessment Area: Nonmetropolitan Kentucky							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	1	0.9	0.4	70	1.1	0.5	0.4
Moderate	8	6.9	10.2	179	2.9	5.8	16.2
Middle	78	67.2	62.3	3,505	57.2	62.6	53.9
Upper	29	25.0	26.5	2,377	38.8	30.9	29.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	116	100.0	100.0	6,131	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Nonmetropolitan Kentucky							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	99	85.3	53.1	5,771	94.1	72.7	98.4
Over \$1 Million	0	0.0		0	0.0		1.0
Revenue Unknown	17	14.7		360	5.9		0.5
Total	116	100.0		6,131	100.0		100.0
By Loan Size							
\$100,000 or Less	105	90.5	92.0	2,743	44.7	50.6	
\$100,001 - \$250,000	2	1.7	4.4	419	6.8	19.1	
\$250,001 - \$500,000	9	7.8	3.6	2,969	48.4	30.3	
Total	116	100.0	100.0	6,131	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	88	88.9		2,383	41.3		
\$100,001 - \$250,000	2	2.0		419	7.3		
\$250,001 - \$500,000	9	9.1		2,969	51.4		
Total	99	100.0		5,771	100.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2019 Small Farm Lending By Income Level of Geography							
Assessment Area: Nonmetropolitan Kentucky							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	2	4.3	0.5	69	4.4	0.4	0.4
Moderate	4	8.5	9.9	30	1.9	7.4	16.1
Middle	36	76.6	62.7	1,205	76.2	63.6	57.3
Upper	5	10.6	25.8	277	17.5	28.3	26.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	47	100.0	100.0	1,581	100.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2019 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2019 Small Farm Lending By Revenue Size of Farms							
Assessment Area: Nonmetropolitan Kentucky							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	44	93.6	64.3	1,539	97.3	80.9	98.6
Over \$1 Million	1	2.1		11	0.7		0.9
Revenue Unknown	2	4.3		31	2.0		0.5
Total	47	100.0		1,581	100.0		100.0
By Loan Size							
\$100,000 or Less	44	93.6	88.8	871	55.1	44.6	
\$100,001 - \$250,000	2	4.3	8.1	307	19.4	30.4	
\$250,001 - \$500,000	1	2.1	3.1	403	25.5	25.0	
Total	47	100.0	100.0	1,581	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	41	93.2		829	53.9		
\$100,001 - \$250,000	2	4.5		307	19.9		
\$250,001 - \$500,000	1	2.3		403	26.2		
Total	44	100.0		1,539	100.0		
Source: 2019 FFIEC Census Data							
2019 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

## APPENDIX E

## LIMITED SCOPE – DEMOGRAPHIC INFORMATION

2022 LEXINGTON-FAYETTE, KY MSA #30460 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	9	6.5	5,607	4.4	1,775	31.7	27,914	22.1
Moderate	35	25.4	26,875	21.3	4,544	16.9	21,486	17.0
Middle	53	38.4	52,428	41.5	4,233	8.1	25,597	20.3
Upper	38	27.5	40,695	32.2	1,153	2.8	51,305	40.6
Unknown	3	2.2	697	0.6	278	39.9	0	0.0
Total AA	138	100.0	126,302	100.0	11,983	9.5	126,302	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	13,224	3,427	2.8	25.9	7,889	59.7	1,908	14.4
Moderate	54,363	23,160	19.0	42.6	26,277	48.3	4,926	9.1
Middle	87,710	51,149	42.0	58.3	29,857	34.0	6,704	7.6
Upper	63,076	43,740	35.9	69.3	15,049	23.9	4,287	6.8
Unknown	3,818	410	0.3	10.7	3,007	78.8	401	10.5
Total AA	222,191	121,886	100.0	54.9	82,079	36.9	18,226	8.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	910	3.9	840	4.0	65	3.8	5	2.1
Moderate	4,568	19.8	4,121	19.5	413	24.3	34	14.5
Middle	8,636	37.4	7,884	37.2	671	39.4	81	34.6
Upper	7,849	34.0	7,327	34.6	427	25.1	95	40.6
Unknown	1,155	5.0	1,009	4.8	127	7.5	19	8.1
Total AA	23,118	100.0	21,181	100.0	1,703	100.0	234	100.0
Percentage of Total Businesses:				91.6		7.4		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	6	0.7	6	0.7	0	0.0	0	0.0
Moderate	92	11.0	91	11.3	1	3.0	0	0.0
Middle	419	50.1	394	49.1	24	72.7	1	100.0
Upper	309	36.9	301	37.5	8	24.2	0	0.0
Unknown	11	1.3	11	1.4	0	0.0	0	0.0
Total AA	837	100.0	803	100.0	33	100.0	1	100.0
Percentage of Total Farms:				95.9		3.9		0.1
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								



