



## **CRA Public File**

Lineage Bank is required to make this file available for public inspection under the Community Reinvestment Act (CRA). The CRA Public File is to be printed or provided electronically at no cost to anyone who requests a copy. The Bank may charge a reasonable fee not to exceed the cost of copying and mailing of printed version. The entire file may be made available to anyone immediately; however, some portions may be provided within 5 calendar days.

For comments or questions about our CRA Performance, please contact:

**Holly Wyatt, CRA Officer**

Lineage Bank  
3359 Aspen Grove Drive  
Franklin TN 37067

As required by the Community Reinvestment Act, the information included in this file should be current as of April 1 of each year.

The CRA Statement is posted with the lobby signs in each bank location.

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## Public Comments

Lineage Bank welcomes public comments as it strives to improve the level of quality and performance of the communities it serves. The Community Reinvestment Act requires the bank to publish the current and two previous years, all written comments received from the public on how the bank helps meet the credit needs of the communities it serves.

**As of April 1, 2025, Lineage Bank has not received any CRA related public comment for the past two years.**

## Locations

### Headquarters

#### **Cool Springs - Opened April 21<sup>st</sup>, 2022**

3359 Aspen Grove Drive, Suite 100, Franklin TN 37067

Phone: (629) 248-9092

Business Hours:      Monday – Thursday 8:30 a.m. – 4:00 p.m.  
Friday                      8:30 a.m. – 5:00 p.m.  
ATM available

### Branches

#### **Downtown Franklin - Opened June 23<sup>rd</sup>, 2021**

120 5<sup>th</sup> Ave N, Franklin TN 37064

Phone: (629) 248-9085

Business Hours:      Monday – Thursday 8:30 a.m. – 4:00 p.m.  
Friday                      8:30 a.m. – 5:00 p.m.  
ATM available

#### **Citizens Bank and Trust Co, a division of the Lineage Bank**

1359 W Main St., Atwood TN 38220-2825

Phone: (731) 662-7171

Business Hours:      Monday – Thursday 8:30 a.m. – 4:00 p.m.  
Friday                      8:30 a.m. – 5:00 p.m.  
ATM available

### Loan Production Office

#### **Lineage Bank Mortgage – Union City – Closed December 2024**

800 E Reelfoot Ave, Ste 100-A, Union City TN 38261

Phone: (866) 888-8667

Business Hours:      Monday – Friday      8:00 a.m. – 4:30 p.m.

#### **Lineage Bank Mortgage – Closed January 2024**

381 Mallory Station Rd, Ste. 202, Franklin TN 37067

Phone: (866) 888-8667

Business Hours:      Monday – Thursday 8:30 a.m. – 4:00 p.m.  
Friday                      8:30 a.m. – 5:00 p.m.

**Products and Services**

**Deposits**

Regular Checking

Interest Checking

Club Checking

Money Market

Christmas Club Savings

Certificates of Deposits

Individual Retirement Accounts

Business Checking

Business Interest Checking

Business Money market

Public Funds

**Loans**

Auto Loans

Consumer Secured Loans

Installment Loans

Unsecured Loans

Home Loans

Commercial Loans

Commercial Real Estate Loans

Construction Loans

**Other Products**

Safe Deposit Boxes

Mobile Banking

Online Banking

Treasury Management

Remote Deposit Capture

Mobile Check Deposit

For detailed information on the bank's products and services, please visit [www.lineagebank.com](http://www.lineagebank.com).

### Fee Schedule

**Fees and Charges.** The following fees and charges may be assessed against your account:

Check printing fees vary by the style of check ordered.	
Account balancing assistance - per hour	\$15.00
Account research - per hour	\$20.00
Cashier's Checks	\$5.00
Deposited checks (and other items) returned unpaid (Chargebacks) - each	\$10.00
Garnishments - each	\$30.00
Levies - each	\$30.00
Non-sufficient Funds (Returned Item) - each item	\$30.00
Overdraft (Paid Item) - each	\$30.00
Photocopies - each	\$0.25
Stop payments - each	\$30.00
Wire Transfers - Domestic Incoming and Outgoing - each	\$20.00
Wire Transfers - International Incoming and Outgoing - each	\$50.00

No Service/Maintenance Charge/Fee for students or customers 65 or greater.

### Assessment Areas

Lineage Bank's main assessment areas are:

