

St. Louis Equal Housing and Community Reinvestment Alliance

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

Montgomery Bank

- \$904.73 million in assets.
- Intermediate Small Bank, regulated by the OCC
- ‘Satisfactory’ rating on last CRA performance evaluation in March 2007
 - Notes low lending to LMI borrowers, but is reasonable considering the population living under the poverty line and since most of the bank’s lending is to corporations so they do not report income characteristics. Shows a very high number of unreported race and income borrowers in 2005 and 2006.
- Assessment Area: St. Louis County, St. Louis City, St. Charles County, and Jefferson County. In April 2011, expanded AA to include counties in their entirety.
- Based in Sikeston, MO with locations in southeast Missouri and St. Louis.

St. Louis Branch Locations

Address	City	State	Zip	Tract Income Level	% Minority	% Black
11998 St. Charles Rock Rd.	Bridgeton	MO	63044	Middle	17.3	10.52%
13701 Olive Blvd.	Chesterfield	MO	63107	Upper	12.05	3.09%
3808 Union Rd.	St. Louis	MO	63125	Middle	4.19	0.75%
13303 Manchester Rd.	Des Peres	MO	63131	Upper	9.84	1.10%
1229 South Laclede Station Rd.	Webster Groves	MO	63119	Upper	5.27	1.04%

Home Mortgage Disclosure Act (HMDA) analysis

- Low percentage of loans to African-American borrowers – lower than aggregate lending. Only 4.89 percent to African- American borrowers over last four years. Overall decrease in lending over last four years, but decrease felt more sharply in loans to minority borrowers.
- Denial rate disparity between African-American borrowers and white borrowers – over last four years 21.54 percent of black applications were denied, compared with only 6.59 percent of white applications. Blacks are 3.27 times more likely to be denied.
- Low percentage of loans to low- and moderate- income borrowers, below the aggregate percentages. Lending to low-income borrowers has decreased dramatically over last four years. Over half of loans originated in 2010 went to upper-income borrowers.
- Lending to minority geographies is below aggregate lending, and has decreased since 2008.
- Lending to low- and moderate-income geographies is similar to aggregate percentages, but originations to moderate-income geographies have decreased dramatically in the last three years.

APPLICATIONS

Borrower Characteristics	2010		2009		2008		2007		2007-2009 Total		St. Louis MSA (07-09)
	#	%	#	%	#	%	#	%	#	%	
Total	261		297		309		157		763		
White	222	85.06%	261	87.88%	206	66.67%	115	73.25%	582	76.28%	72.21%
Black	17	6.51%	19	6.40%	29	9.39%	0	0.00%	48	6.29%	11.65%
Asian	3	1.15%	4	1.35%	2	0.65%	1	0.64%	7	0.92%	1.42%
Other	19	7.28%	13	4.38%	72	23.30%	41	26.11%	126	16.51%	14.72%
Hispanic	2	0.77%	8	2.69%	3	0.97%	4	2.55%	15	1.97%	0.98%

Note: Application count does not include loans reported as purchased by the institution.

ORIGINATIONS

<i>Borrower Characteristics</i>		2010		2009		2008		2007		2007-2009 Total		St. Louis MSA (07-09)
<i>Race/Ethnicity</i>		#	%	#	%	#	%	#	%	#	%	%
Total		210		247		260		142		649		
	White	184	87.62%	222	89.88%	176	67.69%	102	71.83%	500	77.04%	78.96%
	Black	9	4.29%	12	4.86%	21	8.08%	0	0.00%	33	5.08%	7.17%
	Asian	3	1.43%	4	1.62%	2	0.77%	1	0.70%	7	1.08%	1.46%
	Other	14	6.67%	9	3.64%	61	23.46%	39	27.46%	109	16.80%	12.42%
	Hispanic	1	0.48%	6	2.43%	2	0.77%	4	2.82%	12	1.85%	0.84%

DENIALS AND DENIAL RATE

<i>Borrower Characteristics</i>		2010		2009		2008		2007		Total	
<i>Race/Ethnicity</i>		#	Denial rate	#	Denial rate	#	Denial rate	#	Denial rate	#	Denial rate
Total		31	11.88%	19	6.40%	19	6.15%	6	3.82%	75	7.32%
	White	22	9.91%	15	5.75%	10	4.85%	6	5.22%	53	6.59%
	Black	7	41.18%	2	10.53%	5	17.24%	0	0.00%	14	21.54%
	Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Other	2	10.53%	2	15.38%	4	5.56%	0	0.00%	8	5.52%
	Hispanic	1	50.00%	0	0.00%	0	0.00%	0	0.00%	1	5.88%

ORIGINATIONS

<i>Borrower Characteristics</i>		2010		2009		2008		2007		2007-2009 Total		St. Louis MSA (07-09)
<i>Income Level</i>		#	%	#	%	#	%	#	%	#	%	%
Total		210		247		260		142		649		
	Low	7	3.33%	11	4.45%	19	7.31%	8	5.63%	38	5.86%	8.67%
	Moderate	35	16.67%	48	19.43%	37	14.23%	16	11.27%	101	15.56%	20.41%
	Middle	36	17.14%	55	22.27%	45	17.31%	23	16.20%	123	18.95%	23.96%
	Upper	109	51.90%	100	40.49%	97	37.31%	55	38.73%	252	38.83%	38.46%
	NA	23	10.95%	33	13.36%	62	23.85%	40	28.17%	135	20.80%	8.50%

ORIGINATIONS

<i>Census tract characteristics</i>		2009		2008		2007		2007-2009 Total		St. Louis MSA (07-09)
<i>racial composition</i>		#	%	#	%	#	%	#	%	%
	< 10% Minority	177	71.66%	162	62.31%	97	68.31%	436	67.18%	63.45%
	10-19% Minority	29	11.74%	20	7.69%	17	11.97%	66	10.17%	13.33%
	20-49% Minority	29	11.74%	56	21.54%	22	15.49%	107	16.49%	11.13%
	50-79% Minority	9	3.64%	13	5.00%	6	4.23%	28	4.31%	4.27%
	80-100% Minority	3	1.21%	9	3.46%	0	0.00%	12	1.85%	3.35%
Income characteristic										
	Low	4	1.62%	10	3.85%	3	2.11%	17	2.62%	1.66%
	Moderate	21	8.50%	32	12.31%	22	15.49%	75	11.56%	12.85%
	Middle	111	44.94%	105	40.38%	72	50.70%	288	44.38%	49.96%
	Upper	111	44.94%	113	43.46%	45	31.69%	269	41.45%	31.01%
	NA	0	0.00%	0	0.00%	0	0.00%	0	0.00%	4.51%
TOTAL		247		260		142		649		

Note: 2010 HMDA data not available yet for census characteristics