Bank of Bartlett

CRA – Public File

10/30/2026

Bank of Bartlett

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Bank of Bartlett

Community Reinvestment Act Notice

The Bank of Bartlett continues to make every effort to contribute to the livelihood of the community it services, as evidenced in this Community Reinvestment Act Statement. The Bank of Bartlett welcomes and encourages the comments of community members and organizations concerning the Bank's efforts to participate in the spirit of the Community Reinvestment Act

CRA Notice

Under the Federal Community Reinvestment Act (CRA), the Federal Reserve Board (Board) evaluates our record of helping to meet the credit needs of this community consistently with safe and sound operations. The Board also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the Federal Reserve Bank of St. Louis; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the Federal Reserve System publishes a list of the banks that are scheduled for CRA examination by the Reserve Bank in that quarter. This list is available from Vice President of Bank Supervision and Regulation, Federal Reserve Bank of St. Louis, P.O. Box 442, St. Louis, MO 63166. You may send written comments about our performance in helping to meet community credit needs to Chief Compliance Officer, Bank of Bartlett, 6281 Stage Road, Bartlett, TN 38134 and Vice President of Bank Supervision and Regulation, Federal Reserve Bank of St. Louis, P.O. Box 442, St. Louis, MO 63166. Your letter, together with any response by us, will be considered by the Federal Reserve System in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Reserve Bank. You may also request from the Reserve Bank an announcement of our applications covered by the CRA filed with the Reserve Bank. We are an affiliate of West Tennessee Bancshares, a bank holding company. You may request from Vice President of Bank Supervision and Regulation, Federal Reserve Bank of St. Louis, P.O. Box 442, St. Louis, MO 63166 an announcement of applications covered by the CRA filed by bank holding companies.

Bank of Bartlett

HMDA Disclosure Statement

Home Mortgage Discloser Act Notice

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials.

HMDA data for Bank of Bartlett and Bartlett Mortgage, Inc, as well as many other financial institutions, is available online. For more information, visit the Consumer Financial Protection Bureau's Web site (www.consumerfinance.gov/hmda).

Public Comment

Bank of Bartlett received no written comments or complaints during the current or last two years (2024-2025), that specifically relate to the bank's performance in helping to meet community credit needs. There are no public comments.

CRA Federal Reserve Bank Performance Evaluation

Bank of Bartlett's most recent CRA Performance Evaluation completed on March 28, 2022, by the Federal Reserve, is attached as **Appendix A**. Bank of Bartlett received a Satisfactory.

Bank of Bartlett

Branch Locations & Delivery Systems

Bank of Bartlett offers the capability to perform banking functions through various channels. Some or all of these channels are widely available to all customers. Traditional avenues (personal visits to physical branch locations) are enhanced by Bank of Bartlett's generous hours of operation.

Telephone banking services are available to all customers. Our automated phone system, Fast Check, is available to all customers 24 hours a day, and offers a full array of services including the ability to retrieve balances, report lost or stolen Debit cards, and transfer funds, etc.

Personal online banking services are also offered to all Bank of Bartlett customers. The system allows customers to retrieve balances, transfer funds, print statements, e-mail the Bank, access account histories, view check images, and utilize bill payment services.

In addition, Bank of Bartlett maintains a website that provides on-line banking capabilities, bank information including product and service descriptions, employment opportunities, bank news, bank history, bank financial information, and "contact-us" capabilities via e-mail.

Branch Office Locations and Hours

Main Office
6281 Stage Road
Bartlett TN 38134
Census tract 206.22
Tract designation- Middle

Raleigh Branch
3691 Austin Peay Hwy
Memphis TN 38128
Census tract 205.32
Tract designation-Moderate

Kirby Woods Branch
1870 Kirby Pkwy
Germantown TN 38138
Census tract 214.30
Tract designation- Upper

Wolfchase Branch
7984 Highway 64
Bartlett, TN 38133
Census tract 206.32
Tract designation- Upper

Cordova Branch
678 N. Germantown Pkwy
Cordova TN 38018
Census tract 211.43
Tract designation-Upper

Collierville Branch
1020 W. Poplar Avenue
Collierville, TN 38017
Census tract 215.30
Tract designation- Upper

Houston Levee @ 64
9915 Highway 64 Ste 101
Memphis, TN 38002
Census tract 210.23
Tract designation- Upper

Bank of Bartlett

Hours of Operation

Lobby Hours	
Monday - Thursday	9 AM – 4:30 PM
Friday	9 AM - 6 PM
Saturday	Lobby- Closed
	Branch drive-up Live Video Banker ITMs available at all branch locations. Hours: 9 AM – 1 PM
Live Video Bankers	
BoB Video Bankers expanded hours: 8 am - 6 pm | Monday - Friday 9 am - 1 pm | Saturday For Saturday banking, BoB branch locations serve you through the Video Banker ITMs at all branch locations.	
Automated Teller Machines (ATMs)	
Automated Teller Machines (ATMs) are also available at all branch and Memphis area Allpoint locations.	
Customer Care Call Center Hours	
Mon - Thurs: 8:00AM - 5:00PM	
Friday: 8:00AM - 6:00PM	
Saturday: 9:00AM - 1:00PM	

History of the Bank of Bartlett

Bank of Bartlett was incorporated in the City of Bartlett by local investors and opened for business in 1980. Bank of Bartlett is proud of and attributes much of its success and growth to its ongoing community service and involvement in area churches, schools, charities, and non-profit organizations. The bank has grown rapidly to become one of the largest community banks in the Memphis market and top 30 banks in Tennessee. Bartlett Mortgage, a subsidiary opened in 1983, has consistently ranked in the top 15 mortgage companies in dollar volume of mortgages originated annually. Bartlett Travel opened in 1987 as a subsidiary of Bank of Bartlett and provides an array of leisure and business travel opportunities to its customers. Quality, friendly, and responsive customer service to make customers "feel at home" has been the key driving force for the Bank's growth and expansion to locations within the adjacent metropolitan area. To maintain and improve that service level, a growing distribution network for Bank of Bartlett customers has been developed including 7 strategically located branches in the Memphis area with free ATMs access through the Allpoint network. Allpoint participating ATMs are located nationwide (over 55,000 locations) and are prevalent in the Memphis MSA at area CVS, Allpoint, Kroger, Target and many more locations.

The City of Bartlett, founded in 1865, is a historic city. Once a mainly rural and quiet town, the City of Bartlett has grown to be the 9th largest city in the State of Tennessee with over 50,000 citizens in population. Bank of Bartlett branches are also located in the cities of Germantown, Collierville, and Memphis.