- ✓ Williamson County
- ✓ Carroll County

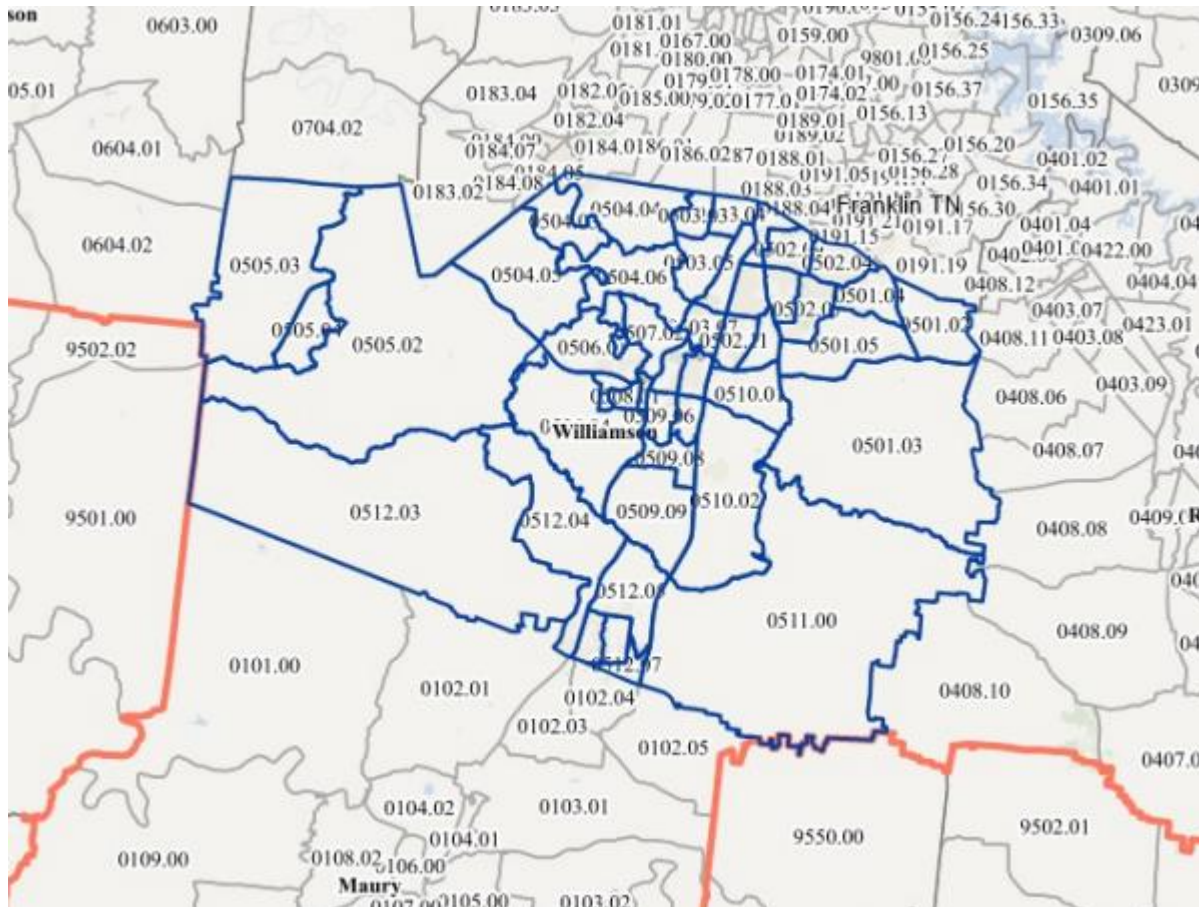
### Loan-to-Deposit Information

Lineage Bank			
Quarterly Loan to Deposit Ratio			
Date	Gross Loans	Total Deposits	Ratio
12/31/2019	9,557,000.00	22,265,000.00	42.92%
3/31/2020	9,218,000.00	22,696,000.00	40.62%
6/30/2020	9,184,000.00	22,220,000.00	41.33%
9/30/2020	9,833,000.00	22,307,000.00	44.08%
12/31/2020	9,538,000.00	24,517,000.00	38.90%
3/31/2021	9,011,000.00	28,485,000.00	31.63%
6/30/2021	14,024,000.00	41,478,000.00	33.81%
9/30/2021	30,292,000.00	54,583,000.00	55.50%
12/31/2021	50,261,000.00	71,054,000.00	70.74%
3/31/2022	72,053,000.00	108,544,000.00	66.38%
6/30/2022	97,126,000.00	141,817,000.00	68.49%
9/30/2022	111,543,000.00	207,890,000.00	53.65%
12/31/2022	135,369,000.00	218,346,000.00	62.00%
3/31/2023	138,599,000.00	214,276,000.00	64.68%
6/30/2023	149,981,000.00	209,303,000.00	71.66%
9/30/2023	142,639,000.00	209,380,000.00	68.12%
12/31/2023	143,675,000.00	262,917,000.00	54.65%
3/31/2024	129,402,000.00	294,452,000.00	43.95%
6/30/2024	127,045,000.00	248,459,000.00	51.13%
9/30/2024	117,448,000.00	190,950,000.00	61.51%
12/31/2024	114,304,000.00	203,403,000.00	56.20%