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2021 LEXINGTON-FAYETTE, KY MSA #30460 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	11	8.5	7,713	6.3	2,897	37.6	28,548	23.5
Moderate	30	23.3	27,937	23.0	5,613	20.1	19,788	16.3
Middle	53	41.1	49,242	40.5	4,408	9.0	23,344	19.2
Upper	35	27.1	36,766	30.2	1,434	3.9	49,978	41.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	129	100.0	121,658	100.0	14,352	11.8	121,658	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	17,619	5,008	4.4	28.4	10,365	58.8	2,246	12.7
Moderate	55,418	22,137	19.5	39.9	27,852	50.3	5,429	9.8
Middle	85,461	47,772	42.0	55.9	30,005	35.1	7,684	9.0
Upper	54,933	38,694	34.1	70.4	12,494	22.7	3,745	6.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	213,431	113,611	100.0	53.2	80,716	37.8	19,104	9.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,331	5.7	1,180	5.5	138	7.9	13	6.4
Moderate	4,774	20.4	4,356	20.3	394	22.5	24	11.8
Middle	10,159	43.4	9,263	43.2	811	46.4	85	41.9
Upper	7,151	30.5	6,665	31.1	405	23.2	81	39.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	23,415	100.0	21,464	100.0	1,748	100.0	203	100.0
Percentage of Total Businesses:			91.7		7.5		0.9	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	15	1.8	15	1.8	0	0.0	0	0.0
Moderate	83	9.8	82	10.1	1	2.9	0	0.0
Middle	414	48.6	395	48.5	18	51.4	1	100.0
Upper	339	39.8	323	39.6	16	45.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	851	100.0	815	100.0	35	100.0	1	100.0
Percentage of Total Farms:			95.8		4.1		0.1	
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

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2020 LEXINGTON-FAYETTE, KY MSA #30460 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	11	8.5	7,713	6.3	2,897	37.6	28,548	23.5
Moderate	30	23.3	27,937	23.0	5,613	20.1	19,788	16.3
Middle	53	41.1	49,242	40.5	4,408	9.0	23,344	19.2
Upper	35	27.1	36,766	30.2	1,434	3.9	49,978	41.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	129	100.0	121,658	100.0	14,352	11.8	121,658	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	17,619	5,008	4.4	28.4	10,365	58.8	2,246	12.7
Moderate	55,418	22,137	19.5	39.9	27,852	50.3	5,429	9.8
Middle	85,461	47,772	42.0	55.9	30,005	35.1	7,684	9.0
Upper	54,933	38,694	34.1	70.4	12,494	22.7	3,745	6.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	213,431	113,611	100.0	53.2	80,716	37.8	19,104	9.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,368	5.8	1,204	5.6	151	8.2	13	6.4
Moderate	4,872	20.5	4,446	20.5	404	21.9	22	10.8
Middle	10,327	43.5	9,380	43.3	863	46.7	84	41.2
Upper	7,165	30.2	6,650	30.7	430	23.3	85	41.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	23,732	100.0	21,680	100.0	1,848	100.0	204	100.0
Percentage of Total Businesses:			91.4		7.8		0.9	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	15	1.7	15	1.8	0	0.0	0	0.0
Moderate	84	9.6	83	9.9	1	2.5	0	0.0
Middle	435	49.5	413	49.3	21	52.5	1	100.0
Upper	345	39.2	327	39.0	18	45.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	879	100.0	838	100.0	40	100.0	1	100.0
Percentage of Total Farms:			95.3		4.6		0.1	
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

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2019 LEXINGTON-FAYETTE, KY MSA #30460 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	11	8.5	7,713	6.3	2,897	37.6	28,548	23.5
Moderate	30	23.3	27,937	23.0	5,613	20.1	19,788	16.3
Middle	53	41.1	49,242	40.5	4,408	9.0	23,344	19.2
Upper	35	27.1	36,766	30.2	1,434	3.9	49,978	41.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	129	100.0	121,658	100.0	14,352	11.8	121,658	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	17,619	5,008	4.4	28.4	10,365	58.8	2,246	12.7
Moderate	55,418	22,137	19.5	39.9	27,852	50.3	5,429	9.8
Middle	85,461	47,772	42.0	55.9	30,005	35.1	7,684	9.0
Upper	54,933	38,694	34.1	70.4	12,494	22.7	3,745	6.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	213,431	113,611	100.0	53.2	80,716	37.8	19,104	9.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,344	5.7	1,179	5.5	154	8.3	11	5.7
Moderate	4,806	20.5	4,373	20.4	410	22.0	23	11.9
Middle	10,181	43.4	9,236	43.1	864	46.4	81	41.8
Upper	7,132	30.4	6,618	30.9	435	23.3	79	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	23,463	100.0	21,406	100.0	1,863	100.0	194	100.0
Percentage of Total Businesses:			91.2		7.9		0.8	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	16	1.8	16	1.8	0	0.0	0	0.0
Moderate	85	9.4	84	9.7	1	2.6	0	0.0
Middle	451	49.7	431	49.7	19	48.7	1	100.0
Upper	356	39.2	337	38.8	19	48.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	908	100.0	868	100.0	39	100.0	1	100.0
Percentage of Total Farms:			95.6		4.3		0.1	
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