Bank of Bartlett

Bank of Bartlett offers full banking services, access of account information through FastCheck (our voice activated telephonic banking system), and transaction opportunities 24 hours daily through its extensive ATM network, the Internet, Smart Phone, and cell phone. Commercial and consumer banking, mortgage services, & travel services are all conveniently available.'

Record of Opening and Closing Offices

There have been no branches opened or closed by the Bank during the current year and each of the prior two calendar years.

Bank of Bartlett

Lending and Deposit Services

Construction Financing

a. Commercial construction loans
b. Single family residential
c. Multi-family residential
d. Residential construction to builders

Land Development Loans

Real Estate Loans

e. Home Equity Lines of Credit
f. Originations of residential 1st mortgage
g. 10-year fixed rate mortgages
h. Swing loans (bridge loans)
i. Commercial first mortgage loans
j. Home improvement loans

Commercial Loans

k. Lines of Credit
l. Letters of Credit
m. Commercial vehicle
n. Accounts receivables/inventory
o. Working capital loans
p. Seasonal

Government Guaranteed Loans

Bartlett Mortgage Loans

q. The Bank of Bartlett's subsidiary, Bartlett Mortgage Inc., offers a full range of mortgage loans including conventional, fixed-rate, Veterans Administration (VA), Federal Housing Administration (FHA) loans and THDA loans

Consumer Credit

r. Credit Builder secured
s. Personal - secured and unsecured
t. Automobiles - new and used
u. Recreational vehicles
v. Real estate - First and second mortgage
w. Home improvement loans
x. Home equity loans
y. Home Equity Lines of Credit
z. Adjustable-Rate Mortgages

Bank of Bartlett

aa. Reserve line of credit loans

Deposit Account Products and Services

Checking Accounts

bb. Advantage Checking

cc. Renew Checking

dd. Essential Checking

ee. Prime Set Checking

ff. Student Checking

gg. Work Place Checking

Savings and Money Market

hh. Savings Account

ii. Money Market Plus

jj. Money Market

kk. Individual Development Accounts

ll. Commercial checking, savings, and sweep accounts

The more affordable products include

Renew Checking Account -- $100 to open the account, $1500 average daily balance to waive service charge. $15 monthly service charge. No Fee ATM withdrawals at Allpoint ATMs

Student Checking Account -- $50.00 to open the account, no minimum balance required. No monthly service charge through age 25. Free Online Banking and Premium Bill Pay Service. No Fee ATM Withdrawals at Allpoint ATMs.

Work Place Checking -- $50.00 to open the account, no minimum balance required, No Fee ATM withdrawals at Allpoint ATMs

Savings Account -- $100 to open. There is no charge on accounts maintaining an average daily balance of $500. For accounts falling below this minimum, the service charge is only $5 per month. No Fee ATM withdrawals at Allpoint ATMs

Individual Retirement Accounts -- the Bank offers a variety of fixed-rate and variable-rate instruments, which are insured by the FDIC

Certificates of Deposit -- terms range from one month to sixty months. There are certificates available that start with a minimum deposit of $1000.

Add 2- CD's- Offers consumers a way to add money to a CD to encourage savings

Bank of Bartlett

Miscellaneous Products and Services

Credit Builder loan Program- BOB offers a loan product to assist consumers in building credit. The bank provides the cash collateral to be held in a certificate of deposit from which a CD secured loan is taken. The borrower is able to make payments to the CD secured loan and this data is reported to the credit bureaus. Typically, the loans have a maturity of 12 months.

ATM- ATM transactions at a Bank of Bartlett machine or ATMs access through the Allpoint network. Allpoint participating ATMs are located nationwide (over 55,000 locations) and are prevalent in the Memphis MSA at area CVS, Allpoint, Kroger, Target and many more locations.

Customer Care Line (Fastcheck) -- a 24-hour automated telephone system, allows our customers instant access to their checking, savings, and loan information using a touch-tone telephone.

Customer Care Call Center- The Bank of Bartlett has made improvement in providing prompt service to customers with the addition of a customer call center. Customers can call into one line where a friendly customer care employee will assist with all of their banking needs.

Debit Card -- Bank of Bartlett's MasterCard debit card eliminates check writing and doubles as the ATM card.

On-line Banking – Customers can transfer funds between Bank of Bartlett accounts, pay bills, check balances, stop payment on checks, etc.

Mobil Banking – Customers have the convenience to securely make payments, transfer money, and check balances with Bank of Bartlett Mobile Money.