Assessment Areas Census Maps

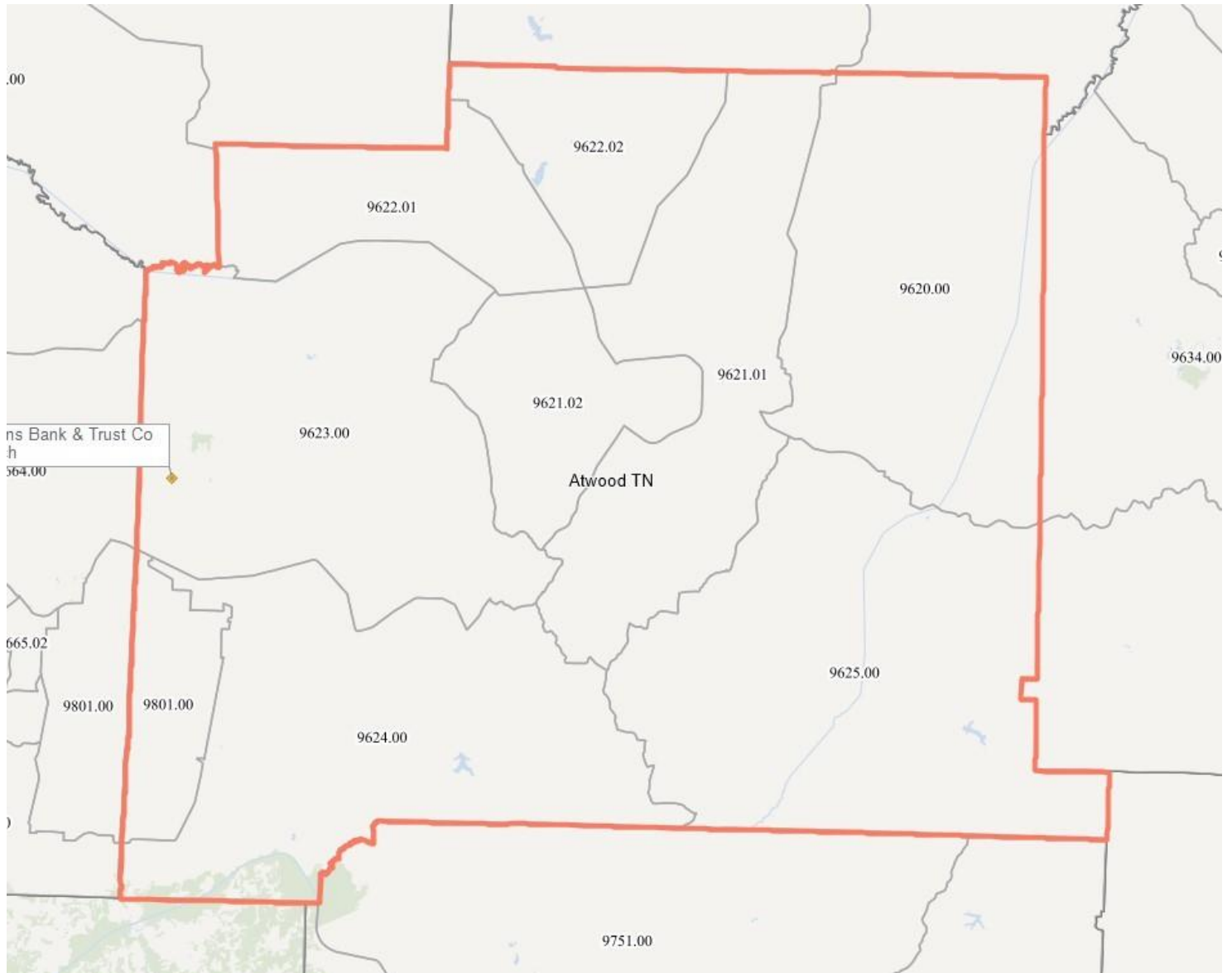
Enclosed are the census maps for Williamson and Carroll counties.

Williamson County





Carroll County



### Assessment Areas – Census Information

Enclosed is the Census Information for Williamson<sup>1</sup> and Carroll<sup>2</sup> Counties.

2024 FFIEC Census Report - Summary Census Demographic Information  
 State: 47 - TENNESSEE (TN)  
 County: 187 - WILLIAMSON COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
47	187	0501.02	Upper	No	178.87	\$101,700	\$181,911	\$146,054	7462	22.00	1642	1579	1642
47	187	0501.03	Upper	No	161.20	\$101,700	\$163,940	\$131,630	7004	15.96	1118	2374	2501
47	187	0501.04	Upper	No	200.18	\$101,700	\$203,583	\$163,456	5714	29.47	1684	1142	1380
47	187	0501.05	Upper	No	222.04	\$101,700	\$225,815	\$181,302	9689	20.84	2019	1778	1982
47	187	0502.04	Upper	No	189.23	\$101,700	\$192,447	\$154,514	5726	25.18	1442	1794	1904
47	187	0502.05	Upper	No	155.55	\$101,700	\$158,194	\$127,014	3596	13.96	502	1177	1211
47	187	0502.06	Upper	No	230.19	\$101,700	\$234,103	\$187,955	3225	15.35	495	887	968
47	187	0502.07	Upper	No	264.26	\$101,700	\$268,752	\$215,781	4391	24.48	1075	1212	1259
47	187	0502.09	Upper	No	239.16	\$101,700	\$243,226	\$195,286	4250	17.84	758	1134	1239
47	187	0502.10	Upper	No	255.14	\$101,700	\$259,477	\$208,333	2740	14.05	385	670	794
47	187	0502.11	Upper	No	124.94	\$101,700	\$127,064	\$102,023	6641	44.26	2939	683	815
47	187	0502.12	Upper	No	266.06	\$101,700	\$270,583	\$217,250	2069	20.54	425	590	686
47	187	0503.03	Upper	No	242.95	\$101,700	\$247,080	\$198,375	3067	7.53	231	1044	1094
47	187	0503.04	Upper	No	259.86	\$101,700	\$264,278	\$212,188	2549	12.24	312	541	629
47	187	0503.05	Upper	No	306.17	\$101,700	\$311,375	\$250,001	2799	14.11	395	901	1021
47	187	0503.06	Upper	No	152.32	\$101,700	\$154,909	\$124,375	2069	23.97	496	609	721
47	187	0503.07	Middle	No	108.95	\$101,700	\$110,802	\$88,966	3858	25.53	985	979	1373
47	187	0504.03	Upper	No	183.98	\$101,700	\$187,108	\$150,227	2026	9.62	195	754	824
47	187	0504.04	Upper	No	260.95	\$101,700	\$265,386	\$213,077	6890	9.52	656	2453	2453
47	187	0504.05	Upper	No	219.42	\$101,700	\$223,150	\$179,167	2915	7.51	219	863	958
47	187	0504.06	Upper	No	200.11	\$101,700	\$203,512	\$163,397	6094	9.98	608	1645	1793
47	187	0505.02	Upper	No	127.25	\$101,700	\$129,413	\$103,906	4245	10.91	463	1095	1544
47	187	0505.03	Middle	No	86.41	\$101,700	\$87,879	\$70,556	5735	11.84	679	1675	2280
47	187	0505.04	Middle	No	90.83	\$101,700	\$92,374	\$74,167	4490	12.58	565	1217	1384
47	187	0506.01	Upper	No	136.12	\$101,700	\$138,434	\$111,152	5903	23.28	1374	1700	1926
47	187	0506.03	Upper	No	143.24	\$101,700	\$145,675	\$116,959	3185	26.69	850	1069	1162