## APPENDIX F

## LIMITED-SCOPE LENDING TABLES

## Small Business Lending Tables

Distribution of 2022 Small Business Lending By Income Level of Geography Assessment Area: Lexington-Fayette, KY MSA #30460					
Geographic Income Level	Bank Loans*				Total Businesses %
	#	#%	\$(000)	%	
Low	5	5.2	374	2.5	3.9
Moderate	21	21.9	3,939	26.4	19.8
Middle	39	40.6	6,173	41.4	37.4
Upper	27	28.1	4,164	27.9	34.0
Unknown	4	4.2	269	1.8	5.0
<b>Total</b>	<b>96</b>	<b>100.0</b>	<b>14,919</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2020 U.S. Census Bureau Decennial Census Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2022 Small Business Lending By Revenue Size of Businesses Assessment Area: Lexington-Fayette, KY MSA #30460					
	Bank Loans*				Total Businesses %
	#	#%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	52	54.2	8,049	54.0	91.6
Over \$1 Million	29	30.2	5,544	37.2	7.4
Revenue Unknown	15	15.6	1,326	8.9	1.0
Total	96	100.0	14,919	100.0	100.0
By Loan Size					
\$100,000 or Less	62	64.6	2,270	15.2	
\$100,001 - \$250,000	17	17.7	3,201	21.5	
\$250,001 - \$1 Million	17	17.7	9,448	63.3	
Total	96	100.0	14,919	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	34	65.4	1,130	14.0	
\$100,001 - \$250,000	10	19.2	1,801	22.4	
\$250,001 - \$1 Million	8	15.4	5,118	63.6	
Total	52	100.0	8,049	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2020 U.S. Census Bureau Decennial Census Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

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Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: Lexington-Fayette, KY MSA #30460							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	9	3.6	5.3	772	4.5	7.8	5.7
Moderate	55	21.9	19.0	3,500	20.4	17.2	20.4
Middle	118	47.0	43.8	8,046	46.9	48.4	43.4
Upper	69	27.5	31.5	4,844	28.2	26.4	30.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	251	100.0	100.0	17,162	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2021 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Lexington-Fayette, KY MSA #30460							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	44	17.5	51.1	5,393	31.4	34.8	91.7
Over \$1 Million	14	5.6		3,694	21.5		7.5
Revenue Unknown	193	76.9		8,075	47.1		0.9
Total	251	100.0		17,162	100.0		100.0
By Loan Size							
\$100,000 or Less	209	83.3	89.1	4,996	29.1	29.4	
\$100,001 - \$250,000	28	11.2	5.8	4,237	24.7	18.5	
\$250,001 - \$1 Million	14	5.6	5.1	7,929	46.2	52.1	
Total	251	100.0	100.0	17,162	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	31	70.5		1,133	21.0		
\$100,001 - \$250,000	8	18.2		1,291	23.9		
\$250,001 - \$1 Million	5	11.4		2,969	55.1		
Total	44	100.0		5,393	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2020 Small Business Lending By Income Level of Geography							
Assessment Area: Lexington-Fayette, KY MSA #30460							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
Low	13	4.7	5.9	1,516	6.6	7.6	5.8
Moderate	66	23.9	18.6	6,506	28.1	17.1	20.5
Middle	134	48.6	43.5	11,295	48.8	48.0	43.5
Upper	63	22.8	31.9	3,822	16.5	27.3	30.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	276	100.0	100.0	23,139	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2020 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Lexington-Fayette, KY MSA #30460							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	59	21.4	40.2	6,934	30.0	26.0	91.4
Over \$1 Million	20	7.2		5,707	24.7		7.8
Revenue Unknown	197	71.4		10,498	45.4		0.9
Total	276	100.0		23,139	100.0		100.0
By Loan Size							
\$100,000 or Less	222	80.4	84.1	6,231	26.9	27.8	
\$100,001 - \$250,000	28	10.1	9.1	4,597	19.9	21.9	
\$250,001 - \$1 Million	26	9.4	6.8	12,311	53.2	50.3	
Total	276	100.0	100.0	23,139	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	43	72.9		1,443	20.8		
\$100,001 - \$250,000	7	11.9		1,304	18.8		
\$250,001 - \$1 Million	9	15.3		4,187	60.4		
Total	59	100.0		6,934	100.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: Lexington-Fayette, KY MSA #30460							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	2	4.3	5.6	827	16.1	6.5	5.7
Moderate	7	15.2	19.9	1,023	19.9	17.3	20.5
Middle	28	60.9	41.8	2,984	58.0	47.4	43.4
Upper	9	19.6	31.5	312	6.1	28.5	30.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	46	100.0	100.0	5,146	100.0	100.0	100.0
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Lexington-Fayette, KY MSA #30460							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	34	73.9	46.4	2,838	55.1	37.9	91.2
Over \$1 Million	6	13.0		1,329	25.8		7.9
Revenue Unknown	6	13.0		979	19.0		0.8
Total	46	100.0		5,146	100.0		100.0
By Loan Size							
\$100,000 or Less	35	76.1	91.0	1,018	19.8	31.3	
\$100,001 - \$250,000	6	13.0	4.7	1,158	22.5	18.4	
\$250,001 - \$1 Million	5	10.9	4.3	2,970	57.7	50.2	
Total	46	100.0	100.0	5,146	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	28	82.4		700	24.7		
\$100,001 - \$250,000	3	8.8		558	19.7		
\$250,001 - \$1 Million	3	8.8		1,580	55.7		
Total	34	100.0		2,838	100.0		
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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## HMDA Lending Tables