Safe Deposit Box Services

Direct Deposit Services

Wire Transfer Services – including International remittances

Cashier's Checks

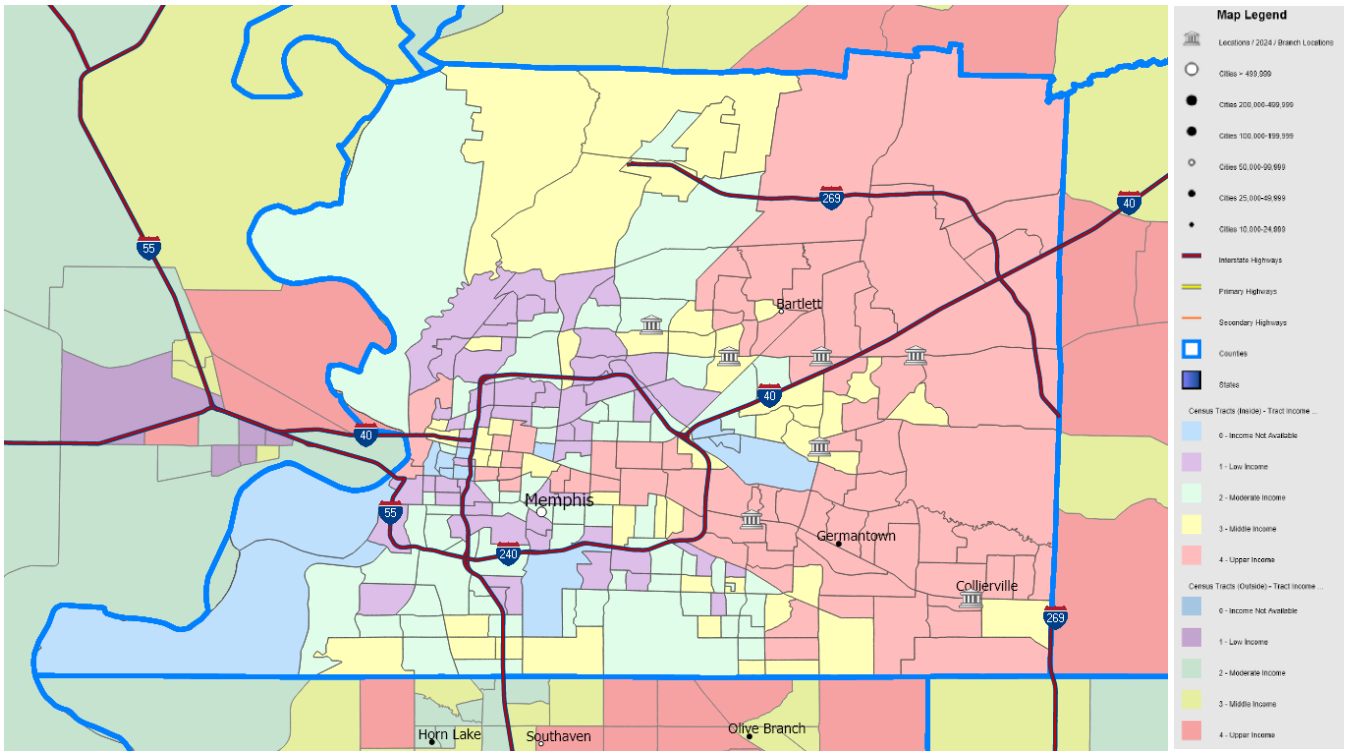
Night Depository Services

Notary Services

Bank of Bartlett

Description of CRA Assessment Area and Map

The Bank's assessment area includes all of Shelby County, Tennessee, which is comprised of 249 census tracts. There are 51 Low-income tracts, 67 moderate income tracts, 47 Middle income tracts, 72 upper income census tracts and 12 unknown tracts. *Shelby County is part of the Memphis TN-AR-MS MSA*:



Bank of Bartlett

2025 Tract List with Income Designations

Unknown	Low	Low	Moderate	Moderate	Middle	Upper	Upper
27	2	99.02	3	108.1	17	1	208.36
38	4	100.01	9	110.1	21	16	208.37
45	6	100.02	11	110.2	25	26	209.01
46	7	101.2	12	201.01	31	29	209.02
114.01	8	101.21	15	202.22	34	32	210.2
114.02	13	103	19	203.02	36	33	210.21
212	14	105	30	205.24	74	35	210.23
9801	20	106.1	39	205.31	92.02	42	211.13
9802	24	106.3	55	205.32	94	43	211.36
9803	28	111	56	206.21	95.01	63	211.38
9804.01	37	112	57	211.11	101.22	71	211.39
9804.02	50	115	58	211.12	108.2	72	211.4
	53	116	62	211.22	113	73	211.42
	59	117	64	217.21	118	85	211.43
	60	205.21	65	217.24	201.02	86	213.11
	67	205.23	66	217.31	202.1	92.01	213.12
	69	205.42	68	217.46	202.21	95.02	213.2
	70	205.43	78.21	217.47	203.01	96	213.31
	75	205.44	78.22	217.54	204	206.32	213.33
	78.1	206.1	79	217.55	205.11	206.33	213.34
	81.1	217.1	80	217.58	205.41	206.34	213.41
	82	217.25	81.2	217.6	206.22	206.53	213.51
	89	217.57	87	220.23	206.35	206.54	213.52
	91	220.25	88	220.24	206.51	206.55	213.55
	99.01	220.26	93	221.3	206.52	206.56	213.56
		223.1	97	221.31	206.58	206.57	213.57
			98	221.32	210.22	207	214.1
			102.1	222.1	211.21	208.33	214.2
			102.2	222.2	211.24	208.34	214.3
			106.2	223.21	211.25	208.35	215.3
			107.1	223.22	211.26		215.41
			107.2	223.3	211.35		215.42
				225	211.41		215.43
				226	211.44		215.44
				227	213.54		215.45
					215.47		215.46
					216.2		215.48
					217.44		216.11
					217.52		216.12
					217.53		216.13
					217.56		217.45
					217.59		217.51
					219		
					221.11		
					221.21		
					221.22		
					224.1		

Bank of Bartlett

Loan to Deposit Ratios

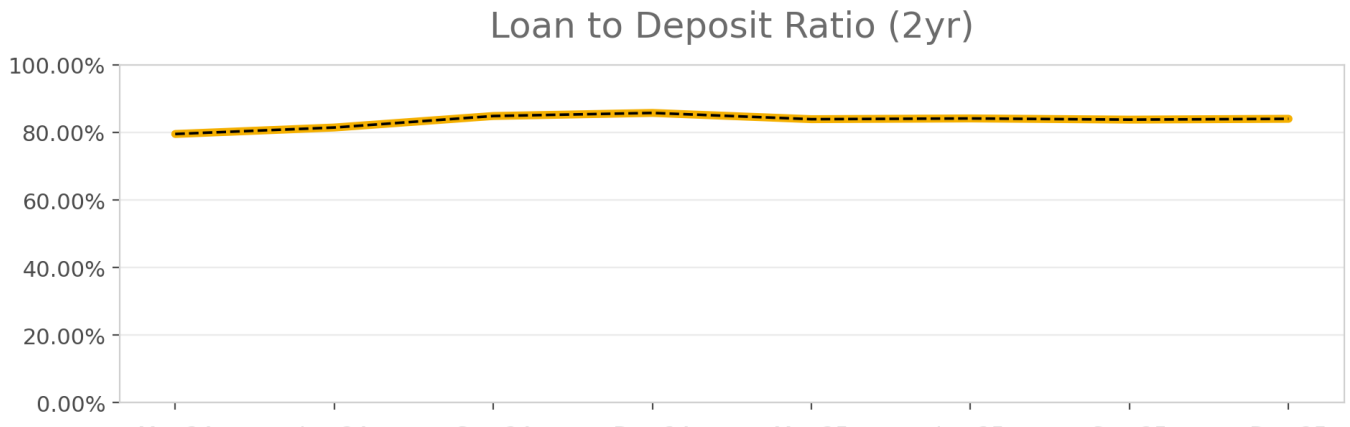
Preceding 2-year period

2024

- Quarter ending March 31 79.57%
- Quarter ending June 30 81.48%
- Quarter ending September 30 84.89%
- Quarter ending December 31 85.8%

2025

- Quarter ending March 31 83.95%
- Quarter ending June 30 84.17%
- Quarter ending September 30 83.82%
- Quarter ending December 31 84.06%



	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25	Dec-25
Series1	79.57%	81.48%	84.89%	85.80%	83.95%	84.17%	83.82%	84.06%

Bank of Bartlett

Appendix A: Federal Reserve CRA Performance Evaluation

PUBLIC DISCLOSURE

June 15, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bank of Bartlett
RSSD #225559

6281 Stage Road
Bartlett, Tennessee 38134

Federal Reserve Bank of St. Louis

P.O. Box 442
St. Louis, Missouri 63166-0442

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

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INSTITUTION'S CRA RATING: This institution is rated SATISFACTORY.

