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Randy Button & Associates Valuation Services

December 19, 2017

Mr. James R. Park
Executive Director
Appraisal Subcommittee
1401 H Street, N.W., Suite 760
Washington, DC 20005

DEC 26 2017

Re: Temporary Waiver Request of TriStar Bank

Dear Mr. Park:

Please allow me to provide some background and concerns related to the above referenced waiver request which was submitted to the Appraisal Subcommittee this month. For the past ten years my firm has provided compliance appraisal review services for over thirty mid-size and community banks in the Nashville MSA and middle Tennessee region. These bank clients rely on our valuation expertise and regulatory competence to meet their quality control needs. Often, we are requested to provide review reports on appraisals submitted by appraisers that would like to be added to the banks approved panel. Many of our clients will also request recommendations for appraisers to add to their panel or to fulfill needs in particular geographic areas. This is a service that we welcome and allows us to help the banks provide better valuation products to ensure safety and soundness.

Our experience in this market has shown that there is no deficiency of either commercial or residential appraisers in the counties named in the waiver request. We find that the delivery of services has not changed over the past five years and fees are actually lower than charged five years ago for similar property types. The appraisers in our market are very competent and provide high quality valuation reports. None of the clients we serve have a problem finding or engaging appraisers to service their lending needs. Our firm has completed almost 50 commercial review assignments in Dickson and Maury Counties for lending clients this year. We have completed over 300 reviews in Davidson and Williamson Counties during the same time period. This is further evidence that we are very involved with the lending community and their valuation needs in our market.

My firm has only received one commercial review request from TriStar Bank in 2017. TriStar is a smaller bank which has a lower volume of loans in comparison to many of our clients. As stated previously, I would be glad to assist TriStar Bank with finding competent appraisers to provide and service their collateral valuation needs.

Thank you for allowing me to make the case for denying this waiver request and I hope that you come to the same conclusion after researching the availability of appraisers in our market area.

Respectively submitted,



Randy Button, MAI, SRA, AI-GRS