Distribution of 2022 HMDA Reportable Loans By Income Level of Geography Assessment Area: Lexington-Fayette, KY MSA #30460							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	3.3	0	0.0	2.5	2.8
Moderate	5	17.9	18.5	1,009	11.0	13.0	19.0
Middle	8	28.6	45.6	1,708	18.6	42.7	42.0
Upper	15	53.6	32.0	6,480	70.5	41.3	35.9
Unknown	0	0.0	0.6	0	0.0	0.6	0.3
Total	28	100.0	100.0	9,197	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.9	0	0.0	2.2	2.8
Moderate	8	20.0	17.8	572	7.4	12.4	19.0
Middle	19	47.5	41.2	3,276	42.5	37.1	42.0
Upper	13	32.5	37.6	3,858	50.1	47.8	35.9
Unknown	0	0.0	0.5	0	0.0	0.6	0.3
Total	40	100.0	100.0	7,706	100.0	100.0	100.0
Home Improvement Loans							
Low	1	5.9	3.2	175	12.5	2.2	2.8
Moderate	3	17.6	14.1	235	16.7	9.6	19.0
Middle	6	35.3	38.7	392	27.9	35.1	42.0
Upper	7	41.2	43.6	601	42.8	52.4	35.9
Unknown	0	0.0	0.4	0	0.0	0.7	0.3
Total	17	100.0	100.0	1,403	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	1	16.7	11.0	76	1.4	3.1	10.6
Moderate	1	16.7	35.0	1,200	22.9	48.4	31.0
Middle	2	33.3	31.3	3,140	59.9	26.8	32.8
Upper	1	16.7	19.0	500	9.5	18.8	19.2
Unknown	1	16.7	3.7	330	6.3	2.8	6.5
Total	6	100.0	100.0	5,246	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	2	1.8	3.2	251	1.0	2.5	2.8
Moderate	19	16.7	17.4	3,046	11.9	18.0	19.0
Middle	46	40.4	43.0	9,556	37.3	38.4	42.0
Upper	46	40.4	35.9	12,437	48.5	40.2	35.9
Unknown	1	0.9	0.5	330	1.3	0.9	0.3
Total	114	100.0	100.0	25,620	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



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Distribution of 2022 HMDA Reportable Loans By Income Level of Geography							
Assessment Area: Lexington-Fayette, KY MSA #30460							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	1.5	0	0.0	1.1	2.8
Moderate	0	0.0	10.5	0	0.0	6.2	19.0
Middle	0	0.0	40.2	0	0.0	33.7	42.0
Upper	0	0.0	47.7	0	0.0	58.7	35.9
Unknown	0	0.0	0.2	0	0.0	0.2	0.3
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	4.5	0	0.0	2.4	2.8
Moderate	2	8.7	14.6	30	1.5	9.8	19.0
Middle	11	47.8	39.5	1,040	50.3	38.9	42.0
Upper	10	43.5	40.8	998	48.3	48.3	35.9
Unknown	0	0.0	0.6	0	0.0	0.6	0.3
Total	23	100.0	100.0	2,068	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	2.8	0	0.0	2.5	2.8
Moderate	0	0.0	26.4	0	0.0	23.1	19.0
Middle	0	0.0	48.6	0	0.0	46.0	42.0
Upper	0	0.0	22.2	0	0.0	28.5	35.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.3
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2022 HMDA Reportable Loans By Borrower Income Level Assessment Area: Lexington-Fayette, KY MSA #30460							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	­%	­%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	1	3.6	7.1	40	0.4	3.7	22.1
Moderate	2	7.1	19.9	579	6.3	14.4	17.0
Middle	4	14.3	21.1	766	8.3	18.6	20.3
Upper	17	60.7	34.0	7,020	76.3	45.4	40.6
Unknown	4	14.3	17.8	792	8.6	18.0	0.0
Total	28	100.0	100.0	9,197	100.0	100.0	100.0
Refinance Loans							
Low	10	25.0	12.4	597	7.7	6.7	22.1
Moderate	5	12.5	20.9	328	4.3	15.2	17.0
Middle	6	15.0	21.5	971	12.6	19.9	20.3
Upper	12	30.0	32.4	4,384	56.9	43.9	40.6
Unknown	7	17.5	12.9	1,426	18.5	14.3	0.0
Total	40	100.0	100.0	7,706	100.0	100.0	100.0
Home Improvement Loans							
Low	2	11.8	8.7	39	2.8	4.3	22.1
Moderate	2	11.8	15.8	111	7.9	9.3	17.0
Middle	1	5.9	23.0	23	1.6	17.1	20.3
Upper	11	64.7	49.0	1,159	82.6	64.2	40.6
Unknown	1	5.9	3.5	71	5.1	5.2	0.0
Total	17	100.0	100.0	1,403	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	17	15.7	9.0	815	4.0	4.6	22.1
Moderate	15	13.9	19.6	1,681	8.3	14.2	17.0
Middle	15	13.9	21.6	1,982	9.7	18.8	20.3
Upper	48	44.4	35.9	13,559	66.6	46.3	40.6
Unknown	13	12.0	13.9	2,337	11.5	16.0	0.0
Total	108	100.0	100.0	20,374	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