\* Will automatically be included in the 2025 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
47	187	0506.04	Upper	No	172.04	\$101,700	\$174,965	\$140,476	9551	10.94	1045	2419	2759
47	187	0507.01	Middle	No	118.57	\$101,700	\$120,586	\$96,818	4303	14.59	628	1198	1467
47	187	0507.02	Upper	No	179.06	\$101,700	\$182,104	\$146,214	4561	11.25	513	1428	1536
47	187	0508.01	Moderate	No	65.36	\$101,700	\$66,471	\$53,375	4841	54.58	2642	1086	1864
47	187	0508.02	Upper	No	147.12	\$101,700	\$149,621	\$120,129	1225	9.22	113	371	601
47	187	0509.04	Middle	No	115.85	\$101,700	\$117,819	\$94,602	5234	40.94	2143	983	1259
47	187	0509.05	Upper	No	136.31	\$101,700	\$138,627	\$111,307	6483	26.52	1719	1264	1497
47	187	0509.06	Upper	No	154.56	\$101,700	\$157,188	\$126,203	5487	12.58	690	1884	1989
47	187	0509.07	Upper	No	142.45	\$101,700	\$144,872	\$116,321	5823	17.60	1025	1440	1650
47	187	0509.08	Upper	No	182.35	\$101,700	\$185,450	\$148,897	4292	11.23	482	1327	1351
47	187	0509.09	Upper	No	199.20	\$101,700	\$202,586	\$162,652	4630	13.61	630	1329	1455
47	187	0510.01	Upper	No	190.72	\$101,700	\$193,962	\$155,732	8497	22.43	1906	2443	2515
47	187	0510.02	Upper	No	174.66	\$101,700	\$177,629	\$142,621	11631	20.08	2336	2515	2906
47	187	0511.00	Upper	No	164.85	\$101,700	\$167,652	\$134,609	8608	12.72	1095	2550	3135
47	187	0512.03	Middle	No	94.84	\$101,700	\$96,452	\$77,440	3531	9.23	326	1028	1288
47	187	0512.04	Upper	No	155.46	\$101,700	\$158,103	\$126,944	6696	15.96	1069	1555	1780
47	187	0512.05	Upper	No	127.23	\$101,700	\$129,393	\$103,894	9173	15.63	1434	1859	2314
47	187	0512.06	Upper	No	126.78	\$101,700	\$128,935	\$103,520	8405	22.09	1857	2356	2772
47	187	0512.07	Middle	No	116.83	\$101,700	\$118,816	\$95,397	7779	21.66	1685	1480	1784
47	187	0512.08	Upper	No	129.42	\$101,700	\$131,620	\$105,677	8644	16.98	1468	2297	2690

**2024 FFIEC Census Report - Summary Census Demographic Information**  
**State: 47 - TENNESSEE (TN)**  
**County: 017 - CARROLL COUNTY**



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
47	017	9620.00	Middle	No	95.59	\$69,100	\$66,053	\$53,533	4260	12.14	517	1338	2167
47	017	9621.01	Middle	No	102.93	\$69,100	\$71,125	\$57,644	3373	16.01	540	674	1116
47	017	9621.02	Upper	No	120.14	\$69,100	\$83,017	\$67,279	3831	20.78	796	890	1580
47	017	9622.01	Middle	No	105.99	\$69,100	\$73,239	\$59,356	3210	23.89	767	858	1457
47	017	9622.02	Upper	No	134.82	\$69,100	\$93,161	\$75,497	4583	14.90	683	1180	1956
47	017	9623.00	Middle	No	117.91	\$69,100	\$81,476	\$66,029	4395	18.07	794	1568	2278
47	017	9624.00	Upper	No	121.65	\$69,100	\$84,060	\$68,125	2612	10.49	274	898	1244
47	017	9625.00	Middle	No	100.45	\$69,100	\$69,411	\$56,250	2176	14.94	325	688	1099
47	017	9801.00	Unknown	No	0.00	\$69,100	\$0	\$0	0	0.00	0	0	0
47	017	9999.99	Middle	No	111.66	\$69,100	\$77,157	\$62,532	28440	16.51	4696	8094	12897

<sup>1</sup> Source: <https://apps.ffiec.gov/census/report.aspx?year=2024&county=187&tract=ALL&state=47&report=demographic>

<sup>2</sup> Source: <https://apps.ffiec.gov/census/report.aspx?year=2024&county=017&tract=ALL&state=47&report=demographic>



## Community Reinvestment Act (CRA) Performance Evaluation

Enclosed is the bank's most recent CRA Performance Evaluation.