The Lending Test is rated:	**Satisfactory**
The Community Development Test is rated:	**Satisfactory**

Bank of Bartlett meets the criteria for a Satisfactory rating based on the evaluation of the bank's lending and community development activities. The factors supporting the institution's rating are as follows:

- The loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and assessment area credit needs.
- A majority of loans and other lending-related activities are originated in the assessment area.
- The borrower's profile analysis reveals a reasonable distribution among businesses of different revenue sizes and individuals of different income levels, including low- and moderate-income (LMI) levels.
- The geographic distribution of loans reflects a poor dispersion throughout the assessment area.
- There were no CRA-related complaints filed against the bank since the previous CRA evaluation.
- The bank's overall community development performance demonstrates adequate responsiveness to the community development needs of its assessment area, considering the bank's capacity and the need and availability of such opportunities for community development in its assessment area. The bank has responded to these needs through community development loans, qualified investments, and community development services.

SCOPE OF EXAMINATION

The bank's CRA performance was evaluated using the Federal Financial Institutions Examination Council's (FFIEC's) *Intermediate Small Bank Institution Examination Procedures*, which entail two performance tests: the Lending Test and the Community Development Test. Home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small business loans were used to evaluate lending performance, as these loan categories are considered the bank's core business lines based on lending volume and the bank's stated business strategy. Therefore, the loan activity represented by these credit products is deemed indicative of overall lending performance. However, as the bank has a particular emphasis on home mortgage lending, performance based on the HMDA loan category carried the most significance toward overall performance conclusions.

The following table details the performance criterion and the corresponding time periods used in each analysis.

Performance Criterion	Time Period
LTD Ratio	March 31, 2022 – March 31, 2026
Assessment Area Concentration	January 1, 2024 – December 31, 2024
Loan Distribution by Borrower's Profile	
Geographic Distribution of Loans	
Response to Written CRA Complaints	March 28, 2022 – June 14, 2026
Community Development Activities	

Lending Test analyses often entail comparisons of bank performance to assessment area demographics and the performance of other lenders, based on HMDA and CRA aggregate lending data. Unless otherwise noted, assessment area demographics are based on 2020 American Community Survey (ACS) data, and certain business demographics are based on 2024 Dun & Bradstreet data. When analyzing bank performance by comparing lending activity to both demographic data and aggregate lending data, greater emphasis is generally placed on the aggregate lending data, because it is expected to describe many factors impacting lenders within an assessment area. Aggregate lending datasets are updated annually and are, therefore, expected to predict more relevant comparisons. In addition, the bank's lending levels were evaluated in relation to those of comparable financial institutions operating in the same general region. Three other banks were identified as similarly situated peers, with asset sizes ranging from $430.2 million to $615.7 million as of March 31, 2026.

As part of the Community Development Test, the bank's performance was evaluated using the following criteria, considering the bank's capacity and the need and availability of such opportunities for community development in the assessment area:

- The number and dollar amount of community development loans.
- The number and dollar amount of qualified investments and grants.
- The extent to which the bank provides community development services.

The review included community development activities initiated from the date of the bank's previous CRA evaluation to this review date. In addition, investments made prior to the date of the previous CRA evaluation, but still in the bank's portfolio as of this review date, were also considered.

To augment this evaluation, one community contact interview was conducted with a member of the local community to ascertain specific credit needs, opportunities, and local market conditions within the bank's assessment area. Information from this interview also assisted in evaluating the bank's responsiveness to identified community credit needs and community development opportunities. Key details from this community contact interview are included in the *Description of Assessment Area* section.

DESCRIPTION OF INSTITUTION

Bank of Bartlett is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is wholly owned by West Tennessee Bancshares, Inc., a one-bank holding company located in Bartlett, Tennessee. The bank also owns two subsidiaries, one of which is Bartlett Mortgage, Inc., a subsidiary of the bank responsible for all secondary market residential real estate lending.

The bank's branch network consists of seven full-service offices (including the main office) located within Shelby County, Tennessee, with one of these branches located in a moderate-income census tract. Each location features on-site lenders and interactive teller machines (ITMs). The bank did not open or close any locations during the review period. Notably, all branches and full-service ITMs are located in the eastern portions of Shelby County, placing the bank at a competitive disadvantage in serving the western portions of the county, where a majority of the LMI geographies are located.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its customers, and the bank appeared capable of meeting assessment area credit needs based on its available resources and financial products. As of March 31, 2026, the bank reported total assets of $557.5 million. As of the same date, loans and leases outstanding were $385.4 million (69.1 percent of total assets), and deposits totaled $466.8 million. The bank's loan portfolio composition by credit category is displayed in the following table.

Distribution of Total Loans as of March 31, 2026		
Credit Category	**Amount $ (000s)**	**Percentage of Total Loans**
1–4 Family Residential	$276,424	71.7%
Commercial Real Estate	$59,628	15.5%
Commercial and Industrial	$22,066	5.7%
Construction and Development	$14,806	3.8%
Loans to Individuals	$7,300	1.9%
Multifamily Residential	$5,091	1.3%
Total Other Loans	$39	0.0%
TOTAL	**$385,354**	**100%**
Note: Percentages may not total 100.0 percent due to rounding.		

As indicated by the table above, a significant portion of the bank's lending resources is directed to loans secured by 1–4 family residential properties, including HMDA loans and commercial real estate loans. The bank also originates and subsequently sells a significant volume of loans related to residential real estate. As these loans are sold on the secondary market shortly after origination, this activity would not be captured in the table. In 2025, the bank sold 246 mortgage loans on the secondary market.

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on March 28, 2022.

DESCRIPTION OF ASSESSMENT AREA

General Demographics

The assessment area consists of Shelby County, Tennessee, in its entirety, which is part of the Memphis, Tennessee-Mississippi-Arkansas metropolitan statistical area (Memphis MSA). Based on 2020 ACS data, the population was 929,744, and it is composed of 249 census tracts. The western portion of Shelby County is largely urban, while the eastern portion is suburban.