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Distribution of 2022 HMDA Reportable Loans By Borrower Income Level							
Assessment Area: Lexington-Fayette, KY MSA #30460							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	8.1	0	0.0	4.4	22.1
Moderate	0	0.0	19.7	0	0.0	13.3	17.0
Middle	0	0.0	24.3	0	0.0	18.1	20.3
Upper	0	0.0	45.4	0	0.0	62.3	40.6
Unknown	0	0.0	2.4	0	0.0	1.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	4	17.4	13.4	139	6.7	10.9	22.1
Moderate	6	26.1	15.9	663	32.1	11.5	17.0
Middle	4	17.4	23.6	222	10.7	19.5	20.3
Upper	8	34.8	41.4	996	48.2	47.7	40.6
Unknown	1	4.3	5.7	48	2.3	10.5	0.0
Total	23	100.0	100.0	2,068	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	2.8	0	0.0	2.0	22.1
Moderate	0	0.0	1.4	0	0.0	2.0	17.0
Middle	0	0.0	0.0	0	0.0	0.0	20.3
Upper	0	0.0	0.0	0	0.0	0.0	40.6
Unknown	0	0.0	95.8	0	0.0	96.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2021 HMDA Reportable Loans By Income Level of Geography Assessment Area: Lexington-Fayette, KY MSA #30460							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	3.7	0	0.0	2.5	4.4
Moderate	5	38.5	21.2	522	27.0	16.1	19.5
Middle	7	53.8	40.5	1,351	69.8	37.6	42.0
Upper	1	7.7	34.7	62	3.2	43.7	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	13	100.0	100.0	1,935	100.0	100.0	100.0
Refinance Loans							
Low	2	12.5	2.7	65	3.2	1.8	4.4
Moderate	1	6.3	15.7	119	5.8	11.1	19.5
Middle	10	62.5	39.8	1,216	59.4	36.1	42.0
Upper	3	18.8	41.8	647	31.6	51.0	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	16	100.0	100.0	2,047	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	4.9	0	0.0	2.5	4.4
Moderate	0	0.0	12.4	0	0.0	9.7	19.5
Middle	0	0.0	36.5	0	0.0	34.1	42.0
Upper	0	0.0	46.3	0	0.0	53.7	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	14.3	0	0.0	11.5	15.7
Moderate	0	0.0	38.6	0	0.0	46.0	35.3
Middle	2	100.0	30.3	1,290	100.0	25.3	34.7
Upper	0	0.0	16.7	0	0.0	17.2	14.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	1,290	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	2	6.5	3.2	65	1.2	3.1	4.4
Moderate	6	19.4	17.8	641	12.2	16.8	19.5
Middle	19	61.3	39.8	3,857	73.2	35.6	42.0
Upper	4	12.9	39.1	709	13.4	44.5	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	31	100.0	100.0	5,272	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2021 HMDA Reportable Loans By Income Level of Geography							
Assessment Area: Lexington-Fayette, KY MSA #30460							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%%	%%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	1.3	0	0.0	0.6	4.4
Moderate	0	0.0	12.1	0	0.0	7.9	19.5
Middle	0	0.0	38.3	0	0.0	35.7	42.0
Upper	0	0.0	48.3	0	0.0	55.8	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	2.3	0	0.0	1.6	4.4
Moderate	0	0.0	17.4	0	0.0	9.0	19.5
Middle	0	0.0	39.1	0	0.0	39.6	42.0
Upper	0	0.0	41.1	0	0.0	49.8	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	3.3	0	0.0	2.1	4.4
Moderate	0	0.0	27.8	0	0.0	21.5	19.5
Middle	0	0.0	44.4	0	0.0	45.9	42.0
Upper	0	0.0	24.5	0	0.0	30.5	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2021 HMDA Reportable Loans By Borrower Income Level Assessment Area: Lexington-Fayette, KY MSA #30460							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	2	15.4	7.4	257	13.3	4.3	23.5
Moderate	2	15.4	20.9	300	15.5	15.8	16.3
Middle	2	15.4	20.4	282	14.6	18.7	19.2
Upper	4	30.8	33.1	582	30.1	43.5	41.1
Unknown	3	23.1	18.3	514	26.6	17.7	0.0
Total	13	100.0	100.0	1,935	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	6.9	0	0.0	3.8	23.5
Moderate	2	12.5	17.4	110	5.4	12.2	16.3
Middle	6	37.5	20.5	891	43.5	17.6	19.2
Upper	7	43.8	38.7	906	44.3	49.6	41.1
Unknown	1	6.3	16.5	140	6.8	16.9	0.0
Total	16	100.0	100.0	2,047	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	6.2	0	0.0	3.3	23.5
Moderate	0	0.0	15.6	0	0.0	9.5	16.3
Middle	0	0.0	20.3	0	0.0	14.7	19.2
Upper	0	0.0	54.4	0	0.0	66.2	41.1
Unknown	0	0.0	3.5	0	0.0	6.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total HMDA Reportable Loans							
Low	2	6.9	7.0	257	6.5	4.0	23.5
Moderate	4	13.8	18.6	410	10.3	13.7	16.3
Middle	8	27.6	20.4	1,173	29.5	17.9	19.2
Upper	11	37.9	37.5	1,488	37.4	47.3	41.1
Unknown	4	13.8	16.6	654	16.4	17.1	0.0
Total	29	100.0	100.0	3,982	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