## **PUBLIC DISCLOSURE**

May 7, 2018

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Citizens Bank & Trust Company  
Certificate Number: 6100

1359 West Main Street  
Atwood, Tennessee 38220

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Dallas Region – Memphis Area Office

6060 Primacy Parkway, Suite 300  
Memphis, Tennessee 38119

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

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## INSTITUTION RATING

**INSTITUTION'S COMMUNITY REINVESTMENT ACT (CRA) RATING:** This institution is rated **Satisfactory**. An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Citizens Bank & Trust Company's satisfactory performance under the Lending Test supports the overall rating. The institution did not request consideration of its investments and services, nor did examiners identify any discriminatory or other illegal credit practices. Therefore, these considerations did not affect the overall rating. The following discussion summarizes the institution's performance.

- The institution displayed a reasonable loan-to-deposit ratio given the institution's size, financial condition, and assessment area credit needs. The reasonable overall and comparative levels support this conclusion.
- The institution originated a majority of loans inside the assessment area. A majority of consumer and residential loans, by number and dollar volume, inside the assessment area supports this conclusion.
- The institution's assessment area consists entirely of middle-income geographies; therefore, because of the homogeneous composition of the assessment area, an analysis of the geographic distribution had no impact on the overall analysis.
- The institution established a reasonable record regarding its borrower profile. An excellent record of consumer lending hampered by the poor residential lending record supports this conclusion.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the rating.



## SCOPE OF EVALUATION

### **General Information**

This evaluation covers the period from October 2, 2012, to May 7, 2018, the date of the previous CRA evaluation to this evaluation's date. Examiners used the Interagency Small Institution Examination Procedures to evaluate Citizens Bank & Trust Company's CRA performance.

The Lending Test considered the institution's performance according to the following criteria:

- Loan-to-deposit ratio
- Assessment area concentration
- Geographic distribution
- Borrower profile
- Response to CRA-related complaints

### **Assessment Area Weighting**

This full-scope evaluation includes institution activities in its sole designated non-metropolitan statistical area (Non-MSA) assessment area (AA). The AA includes two tracts in Carroll County, Tennessee and two tracts in Gibson County, Tennessee.

### **Loan Products Reviewed**

CRA Small Institution procedures require examiners to determine the institution's major product lines from which to review. As an initial matter, examiners may select from among the same loan categories used for CRA Large Institution evaluations: home mortgage, small business, small farm, and consumer loans. The following table illustrates the institution's originations over the 2017 calendar year by loan type.

2017 Loans Originated or Purchased				
Loan Category	#	%	\$(000s)	%
Commercial*	3	1.3	107	2.9
Consumer	200	90.1	1,986	53.2
Residential	19	8.6	1,642	43.9
<b>Total Loans</b>	<b>222</b>	<b>100.0</b>	<b>3,735</b>	<b>100.0</b>

Source: Bank Records (2017).  
\*Commercial equates to commercial & industrial loans combined with commercial real estate loans.

Considering the dollar volume and number of loans originated during 2017, as well as management's stated business strategy, examiners determined the institution's major product lines as consumer and residential loans. Consumer loans represent 90.1 percent by number and 53.2 percent by dollar volume and residential loans (1-4 family combined with multi-family residential) at 8.6 percent by number and 43.9 percent by dollar volume. Commercial loans (commercial & industrial loans combined with commercial real estate) do not represent a major product line, at 1.3 percent by number and 2.9 percent by dollar volume. Therefore, a review of commercial lending would not materially affect any conclusions or ratings; and this evaluation does not discuss it. In addition, agricultural loans do not represent a major product line, as the

institution did not originate any farm loans in 2017; therefore, this evaluation does not discuss them.

Consequently, this evaluation considered a random sample of consumer loans. From the universe of 200 consumer loans originated or purchased in 2017, examiners selected a random sample of 37 loans totaling nearly \$299,243 for analysis, based on a 90 percent confidence interval with 15 percent precision level. Of those 37 loans, examiners used the 26 consumer loans, totaling \$198,290 originated inside the institution's AA to analyze the borrower profile factor.

Additionally, this evaluation considered all 19 residential loans, totaling \$1.6 million originated or purchased by the institution in 2017. Of those 19 loans, examiners used 15 residential loans, totaling \$1.1 million inside the institution's AA to analyze the borrower profile factor.

### ***Loan Product Weighting***

Examiners considered the distribution of originated loans in 2017, as well as the loans outstanding as of the December 31, 2017, Report of Income and Condition when weighting the applicable loan products. As seen in the following table, using the full universes of consumer and residential loans, examiners determined consumer loans comprise a larger volume of the institution's activity reviewed by both number and dollar volume. Given the institution's record of originating consumer and residential loans in 2017, as well as the distribution of outstanding loans, examiners placed more weight on the consumer lending conclusions.

<b>Universes of Loan Categories Reviewed</b>				
<b>Loan Category</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Consumer	200	91.3	1,986	54.7
Residential	19	8.7	1,642	45.3
<b>Total Loans</b>	<b>219</b>	<b>100.0</b>	<b>3,628</b>	<b>100.0</b>

*Source: Bank Records (2017).*

For the Lending Test, examiners reviewed the number and dollar volume of consumer and residential loans. While this evaluation presents both number and dollar volume, examiners focused on performance by number of loans because the number of loans is a better indicator of the number of individuals served.

## **DESCRIPTION OF INSTITUTION**

### ***Background***

A wholly owned subsidiary of Bumpushares, Inc., Citizens Bank & Trust Company is a full-service \$25.9 million institution operating from a single banking office in Atwood, Tennessee. The institution operates with no affiliates or subsidiaries. The institution received a "Satisfactory" rating at its previous FDIC Performance Evaluation, dated October 2, 2012, based on Interagency Small Institution Examination Procedures.