According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2025, there are 33 FDIC-insured depository institutions in the assessment area that operate 205 offices. Bank of Bartlett (operating seven, or 3.4 percent, of offices in the assessment area) ranked 14th in terms of deposit market share, with 1.4 percent of the total assessment area deposit dollars.

As the demographics of this assessment area cover a wide region and the population is diverse, credit needs in the area are also varied and include a standard blend of consumer and business loan products. Furthermore, considering the needs of the LMI population in the assessment area—along with the available sources of community development intermediaries, such as nonprofit agencies and government assistance entities—there is a sufficient level of community development opportunity for financial institution participation.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	51	67	47	72	12	**249**
	20.5%	26.9%	18.9%	28.9%	4.8%	**100%**
Family Population	30,319	57,296	45,722	84,845	1,228	**219,410**
	13.8%	26.1%	20.8%	38.7%	0.6%	**100%**

As shown above, 47.4 percent of the census tracts in the assessment area are LMI geographies, but only 39.9 percent of the family population resides in these tracts. These LMI areas are primarily concentrated in the western portion of the county, in the urban areas of Memphis.

Based on 2020 ACS data, the median family income for the assessment area was $67,286. At the same time, the median family income for the Memphis MSA was $67,639. More recently, the FFIEC estimates the 2024 median family income for the Memphis MSA to be $83,000. The following table displays population percentages of assessment area families by income level compared to the Memphis MSA family population as a whole.

Family Population by Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Assessment Area	54,163	34,582	38,398	92,267	**219,410**
	24.7%	15.8%	17.5%	42.1%	**100%**
Memphis MSA	77,551	53,287	59,775	138,768	**329,381**
	23.5%	16.2%	18.2%	42.1%	**100%**

As shown in the table above, 40.5 percent of families within the assessment area were considered LMI, which is in line with the LMI family percentage of 39.7 percent in the Memphis MSA. The percentage of families living below the poverty threshold in the assessment area, 14.3 percent, is slightly above the 13.1 percent level in the Memphis MSA. Considering these factors, families in the assessment area appear to be similarly affluent to those in the MSA as a whole.

Housing Demographics

Based on housing values, income levels, and rental costs, housing in the assessment area appears to be less affordable than in the Memphis MSA.

Housing Cost Burden						
Area	**Cost Burden – Renters**			**Cost Burden – Owners**		
	Low Income	**Moderate Income**	**All Renters**	**Low Income**	**Moderate Income**	**All Owners**
Assessment Area	79.1%	54.4%	48.3%	66.1%	36.6%	20.1%
Memphis MSA	78.4%	52.5%	46.8%	64.9%	33.5%	19.3%
Cost burden is housing cost that equals 30 percent or more of household income.						

According to the table above, LMI renters in the assessment area are similarly cost burdened to those in the MSA, which suggests that LMI families in both areas might struggle to save for a downpayment and, ultimately, purchase a home. This is further supported by the assessment area having a median rental rate ($957/month) similar to the MSA as a whole ($943/month), corroborated by the community contact, who identified rental assistance as a need in the area.

Additionally, the table shows that LMI homeowners in the assessment area face cost burdens similar to those experienced across the broader Memphis MSA. The median housing value for the assessment area ($158,674) is comparable to the Memphis MSA ($160,469), and the assessment area's housing affordability ratio of 32.8 percent is in line with the Memphis MSA figure of 33.6 percent, reflecting comparable affordability challenges in both areas. The community contact noted that affordable housing stock for LMI families is older and in need of repairs, increasing requests for home repair grants, as many residents face challenges in qualifying for home improvement loans. Based on this information, housing in the assessment area appears to align closely with the overall Memphis MSA.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector, as evidenced by Dun & Bradstreet data indicating that 90.7 percent of assessment area businesses have gross annual revenues of $1 million or less. Furthermore, according to the U.S Department of Labor Bureau of Labor Statistics (BLS), Quarterly Census of Employment and Wages data, there are 473,254 employees in the assessment area (including 62,068 governmental employees). By percentage of nongovernmental employees, the three largest job categories in the assessment area are healthcare and social assistance (17.9 percent), transportation and warehousing (15.7 percent), and retail trade (10.6 percent). The table below details BLS unemployment data (not seasonally adjusted) for the assessment area and Memphis MSA.

Unemployment Levels			
Dataset	**Time Period (Annual Average)**		
	2022	**2023**	**2024**
Assessment Area	4.4%	4.2%	4.5%
Memphis MSA	4.1%	3.8%	4.1%

As shown in the table above, unemployment trends were similar for both the assessment area and the Memphis MSA over the three-year period. Both experienced slight decreases in 2023, while maintaining relatively consistent levels overall, with the assessment area experiencing slightly higher rates.

Community Contact Information

Information from one community contact specializing in affordable housing was used to help shape the performance context in which the bank's activities in this assessment area were evaluated. The contact identified affordable housing and rental assistance as housing-specific needs in the area. Additionally, the area has an older housing stock, with homeowners in need of funding and financing for home repairs. The contact also noted that emerging housing developers and affordable housing projects in the area need access to more traditional bank financing.

The interviewee explained that there is a competitive banking environment with plenty of financial institutions who are actively involved in the community and respond to community needs. However, access to capital and technical assistance were identified as specific needs of small businesses in the area. Additional needs noted included increased marketing and outreach efforts to LMI consumers and small businesses, financial literacy courses, and expanded bank participation in Federal Home Loan Bank programs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

Loan-to-Deposit (LTD) Ratio

One indication of the bank's overall level of lending activity is its LTD ratio. The table below displays the bank's average LTD ratio in comparison to those of regional peers. The average LTD ratio represents a 17-quarter average, dating back to the bank's last CRA evaluation.

LTD Ratio Analysis			
Name	**Headquarters**	**Asset Size $ (000s) as of March 31, 2026**	**Average LTD Ratio**
Bank of Bartlett	Bartlett, Tennessee	$557,460	74.9%
Regional Banks	Brownsville, Tennessee	$568,378	84.6%
	Millington, Tennessee	$430,166	60.1%
	Collierville, Tennessee	$615,691	95.5%

Based on data from the previous table, the bank's level of lending is below that of two peer banks and above that of one bank in the region. During the review period, the bank's quarterly LTD ratio experienced a generally increasing trend, with a 17-quarter average of 74.9 percent. In comparison, the average LTD ratios of two of the three regional peers experienced generally stable trends, while another peer displayed a slightly decreasing trend. Therefore, compared to data from regional banks, the bank's average LTD ratio is reasonable given the bank's size, financial condition, and assessment area credit needs.