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Distribution of 2021 HMDA Reportable Loans By Borrower Income Level							
Assessment Area: Lexington-Fayette, KY MSA #30460							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	6.6	0	0.0	3.1	23.5
Moderate	0	0.0	15.6	0	0.0	8.9	16.3
Middle	0	0.0	21.0	0	0.0	14.4	19.2
Upper	0	0.0	53.7	0	0.0	71.3	41.1
Unknown	0	0.0	3.1	0	0.0	2.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	6.2	0	0.0	3.3	23.5
Moderate	0	0.0	20.2	0	0.0	14.1	16.3
Middle	0	0.0	21.7	0	0.0	13.6	19.2
Upper	0	0.0	42.2	0	0.0	57.4	41.1
Unknown	0	0.0	9.7	0	0.0	11.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	23.5
Moderate	0	0.0	0.7	0	0.0	0.4	16.3
Middle	0	0.0	0.0	0	0.0	0.0	19.2
Upper	0	0.0	0.0	0	0.0	0.0	41.1
Unknown	0	0.0	99.3	0	0.0	99.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2020 HMDA Reportable Loans By Income Level of Geography Assessment Area: Lexington-Fayette, KY MSA #30460							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	1	3.3	3.3	314	6.2	2.1	4.4
Moderate	11	36.7	20.1	1,573	30.8	14.8	19.5
Middle	10	33.3	40.3	1,410	27.6	37.7	42.0
Upper	8	26.7	36.3	1,803	35.4	45.4	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	30	100.0	100.0	5,100	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.0	0	0.0	1.3	4.4
Moderate	1	7.1	12.7	93	6.3	9.0	19.5
Middle	11	78.6	39.0	1,284	86.3	35.2	42.0
Upper	2	14.3	46.2	110	7.4	54.4	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	14	100.0	100.0	1,487	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.7	0	0.0	1.5	4.4
Moderate	0	0.0	13.3	0	0.0	10.5	19.5
Middle	2	66.7	36.4	147	46.4	32.2	42.0
Upper	1	33.3	48.6	170	53.6	55.7	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	317	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	16.9	0	0.0	13.7	15.7
Moderate	0	0.0	36.2	0	0.0	13.1	35.3
Middle	1	33.3	30.4	726	36.3	32.0	34.7
Upper	2	66.7	16.4	1,273	63.7	41.1	14.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	1,999	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	2	3.7	2.7	325	3.6	2.4	4.4
Moderate	12	22.2	15.9	1,666	18.2	11.6	19.5
Middle	25	46.3	39.4	3,604	39.4	36.0	42.0
Upper	15	27.8	42.1	3,542	38.8	50.0	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	54	100.0	100.0	9,137	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							



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Distribution of 2020 HMDA Reportable Loans By Income Level of Geography							
Assessment Area: Lexington-Fayette, KY MSA #30460							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	2.2	0	0.0	1.5	4.4
Moderate	0	0.0	12.3	0	0.0	7.7	19.5
Middle	0	0.0	36.9	0	0.0	33.0	42.0
Upper	0	0.0	48.7	0	0.0	57.8	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	25.0	4.7	11	4.7	4.5	4.4
Moderate	0	0.0	16.5	0	0.0	12.1	19.5
Middle	1	25.0	38.8	37	15.8	40.4	42.0
Upper	2	50.0	40.0	186	79.5	43.1	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	234	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	3.8	0	0.0	2.9	4.4
Moderate	0	0.0	21.0	0	0.0	15.6	19.5
Middle	0	0.0	46.3	0	0.0	42.0	42.0
Upper	0	0.0	28.8	0	0.0	39.5	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2020 HMDA Reportable Loans By Borrower Income Level Assessment Area: Lexington-Fayette, KY MSA #30460							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	2	6.7	9.9	285	5.6	6.0	23.5
Moderate	3	10.0	25.0	335	6.6	19.6	16.3
Middle	2	6.7	22.1	136	2.7	21.3	19.2
Upper	11	36.7	31.1	2,364	46.4	42.1	41.1
Unknown	12	40.0	11.8	1,980	38.8	10.9	0.0
Total	30	100.0	100.0	5,100	100.0	100.0	100.0
Refinance Loans							
Low	2	14.3	5.6	65	4.4	2.9	23.5
Moderate	1	7.1	16.0	110	7.4	11.0	16.3
Middle	4	28.6	20.1	323	21.7	17.3	19.2
Upper	6	42.9	41.0	839	56.4	51.7	41.1
Unknown	1	7.1	17.3	150	10.1	17.1	0.0
Total	14	100.0	100.0	1,487	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	6.2	0	0.0	3.4	23.5
Moderate	0	0.0	13.6	0	0.0	8.3	16.3
Middle	0	0.0	22.8	0	0.0	16.9	19.2
Upper	1	33.3	53.0	11	3.5	64.6	41.1
Unknown	2	66.7	4.4	306	96.5	6.8	0.0
Total	3	100.0	100.0	317	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	6	11.8	7.2	398	5.6	4.1	23.5
Moderate	4	7.8	19.1	445	6.2	14.3	16.3
Middle	6	11.8	20.6	459	6.4	18.7	19.2
Upper	20	39.2	37.3	3,400	47.6	47.6	41.1
Unknown	15	29.4	15.8	2,436	34.1	15.2	0.0
Total	51	100.0	100.0	7,138	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

