

St. Louis Equal Housing and Community Reinvestment Alliance

c/o EHOC · 1027 S. Vandeventer Avenue, 6th floor · St. Louis, MO · 63110 · www.slehcra.org

MEMBER

ORGANIZATIONS

September 30, 2011

Center for the
Acceleration of
African American
Business

Robert J. Carmona
Deputy Regional Director
Federal Deposit Insurance Corporation
1100 Walnut St, Suite 2100
Kansas City, MO 64106

Community Action
Agency of St. Louis
County

RE: Application Number: 20111848

Community Resource
and Development
Organization

Dear Mr. Carmona:

Consumers Council of
Missouri

The St. Louis Equal Housing and Community Reinvestment Alliance (SLEHCRA) would like to offer additional comments on the application of Enterprise Bank & Trust to purchase a branch of BankLiberty, application number 20111848. SLEHCRA provided comments on July 11, 2011 asking the FDIC to delay any action on this application until a fair housing complaint filed against Enterprise Bank & Trust with the U.S. Department of Housing and Urban Development (HUD) was resolved. The Metropolitan St. Louis Equal Housing Opportunity Council, a SLEHCRA member organization, had filed a fair housing complaint against Enterprise Bank & Trust that was under investigation by HUD's Office of Systemic Investigations.

Citizens Coalition to
Fight Eminent
Domain Abuse

Justine Petersen

Lemay Housing
Partnership

We are pleased to inform you that a conciliation agreement has been reached between Enterprise Bank & Trust (the Bank) and the Metropolitan St. Louis Equal Housing Opportunity Council. This agreement was signed and approved on Thursday, September 29, 2011, and fully resolves the complaint against the Bank with HUD. This agreement also allays the concerns of SLEHCRA in regards to the bank's service to low-income and minority communities.

Metropolitan St.
Louis Equal Housing
Opportunity Council

Missourians
Organizing for
Reform and
Empowerment

The terms of the agreement include the following commitments over the next three years:

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1. Enterprise Bank & Trust revised their assessment areas in the St. Louis and Kansas City markets to include all of the City of St. Louis, in Missouri, and all of Wyandotte County, in Kansas.
2. Enterprise Bank & Trust will establish a full-service branch location at their current Administrative Support Center, which is located in a predominately minority census tract.
3. The Bank will maintain the position of Senior Vice-President of Community Development, and will assign Community Development Officers in St. Louis and Kansas City.
4. For each year of the agreement, Enterprise Bank & Trust will spend a minimum of \$50,000 on additional advertising and marketing to African-American and Hispanic communities within St. Louis, for a total commitment of \$150,000. Additional advertising and marketing includes print media, broadcast media, promotional materials, and sponsorships for events in support of African-American or Hispanic communities.
5. The Bank will conduct additional financial literacy classes in the City of St. Louis, Missouri, and in Wyandotte County, Kansas as part of their Enterprise University classes.

NAACP St. Louis

North County
Churches Uniting for
Racial Harmony and
Justice

Ready, Aim,
Advocate! Committee

St. Louis Community
Land Trust

Union Sarah
Community
Corporation

St. Louis Equal Housing and Community Reinvestment Alliance

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6. Enterprise Bank & Trust will commit \$1.5 million in a special financing program for discounted residential mortgage loans to owner-occupied properties in predominately minority census tracts in the bank's market areas. The program will emphasize providing mortgage loans to residents of Low Income Housing Tax Credit properties.
7. The Bank provided \$1 million in support to Central Bank of Kansas City, a minority-owned financial institution in Kansas City metro area that focuses on meeting the needs of disadvantaged communities through education and lending products.
8. Enterprise Bank & Trust will provide \$350,000 to a predevelopment loan fund that provides non profit organizations a source of funds for real estate development projects and the early costs of construction.

The agreement also provides additional commitments for the Bank in the Kansas City market should the Bank enter the residential mortgage market. Enterprise Bank & Trust will open a full-service branch in a predominately minority census tract in the Kansas City market, as well as do additional advertising and marketing in that market, if the Bank begins mortgage lending activities.

As a coalition, we are pleased with these commitments from Enterprise Bank & Trust and the positive impact they will have on the community, particularly the low-income and minority communities. Through this agreement, the Bank is providing additional services, resources, and products for communities that have been underserved by mainstream financial services. We look forward to working with the Bank to implement these commitments and better serve the community. This agreement addresses our concerns expressed in our previous public comment letter regarding Enterprise Bank & Trust, and we ask the FDIC to move forward on the bank's application to purchase the branch of BankLiberty.

Thank you for your consideration.

Sincerely,



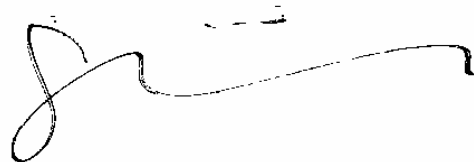
Jacqueline Hutchinson
Consumers Council of Missouri



Will Jordan
Metropolitan St. Louis Equal Housing
Opportunity Council



Adolphus Pruitt
NAACP St. Louis City



Galen Gondolfi
Justine Petersen

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Missourians Organizing for Reform and
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