Assessment Area Concentration

For the loan activity reviewed as part of this evaluation, the following table displays the number and dollar volume of loans inside and outside the bank's assessment area.

Lending Inside and Outside the Assessment Area January 1, 2024 through December 31, 2024								
Loan Type	**Inside**				**Outside**			
	#	**# %**	**$ (000s)**	**$ %**	**#**	**# %**	**$ (000s)**	**$ %**
HMDA	358	84.8%	$68,539	86.2%	64	15.2%	$10,953	13.8%
Small Business	45	78.9%	$6,478	66.7%	12	21.1%	$3,228	33.3%
TOTAL LOANS	**403**	**84.1%**	**$75,017**	**84.1%**	**76**	**15.9%**	**$14,181**	**15.9%**
Note: Percentages may not total 100.0 percent due to rounding.								

A majority of loans and other lending-related activities were made in the bank's assessment area. As shown above, 84.1 percent of the total loans were made inside the assessment area, accounting for 84.1 percent of the dollar volume of total loans.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is reasonable, based on performance from both loan categories reviewed. While the bank's HMDA loan distribution by borrower's profile is reasonable and performance under the small business category is poor, greater significance is placed on performance in the HMDA loan category given the emphasis on HMDA lending.

Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure as estimated by the FFIEC ($83,000 for the Memphis MSA as of 2024). The following table shows the distribution of HMDA-reported loans by borrower income level in comparison to family population income demographics for the assessment area. Additionally, 2024 aggregate data for the assessment area is displayed.

Borrower Distribution of HMDA Loans							
Borrower Income Level	2024						
	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	8	3.0%	3.8%	$870	1.1%	1.5%	24.7%
Moderate	30	11.2%	13.5%	$5,174	6.4%	8.4%	15.8%
Middle	48	17.9%	16.2%	$12,524	15.6%	14.0%	17.5%
Upper	165	61.6%	38.9%	$58,284	72.4%	48.9%	42.1%
Unknown	17	6.3%	27.6%	$3,675	4.6%	27.2%	0.0%
TOTAL	**268**	**100.0%**	**100.0%**	**$80,527**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	5	5.4%	8.0%	$271	1.8%	3.2%	24.7%
Moderate	16	17.2%	13.3%	$1,805	11.7%	9.2%	15.8%
Middle	12	12.9%	16.2%	$1,539	10.0%	13.6%	17.5%
Upper	49	52.7%	30.2%	$10,110	65.6%	36.1%	42.1%
Unknown	11	11.8%	32.4%	$1,694	11.0%	37.9%	0.0%
TOTAL	**93**	**100.0%**	**100.0%**	**$15,419**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	3	3.3%	8.4%	$145	1.3%	3.1%	24.7%
Moderate	18	19.6%	15.2%	$1,121	10.1%	7.6%	15.8%
Middle	19	20.7%	21.2%	$1,709	15.4%	14.4%	17.5%
Upper	51	55.4%	48.5%	$7,884	71.1%	68.5%	42.1%
Unknown	1	1.1%	6.7%	$236	2.1%	6.5%	0.0%
TOTAL	**92**	**100.0%**	**100.0%**	**$11,095**	**100.0%**	**100.0%**	**100.0%**

Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	3.6%	$0	0.0%	1.8%	N/A
Unknown	3	100.0%	96.4%	$2,834	100.0%	98.2%	N/A
TOTAL	**3**	**100.0%**	**100.0%**	**$2,834**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	16	3.5%	5.2%	$1,286	1.2%	1.8%	24.7%
Moderate	64	14.0%	13.4%	$8,100	7.4%	7.7%	15.8%
Middle	79	17.3%	16.7%	$15,772	14.4%	12.6%	17.5%
Upper	265	58.1%	38.0%	$76,278	69.4%	42.9%	42.1%
Unknown	32	7.0%	26.7%	$8,439	7.7%	34.9%	0.0%
TOTAL	**456**	**100.0%**	**100.0%**	**$109,875**	**100.0%**	**100.0%**	**100.0%**

Source: 2024 FFIEC Census Data
2016–2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

As displayed in the preceding table, the bank's percentage of lending to low-income borrowers (3.5 percent) is substantially below the low-income family population figure (24.7 percent) and slightly below the 2024 aggregate lending level to low-income borrowers (5.2 percent), reflecting poor performance. However, the bank's level of lending to moderate-income borrowers (14.0 percent) is in line with the moderate-income family population percentage (15.8 percent) and the 2024 aggregate lending level to moderate-income borrowers (13.4 percent), reflecting reasonable performance. Therefore, considering performance to both income categories, the bank's overall distribution of loans by borrower's profile is reasonable.

Next, small business loans were reviewed to determine the bank's lending levels to businesses of different sizes. The following table shows the distribution of 2024 small business loans by loan amount and business revenue size compared to Dun & Bradstreet and aggregate data.

Small Business Loans by Revenue and Loan Size									
Business Revenue and Loan Size		2024							
		Count			Dollars			Total Businesses	
		Bank		Aggregate	Bank		Aggregate		
		#	%	%	$ (000s)	$ %	$ %	%	
Business Revenue	$1 Million or Less	14	31.1%	46.1%	$1,907	29.4%	29.4%	90.7%	
	Over $1 Million/ Unknown	31	68.9%	53.9%	$4,572	70.6%	70.6%	9.3%	
	TOTAL	**45**	**100.0%**	**100.0%**	**$6,479**	**100.0%**	**100.0%**	**100.0%**	
Loan Size	$100,000 or Less	31	68.9%	91.7%	$1,610	24.8%	32.8%		
	$100,001–$250,000	5	11.1%	4.6%	$806	12.4%	18.4%		
	$250,001–$1 Million	9	20.0%	3.7%	$4,063	62.7%	48.8%		
	Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%		
	TOTAL	**45**	**100.0%**	**100.0%**	**$6,479**	**100.0%**	**100.0%**		
Loan Size Revenue $1 Million or Less	$100,000 or Less	8	57.1%		$259	13.6%			
	$100,001–$250,000	3	21.4%		$428	22.4%			
	$250,001–$1 Million	3	21.4%		$1,220	64.0%			
	Over $1 Million	0	0.0%		$0	0.0%			
	TOTAL	**14**	**100.0%**		**$1,907**	**100.0%**			

The bank's level of lending to small businesses is poor. The bank originated 31.1 percent of its small business loans to businesses with revenues of $1 million or less. In comparison, assessment area demographics estimate that 90.7 percent of businesses in the assessment area had annual revenues of $1 million or less, and the 2024 aggregate lending level to small businesses is 46.1 percent.