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Distribution of 2020 HMDA Reportable Loans By Borrower Income Level							
Assessment Area: Lexington-Fayette, KY MSA #30460							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	##%	##%	\$(000)	\$\$%	\$\$%	
Other Purpose LOC							
Low	0	0.0	5.6	0	0.0	2.2	23.5
Moderate	0	0.0	15.7	0	0.0	9.4	16.3
Middle	0	0.0	20.5	0	0.0	13.4	19.2
Upper	0	0.0	53.7	0	0.0	71.1	41.1
Unknown	0	0.0	4.5	0	0.0	3.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	2	50.0	8.8	48	20.5	4.1	23.5
Moderate	0	0.0	23.5	0	0.0	14.5	16.3
Middle	0	0.0	18.2	0	0.0	15.3	19.2
Upper	2	50.0	45.3	186	79.5	58.7	41.1
Unknown	0	0.0	4.1	0	0.0	7.3	0.0
Total	4	100.0	100.0	234	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.2	0	0.0	0.1	23.5
Moderate	0	0.0	0.8	0	0.0	0.8	16.3
Middle	0	0.0	0.6	0	0.0	0.8	19.2
Upper	0	0.0	0.2	0	0.0	0.3	41.1
Unknown	0	0.0	98.3	0	0.0	98.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2019 HMDA Reportable Loans By Income Level of Geography Assessment Area: Lexington-Fayette, KY MSA #30460							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	1	9.1	3.8	180	14.5	2.5	4.4
Moderate	0	0.0	18.2	0	0.0	12.8	19.5
Middle	7	63.6	41.9	618	49.7	38.7	42.0
Upper	3	27.3	36.1	446	35.9	46.0	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	11	100.0	100.0	1,244	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.9	0	0.0	1.8	4.4
Moderate	1	11.1	14.7	65	3.7	10.3	19.5
Middle	7	77.8	40.0	1,600	92.2	36.3	42.0
Upper	1	11.1	42.4	70	4.0	51.7	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	9	100.0	100.0	1,735	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.4	0	0.0	2.8	4.4
Moderate	0	0.0	14.3	0	0.0	10.3	19.5
Middle	0	0.0	38.7	0	0.0	37.2	42.0
Upper	1	100.0	43.6	30	100.0	49.7	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	30	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	15.9	0	0.0	7.4	15.7
Moderate	0	0.0	41.5	0	0.0	40.6	35.3
Middle	0	0.0	30.8	0	0.0	42.7	34.7
Upper	0	0.0	11.8	0	0.0	9.3	14.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	1	4.8	3.6	180	6.0	2.9	4.4
Moderate	1	4.8	16.9	65	2.2	15.3	19.5
Middle	14	66.7	40.8	2,218	73.7	38.4	42.0
Upper	5	23.8	38.7	546	18.1	43.5	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	21	100.0	100.0	3,009	100.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2019 HMDA Reportable Loans By Income Level of Geography							
Assessment Area: Lexington-Fayette, KY MSA #30460							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	1.9	0	0.0	1.5	4.4
Moderate	0	0.0	14.1	0	0.0	9.7	19.5
Middle	0	0.0	37.0	0	0.0	31.3	42.0
Upper	0	0.0	47.0	0	0.0	57.5	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	4.7	0	0.0	4.0	4.4
Moderate	0	0.0	14.8	0	0.0	8.7	19.5
Middle	0	0.0	39.4	0	0.0	32.6	42.0
Upper	0	0.0	41.1	0	0.0	54.7	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	4.8	0	0.0	3.0	4.4
Moderate	0	0.0	24.7	0	0.0	19.0	19.5
Middle	0	0.0	50.2	0	0.0	51.6	42.0
Upper	0	0.0	20.3	0	0.0	26.4	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2019 HMDA Reportable Loans By Borrower Income Level Assessment Area: Lexington-Fayette, KY MSA #30460							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	1	9.1	9.0	26	2.1	5.2	23.5
Moderate	0	0.0	21.7	0	0.0	16.3	16.3
Middle	4	36.4	21.7	321	25.8	19.8	19.2
Upper	2	18.2	34.7	466	37.5	46.6	41.1
Unknown	4	36.4	13.0	431	34.6	12.1	0.0
Total	11	100.0	100.0	1,244	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	8.3	0	0.0	4.2	23.5
Moderate	3	33.3	15.2	130	7.5	9.9	16.3
Middle	0	0.0	19.9	0	0.0	16.7	19.2
Upper	5	55.6	40.5	1,518	87.5	53.3	41.1
Unknown	1	11.1	16.0	87	5.0	15.9	0.0
Total	9	100.0	100.0	1,735	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	6.5	0	0.0	3.9	23.5
Moderate	0	0.0	18.6	0	0.0	12.8	16.3
Middle	0	0.0	21.9	0	0.0	17.6	19.2
Upper	1	100.0	49.8	30	100.0	62.1	41.1
Unknown	0	0.0	3.2	0	0.0	3.6	0.0
Total	1	100.0	100.0	30	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	1	4.8	8.5	26	0.9	4.7	23.5
Moderate	3	14.3	18.9	130	4.3	13.7	16.3
Middle	4	19.0	20.9	321	10.7	18.4	19.2
Upper	8	38.1	37.8	2,014	66.9	49.4	41.1
Unknown	5	23.8	13.9	518	17.2	13.7	0.0
Total	21	100.0	100.0	3,009	100.0	100.0	100.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