### Operations

Citizens Bank & Trust Company operates as a full-service community institution with a focus on consumer lending. The institution's single office operates in a Carroll County, Tennessee, middle-income census tract. The institution experienced no opening or closing of offices and no merger activity since the last evaluation. It offers an array of deposit and loan products for businesses and consumers. The institution maintains a website used primarily for advertising and a cash dispensing automated teller machine (ATM) at its main office.

### Ability and Capacity

As of December 31, 2017, the institution's \$25.9 million in total assets centered in securities at \$11.0 million (42.5 percent), net loans at \$9.9 million (38.4 percent) and federal funds sold at \$2.1 million (8.1 percent). The remaining 11.0 percent of total assets were comprised primarily of cash, premises, and other assets. Total deposits were \$23.4 million as of this date. The table below reflects the institution's asset distribution as of the December 31, 2017, Report of Income and Condition.

Asset Distribution		
Asset Category	\$(000s)	%
Cash	2,298	8.9
Securities	10,991	42.5
Federal Funds Sold	2,100	8.1
Net Loans & Leases	9,945	38.4
Premises & Fixed Assets	243	0.9
Other Real Estate Owned	94	0.4
Intangible Assets	0	0.0
Other Assets	205	0.8
<b>Total Assets</b>	<b>25,876</b>	<b>100.0</b>

*Source: Report of Income and Condition (12/31/2017).*

As seen in the following table, the mix of outstanding loans as of the December 31, 2017, Report of Income and Condition reflects a relatively similar distribution to that shown for originated loans under the Scope of Evaluation. Residential loans typically are for a longer term than consumer loans; therefore, they represent a large volume of loans outstanding. Specifically, the table shows residential and consumer lending as the major product categories at 56.2 and 32.7 percent, respectively.

Loan Portfolio Distribution		
Loan Category	\$(000s)	%
Secured by Farmland	462	4.6
1-4 Family Residential	5,639	56.2
Commercial Real Estate	471	4.7
<b>Total Real Estate Loans</b>	<b>6,572</b>	<b>65.5</b>
Agricultural	15	0.2
Commercial and Industrial	164	1.6
Consumer	3,277	32.7
<b>Total Loans</b>	<b>10,028</b>	<b>100.0</b>

Source: Report of Income and Condition (12/31/2017).

Examiners did not identify any financial, legal, or other impediments that affect the institution's ability to meet AA credit needs.

### DESCRIPTION OF ASSESSMENT AREA

The CRA requires each financial institution to define one or more AAs within which examiners will evaluate its CRA performance. Citizens Bank & Trust Company delineated two tracts in Carroll County, Tennessee (9623.00 and 9624.00) and two tracts in Gibson County, Tennessee (9664.00 and 9665.00) as the institution's AA. According to the 2015 American Community Survey (ACS), the four census tracts are all located in middle-income geographies. This AA is located in a Non-MSA portion of Tennessee. The institution's AA includes the location of its only office and cash dispensing ATM. The AA conforms to CRA regulatory requirements.

As seen in the following table, Citizens Bank & Trust Company operates one office in its AA, which is located in a distressed, middle-income census tract.

Branch Distribution				
Office Name	Main Office or Branch	Census Tract	Tract Income	Opened or Closed Since Last Examination
<b>Carroll County, TN (47-017)</b>				
Main Office	Main Office	9623.00	Distressed – Middle Income	No
Number of Branches in LMI Income Tracts		0		
Percent of Branches in LMI Income Tracts		0.0%		

Source: Internal Bank Data, 2017 FFIEC Data, and 2015 ACS.

#### Demographic and Economic Data

According to the 2015 ACS, the AA contained a population of 17,356 persons and 7,050 households, of which 22.3 percent reported low-incomes, 17.8 percent reported moderate-incomes, 18.1 percent reported middle-incomes, and 41.8 reported upper-incomes. The 2015 ACS reported that 19.0 percent of households reported incomes below the poverty level. There

are 8,492 housing units. Of these, 60.2 percent are owner-occupied, 22.8 percent are rental units, and 17.0 percent are vacant.

Since the last evaluation, there have been two designated disaster areas in the AA: 2014 Tennessee Severe Winter Storms (DR-4171) in Carroll County and 2014 Tennessee Severe Storms, Tornados, Straight-line Winds, Flooding (DR-4189) in Carroll and Gibson Counties. In addition, 2017 records indicated both Carroll County census tracts received a distressed designation due to poverty levels.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.0	0.0	100.0	0.0	0.0
Population by Geography	17,356	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	8,492	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	5,112	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,938	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	1,442	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	835	0.0	0.0	100.0	0.0	0.0
Farms by Geography	49	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	4,571	19.1	18.8	20.4	41.7	0.0
Household Distribution by Income Level	7,050	22.3	17.8	18.1	41.8	0.0
Median Family Income Non-MSAs – TN (2017)	\$47,900	Median Housing Value				\$87,562
		Median Gross Rent				\$601
		Families Below Poverty Level				13.4%

Source: 2015 ACS Census and 2017 D&B Data; Due to rounding, totals may not equal 100.0.  
 (\*) The NA category consists of geographies that have not been assigned an income classification.

Examiners utilized the 2017 FFIEC-estimated median family income level to analyze residential loans under the Borrower Profile criterion. The following table includes the income categories for Tennessee Non-MSA area.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
TN NA Median Family Income (99999)				
2017 (\$47,900)	<\$23,950	\$23,950 to <\$38,320	\$38,320 to <\$57,480	≥\$57,480

*Source: 2017 FFIEC-estimated Median Family Income.*

Major employers in the area include Public Works Garage (parking area maintenance), Ceco Door Products (door manufacturer), Gibson County Schools (public education), Walmart Supercenter (discount merchant), McKenzie Medical Center (healthcare), and Baptist Memorial Hospital (healthcare).