Geographic Distribution of Loans

As noted previously, the assessment area includes 51 low-income and 67 moderate-income census tracts, representing 47.4 percent of all assessment area census tracts. Overall, the bank's geographic distribution of loans in this assessment area reflects poor performance throughout these LMI census tracts, based on the HMDA and small business loan categories. As previously stated, performance in the HMDA loan category carried the most significance in the overall rating for geographic distribution. An analysis of the lending dispersion of both loan products revealed that the bank had loan activity in 57.0 percent of all assessment area census tracts and in 42.4 percent of LMI census tracts in the assessment area. While this analysis does not indicate evidence of conspicuous lending gaps, the geographic distribution of loans is nevertheless poor based on the review of both loan products individually, as discussed below.

The following table displays the geographic distribution of 2024 HMDA loans compared to owner-occupied housing demographics and aggregate performance for the assessment area.

Geographic Distribution of HMDA Loans							
Census Tract Income Level	**2024**						
	Bank Loans		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	10	3.7%	8.6%	$1,329	1.7%	3.6%	9.0%
Moderate	29	10.8%	20.1%	$4,354	5.4%	11.0%	23.3%
Middle	55	20.5%	22.4%	$12,826	15.9%	18.6%	21.3%
Upper	174	64.9%	48.8%	$62,018	77.0%	66.5%	46.0%
Unknown	0	0.0%	0.2%	$0	0.0%	0.2%	0.4%
TOTAL	**268**	**100.0%**	**100.0%**	**$80,527**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	3	3.2%	10.5%	$488	3.2%	5.3%	9.0%
Moderate	11	11.8%	22.6%	$936	6.1%	14.5%	23.3%
Middle	17	18.3%	23.2%	$2,395	15.5%	21.1%	21.3%
Upper	62	66.7%	43.3%	$11,600	75.2%	58.8%	46.0%
Unknown	0	0.0%	0.3%	$0	0.0%	0.2%	0.4%
TOTAL	**93**	**100.0%**	**100.0%**	**$15,419**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	7.8%	$0	0.0%	3.3%	9.0%
Moderate	4	4.3%	18.4%	$256	2.3%	9.9%	23.3%
Middle	15	16.3%	23.1%	$1,499	13.5%	16.6%	21.3%
Upper	73	79.3%	50.6%	$9,340	84.2%	70.0%	46.0%
Unknown	0	0.0%	0.1%	$0	0.0%	0.1%	0.4%
TOTAL	**92**	**100.0%**	**100.0%**	**$11,095**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	2	66.7%	38.6%	$2,334	82.4%	26.2%	24.6%
Moderate	1	33.3%	19.3%	$500	17.6%	18.3%	23.7%
Middle	0	0.0%	26.5%	$0	0.0%	23.5%	21.4%
Upper	0	0.0%	10.8%	$0	0.0%	31.5%	27.4%
Unknown	0	0.0%	4.8%	$0	0.0%	0.5%	3.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$2,834**	**100.0%**	**100.0%**	**100.0%**

Total Home Mortgage Loans							% of Owner-Occupied Units
Low	15	3.3%	8.9%	$4,151	3.8%	6.0%	9.0%
Moderate	45	9.9%	20.2%	$6,046	5.5%	12.3%	23.3%
Middle	87	19.1%	22.6%	$16,720	15.2%	19.5%	21.3%
Upper	309	67.8%	48.1%	$82,958	75.5%	62.0%	46.0%
Unknown	0	0.0%	0.2%	$0	0.0%	0.2%	0.4%
TOTAL	**456**	**100.0%**	**100.0%**	**$109,875**	**100.0%**	**100.0%**	**100.0%**

Source: 2024 FFIEC Census Data
2016–2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The analysis of HMDA loans revealed poor lending performance to borrowers residing in low-income geographies. The bank's total penetration of low-income census tracts by number of loans (3.3 percent) is below the percentage of owner-occupied housing units in low-income census tracts (9.0 percent). The bank's performance in low-income census tracts is also below that of other lenders in the assessment area, based on 2024 HMDA aggregate data, which indicates that 8.9 percent of aggregate HMDA loans inside this assessment area were made to borrowers residing in low-income geographies.

Bank performance in moderate-income census tracts was also below comparison data and deemed poor. The number of HMDA loans made in moderate-income census tracts (9.9 percent) is well below the percentage of owner-occupied housing units in moderate-income census tracts (23.3 percent). The bank's performance in moderate-income census tracts is also significantly below that of other lenders based on aggregate lending data, which indicates that 20.2 percent of aggregate HMDA loans inside the assessment area were made to borrowers residing in moderate-income census tracts, reflecting poor performance.

Second, the bank's geographic distribution of small business loans was reviewed. The following table displays 2024 small business loan activity by geography income level compared to the location of businesses throughout the bank's assessment area and 2024 small business aggregate data.

Geographic Distribution of Small Business Loans							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	4	8.9%	9.3%	$445	6.9%	12.9%	11.3%
Moderate	17	37.8%	19.2%	$2,358	36.4%	20.8%	23.7%
Middle	5	11.1%	17.3%	$1,091	16.8%	14.4%	19.7%
Upper	18	40.0%	51.9%	$2,505	38.7%	49.0%	42.7%
Unknown	1	2.2%	2.3%	$78	1.2%	2.9%	2.7%
TOTAL	**45**	**100.0%**	**100.0%**	**$6,477**	**100.0%**	**100.0%**	**100.0%**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016–2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank's level of lending in low-income census tracts (8.9 percent) is slightly below the estimated percentage of businesses operating inside these census tracts (11.3 percent) but in line with 2024 aggregate lending levels in low-income census tracts (9.3 percent), resulting in reasonable performance. The bank's percentage of loans in moderate-income census tracts (37.8 percent) exceeds both the aggregate lending percentage (19.2 percent) and the percentage of small businesses in moderate-income census tracts (23.7 percent), representing excellent performance. Therefore, the bank's overall geographic distribution of small business loans is excellent.

Responses to Complaints

No CRA-related complaints were filed against the bank during this review period (March 28, 2022, through June 14, 2026).

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test is rated Satisfactory. The bank demonstrates adequate responsiveness to the community development needs of its assessment area, considering the bank's capacity and the need and availability of such opportunities for community development in the assessment area. The bank has addressed the community development needs of the assessment area through community development loans, qualified investments, and community development services.