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Distribution of 2019 HMDA Reportable Loans By Borrower Income Level							
Assessment Area: Lexington-Fayette, KY MSA #30460							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	9.1	0	0.0	5.4	23.5
Moderate	0	0.0	17.1	0	0.0	11.1	16.3
Middle	0	0.0	23.3	0	0.0	21.2	19.2
Upper	0	0.0	48.1	0	0.0	60.7	41.1
Unknown	0	0.0	2.3	0	0.0	1.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	5.1	0	0.0	2.7	23.5
Moderate	0	0.0	20.8	0	0.0	16.6	16.3
Middle	0	0.0	24.2	0	0.0	13.6	19.2
Upper	0	0.0	44.1	0	0.0	61.7	41.1
Unknown	0	0.0	5.9	0	0.0	5.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.9	0	0.0	0.9	23.5
Moderate	0	0.0	3.5	0	0.0	3.9	16.3
Middle	0	0.0	0.4	0	0.0	1.1	19.2
Upper	0	0.0	3.1	0	0.0	4.6	41.1
Unknown	0	0.0	92.1	0	0.0	89.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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## Small Farm Lending Tables

Distribution of 2021 Small Farm Lending By Income Level of Geography Assessment Area: Lexington-Fayette, KY MSA #30460							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	1	1.6	1.3	15	0.6	1.4	1.8
Moderate	6	9.7	13.1	105	4.3	11.9	9.8
Middle	25	40.3	53.5	530	21.7	58.2	48.6
Upper	30	48.4	31.6	1,798	73.4	28.4	39.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	62	100.0	100.0	2,448	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Small Farm Lending By Revenue Size of Farms Assessment Area: Lexington-Fayette, KY MSA #30460							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	26	41.9	62.1	1,549	63.3	71.8	95.8
Over \$1 Million	3	4.8		370	15.1		4.1
Revenue Unknown	33	53.2		529	21.6		0.1
Total	62	100.0		2,448	100.0		100.0
By Loan Size							
\$100,000 or Less	57	91.9	87.4	1,256	51.3	33.5	
\$100,001 - \$250,000	4	6.5	6.6	792	32.4	23.3	
\$250,001 - \$500,000	1	1.6	5.9	400	16.3	43.2	
Total	62	100.0	100.0	2,448	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	23	88.5		735	47.4		
\$100,001 - \$250,000	2	7.7		414	26.7		
\$250,001 - \$500,000	1	3.8		400	25.8		
Total	26	100.0		1,549	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							



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Distribution of 2020 Small Farm Lending By Income Level of Geography Assessment Area: Lexington-Fayette, KY MSA #30460							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	2.6	0	0.0	2.7	1.7
Moderate	3	6.3	10.0	97	3.1	11.9	9.6
Middle	13	27.1	51.3	409	13.1	53.6	49.5
Upper	32	66.7	35.5	2,626	83.8	31.7	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	48	100.0	100.0	3,132	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2020 Small Farm Lending By Revenue Size of Farms							
Assessment Area: Lexington-Fayette, KY MSA #30460							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	25	52.1	60.0	523	16.7	59.2	95.3
Over \$1 Million	7	14.6		1,260	40.2		4.6
Revenue Unknown	16	33.3		1,349	43.1		0.1
Total	48	100.0		3,132	100.0		100.0
By Loan Size							
\$100,000 or Less	41	85.4	80.3	1,183	37.8	28.2	
\$100,001 - \$250,000	4	8.3	11.3	739	23.6	26.9	
\$250,001 - \$500,000	3	6.3	8.4	1,210	38.6	45.0	
Total	48	100.0	100.0	3,132	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	25	100.0		523	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$500,000	0	0.0		0	0.0		
Total	25	100.0	523	100.0			
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

## APPENDIX G

## GLOSSARY OF TERMS

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

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

**Community development:** All Agencies have adopted the following language. Affordable housing (including multifamily rental housing) for LMI individuals; community services targeted to LMI 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 revenue of \$1.0 million or less; or, activities that revitalize or stabilize LMI geographies.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Small loan(s) to business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1.0 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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