Data obtained from the U.S. Bureau of Labor Statistics indicates that the unemployment rate as of March 2018, stood at 4.7 percent for Carroll County, Tennessee and 4.3 percent for Gibson County, Tennessee. These rates are higher than both the statewide figure of 3.4 percent and the national average of 4.1 percent. Unemployment rates trended lower the last four years, but remain elevated. Unemployment trends for Carroll and Gibson Counties, the State of Tennessee, and the United States are provided in the below table and illustrate the weakened but improving economy, since the prior evaluation.

Unemployment Rates				
Area	March 2018	March 2017	March 2016	March 2015
Carroll County	4.7	5.5	6.6	9.2
Gibson County	4.3	5.1	5.9	8.2
State of Tennessee	3.4	4.2	4.7	6.0
United States	4.1	4.6	5.1	5.6

*Source: U.S. Bureau of Labor Statistics.*

### Competition

Citizens Bank & Trust Company operates in a competitive banking environment. According to the June 30, 2017, FDIC Summary of Deposits, 13 FDIC-insured financial institutions operated 39 branches in Carroll and Gibson Counties, where Citizens Bank & Trust Company's sole branch is located. The institution holds 1.8 percent of this market share of deposits and ranks 12<sup>th</sup> among all competitors.

### Community Contact

As part of the evaluation process, examiners contact third parties active in the AA to assist in identifying the credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit and community development opportunities are available.

Examiners conducted a community contact to help assess the current economic conditions, community credit needs, and potential opportunities for institution involvement in the AA. The contact categorized the area's economic condition as relatively weak; however, the expansion of

an existing employer (Granges Aluminum) may create approximately 100 additional full-time jobs.

The contact stated due to limited financial capacity of most area resident financial education remains the primary opportunity for institution involvement. In addition, the contact indicated that local banks are meeting the financial education needs, and fulfilling other needs in the community such as bank officers serving on numerous non-profit boards and finance committees; and sponsoring local fundraising events.

#### ***Credit and Community Development Needs and Opportunities***

Citizens Bank & Trust Company's community primarily creates loan demand for consumer and residential mortgage loans. Considering information obtained from the community contact, bank management, and demographic information, examiners ascertained that the primary credit needs of the AA include both consumer and residential mortgage lending.

### **CONCLUSIONS ON PERFORMANCE CRITERIA**

Citizens Bank & Trust Company demonstrated satisfactory performance under the Lending Test. The majority of loans originated inside of the assessment area and the reasonable borrower profile distribution primarily support this conclusion. In addition, the institution achieved a reasonable loan-to-deposit ratio. Examiners considered consumer lending and residential lending; placing greater weight on consumer lending when arriving at overall conclusions and ratings.

#### **Loan-to-Deposit Ratio**

The institution exhibited a reasonable record regarding its loan-to-deposit ratio (LTD). The reasonable overall and comparative performances support this conclusion. Examiners considered the institution's size, business strategy, and capacity relative to the AA credit needs when arriving at this conclusion.

#### ***Overall Level***

The institution demonstrated a reasonable record regarding its LTD ratio. A reasonable average, net ratio over the 21 quarters since the previous evaluation supports this conclusion. The institution's LTD ratio, calculated from Report of Income and Condition data, averaged 42.5 percent. The ratio ranged from a low of 37.2 percent as of March 31, 2017, to a high of 49.3 percent as of June 30, 2013. The ratio has been slowly declining throughout the evaluation period and is reflective of the general economic climate.

Examiners noted that deposits decreased 6.1 percent since the last evaluation, while loans decreased by 23.4 percent over the same period. During this period, the population of the AA declined by nearly 20.6 percent while the percent of families living below the poverty level increased over 34.1 percent. The institution's focus on consumer lending helps to meet the immediate credit needs of low- and moderate-income families. However, this focus has a direct impact on the LTD ratio as consumer credits typically originate in smaller amounts than residential and small business loans, adversely influencing the level of lending measured by this

ratio. Relative to the performance context considerations mentioned, the institution's average, net LTD ratio reflects a reasonable level of lending.

**Comparable Level**

The comparative level of the institution's average, net LTD ratio reflects reasonable performance. Examiners identified and listed in the following table three similarly-situated institutions operating in or near the institution's AA and reflecting similar asset sizes and/or lending emphases.

As shown in the table, the LTD ratios for the similarly-situated institutions ranged from 37.2 percent to 50.4 percent during the same 21 quarters ending December 31, 2017. The institution's ratio reflects performance 5.3 percentage points higher than the lowest ratio listed and 7.9 percentage points lower than the highest ratio (within a reasonable range of both). Therefore, considering the comparative level, the institution's average, net LTD ratio reflects reasonable performance.

<b>LTD Ratio Comparative Level</b>		
<b>Bank Name and Location</b>	<b>Total Assets \$(000s)</b>	<b>Average, Net LTD Ratio (%)</b>
Citizens Bank and Trust Company, Atwood, TN	25,876	42.5
<b>Similarly-Situated Banks</b>		
Bank of Gleason, Gleason, TN	117,048	37.2
McKenzie Banking Company, McKenzie, TN	130,509	50.4
Chester County Bank, Henderson, TN	70,075	44.1

*Source: Reports of Income and Condition (21 quarters through 12/31/17).*

Consequently, given the two measures' relative conclusions and weightings, the institution exhibited a reasonable overall record regarding its LTD ratio.