The following table summarizes the bank's qualified community development activity during the review period, along with qualified prior-period investments that remain in the bank's portfolio.

Total Community Development Activities Inside the Assessment Area March 28, 2022 – June 14, 2026		
Community Development Component	**#**	**$**
Loans	29	$4.8 million
Investments, Current and Prior	6	$6.8 million
Current Period	2	$2.3 million
Prior Period, Still Outstanding	6	$4.6 million
Donations	6	$8,300
Services	17 services	4 organizations

During the review period, the bank made 29 qualifying loans in its assessment area totaling approximately $4.8 million. Of those loans, the majority were in support of job creation and retention for the purpose of economic development.

The bank also made community development investments and donations in its assessment areas totaling $6.9 million. This amount included two new qualified investments totaling $2.3 million: a mortgage-backed security supporting affordable housing and a certificate of deposit benefiting a low-income credit union. The prior-period investments consisted of mortgage-backed securities and one investment in support of a Small Business Administration loan fund. Furthermore, the six donations were to three separate organizations having a community development purpose.

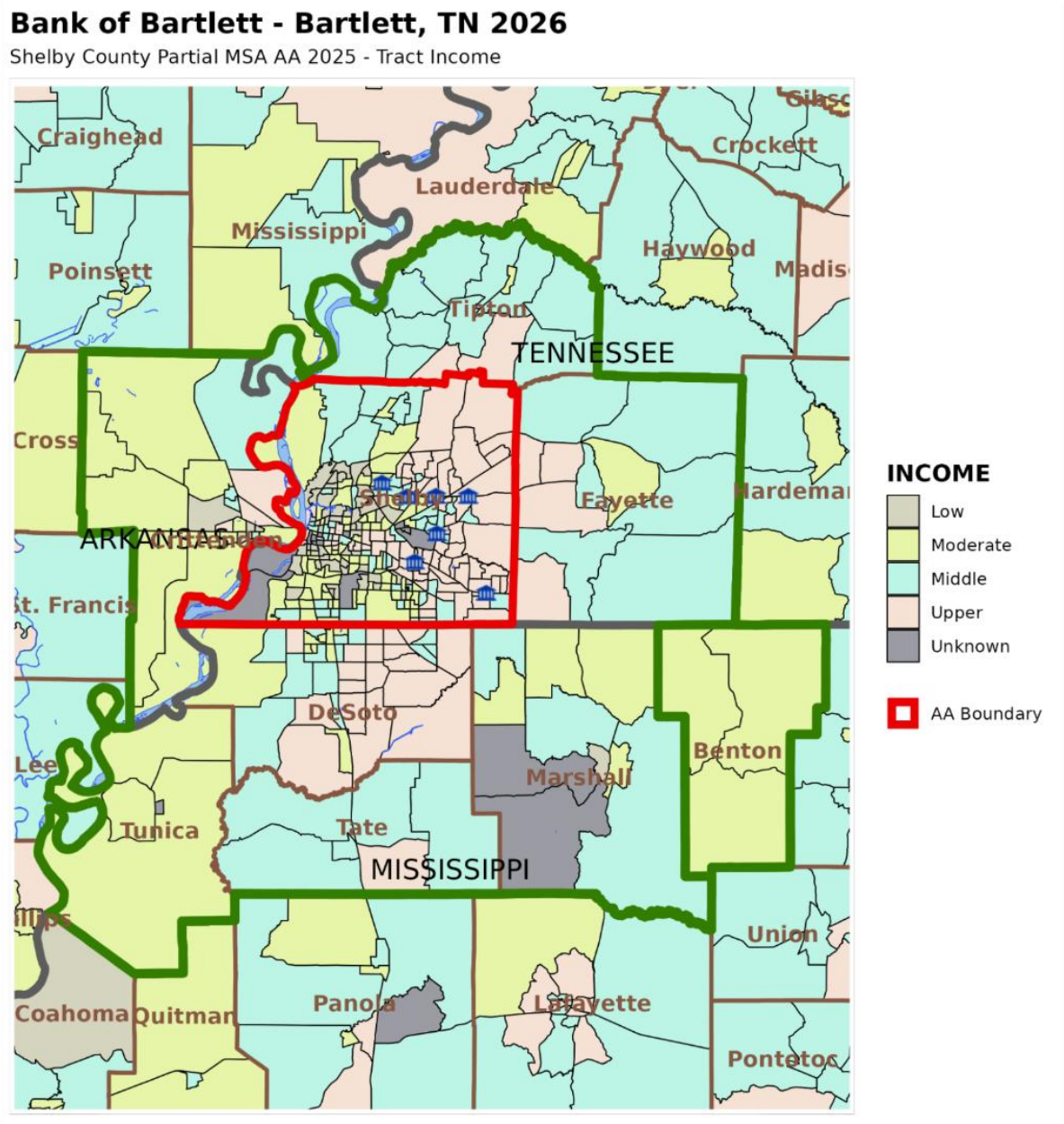
Four employees contributed community development services to three different agencies through 17 independent events. Most community service events involved employees providing financial expertise to affordable housing agencies, primarily assisting these agencies in receiving grants for affordable housing initiatives that help LMI individuals and families.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Based on findings from the Consumer Affairs examination, including a fair lending analysis performed under Regulation B – Equal Credit Opportunity and the Fair Housing Act requirements, conducted concurrently with this CRA evaluation, no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

APPENDIX A – MAP OF THE ASSESSMENT AREA

Assessment Area: Shelby County



APPENDIX B – GLOSSARY

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

Assessment area: One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

Census tract: A small subdivision of metropolitan and nonmetropolitan 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 on 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 contact: Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

Community development: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of $1 million or less; (4) activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and geographies.

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.

Demographics: The statistical characteristics of human populations (e.g., age, race, sex, and income) used especially to identify markets.

Distressed nonmetropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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 nonrelatives 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 (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 who 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 income of applicants; the amount of loan requested; and the disposition of the application (e.g., 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: One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Housing affordability ratio: Calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

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

Median family income: The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

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

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

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

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

Nonmetropolitan statistical area (nonMSA): Not part of a metropolitan area. (See metropolitan area.)

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.

Performance context: The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

Performance criteria: These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

Performance evaluation (PE): A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

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 businesses/small farms: A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were $1 million or less.

Small loan(s) to business(es): That is, "small business loans" are included in "loans to small businesses" as defined in the Consolidated Reports of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of $1 million or less and typically are secured by either 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): That is, "small farm loans" are included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Reports 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.

Underserved middle-income geography: A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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