**Assessment Area Concentration**

Citizens Bank & Trust Company originated a majority of its consumer and residential loans inside the AA. Majorities of consumer and residential lending by number and dollar volume inside the AA support this conclusion. Examiners considered the institution's size and office structure relative to the size of the AA when arriving at this conclusion.

**Consumer Loans**

The institution granted a majority of its consumer loans inside its AA. The following table shows that for consumer loans by the percentages of number and dollar volume, the institution granted majorities inside its AA. Weighing both measures equally, combined they show that the institution granted a majority of its consumer loans inside its AA.

**Residential Loans**

The institution granted a majority of its residential loans inside its AA. The following table shows that for residential loans by the percentages of number and dollar volume, the institution



granted majorities inside its AA. Weighing both measures equally, combined they show that the institution granted a majority of its residential loans inside its AA.

Lending Inside and Outside of the Assessment Area										
Loan Type	Number of Loans					Dollars in Loans (\$000s)				
	Inside		Outside		Total #	Inside		Outside		Total \$
	#	%	#	%		\$	%	\$	%	
Consumer Loans*	26	70.3	11	29.7	37	198	66.2	101	33.8	299
Residential Loans	15	78.9	4	21.1	19	1,135	69.1	507	30.9	1,642

Source: Bank Records (2017) \*Sampled loans.

### **Geographic Distribution**

The institution's AA consists entirely of middle-income geographies; therefore, an analysis of the geographic distribution of lending does not influence the overall analysis or rating of the institution's performance.

### **Borrower Profile**

Citizens Bank & Trust Company displayed a reasonable level of penetration regarding the borrower profile. An excellent distribution for consumer lending hampered by the institution's poor performance regarding residential lending support this conclusion. Examiners considered the loan product types reviewed relative to the available comparative data and any performance context issues when arriving at this conclusion. This review only includes loans originated within the AA.

#### ***Consumer Loans***

Citizens Bank & Trust Company established an excellent penetration among individuals with different income levels, including low- and moderate-income individuals. As illustrated below, the level of lending to low- and moderate-income borrowers exceeds the available demographic data.

For low-income borrowers, the institution's level of lending exceeded the demographic data by over 1.5 times representing excellent penetration. For moderate-income borrowers, the institution's level of consumer lending was nearly double the demographic data of 17.8 percent, also representing excellent penetration. The institution's lending to both of these income groups significantly exceeds the comparable demographic data and represents excellent responsiveness to the credit needs of these customers.

Distribution of Consumer Loans by Borrower Income					
Borrower Income Level	Percent of Total Households	Citizens Bank & Trust Company			
		Consumer Loan Sample			
		#	%	\$(000)s	%
Low	22.3	9	34.6	40	20.4
Moderate	17.8	9	34.6	81	40.8
Middle	18.1	6	23.1	72	36.3
Upper	41.8	2	7.7	5	2.5
<b>Total</b>	<b>100.0</b>	<b>26</b>	<b>100.0</b>	<b>198</b>	<b>100.0</b>

Source: Consumer Loan Sample, 2015 ACS US Census.

### Residential Loans

An analysis of residential loans illustrates that Citizens Bank & Trust Company has a poor penetration among individuals with different income levels, including those with low- or moderate-incomes.

The institution originated no residential loans to low-income borrowers, supporting very poor penetration in comparison to the level of low-income families in the AA. The residential loan sample indicates that the institution originated 5.5 percent less than the percentage of families to moderate-income borrowers, supporting reasonable penetration. The reasonable penetration to moderate-income borrowers did not significantly lift the very poor performance to low-income borrowers, supporting poor performance.

Distribution of Residential Loans by Borrower's Income Level					
Borrower Income Level	Percent of Total Families	Citizens Bank & Trust Company			
		#	%	\$(000)s	%
Low	19.1	0	0.0	0	0.0
Moderate	18.8	2	13.3	153	13.5
Middle	20.4	4	26.7	190	16.7
Upper	41.7	9	60.0	792	69.8
<b>Total</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>	<b>1,135</b>	<b>100.00</b>

Source: Residential Loans, 2015 ACS US Census.

### Response to CRA Complaints

The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

### DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the overall rating.

## 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.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**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.

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**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. Other family 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).

**Family Income:** Includes the income of all members of a family that are age 15 and older.

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower profile, 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 applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Disclosure Loan Application Register (HMDA LAR):** The HMDA LARs record all applications received for residential purchase, refinance, home improvement, and temporary-to-permanent construction loans.

**Home Mortgage Loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multi-family (five or more families) dwelling loans, loans to purchase manufactured homes, and refinancings of home improvement and home purchase loans.

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

**Household Income:** Includes the income of the householder and all other persons that are age 15 and older in the household, whether related to the householder or not. Because many households are only one person, median household income is usually less than median family income.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (for example, geographic distribution, borrower profile, 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 Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**Micropolitan Statistical Area:** CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

**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 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 and less than 80 percent in the case of a geography.

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area:** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

**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.

**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.

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Loan:** A loan included in “loans to small businesses” as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

**Small Farm Loan:** 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

**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.

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.



### Home Mortgage Disclosure Act Notice

The HMDA data about our residential mortgage lending is available online for review. The data shows 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 many other financial institutions is also available online. For more information, visit the Consumer Financial Protection Bureau's Website.

To review this information, visit the link <https://ffiec.cfpb.gov/data-publication/disclosure-reports/> to search by year and Legal Entity Identifier (LEI) or Institution Name.