

**St. Louis Equal Housing and Community Reinvestment Alliance**  
 c/o EHOC • 1027 S. Vandeventer Avenue, 6<sup>th</sup> floor • St. Louis, MO • 63110 • www.slehkra.org

**Regions Bank**

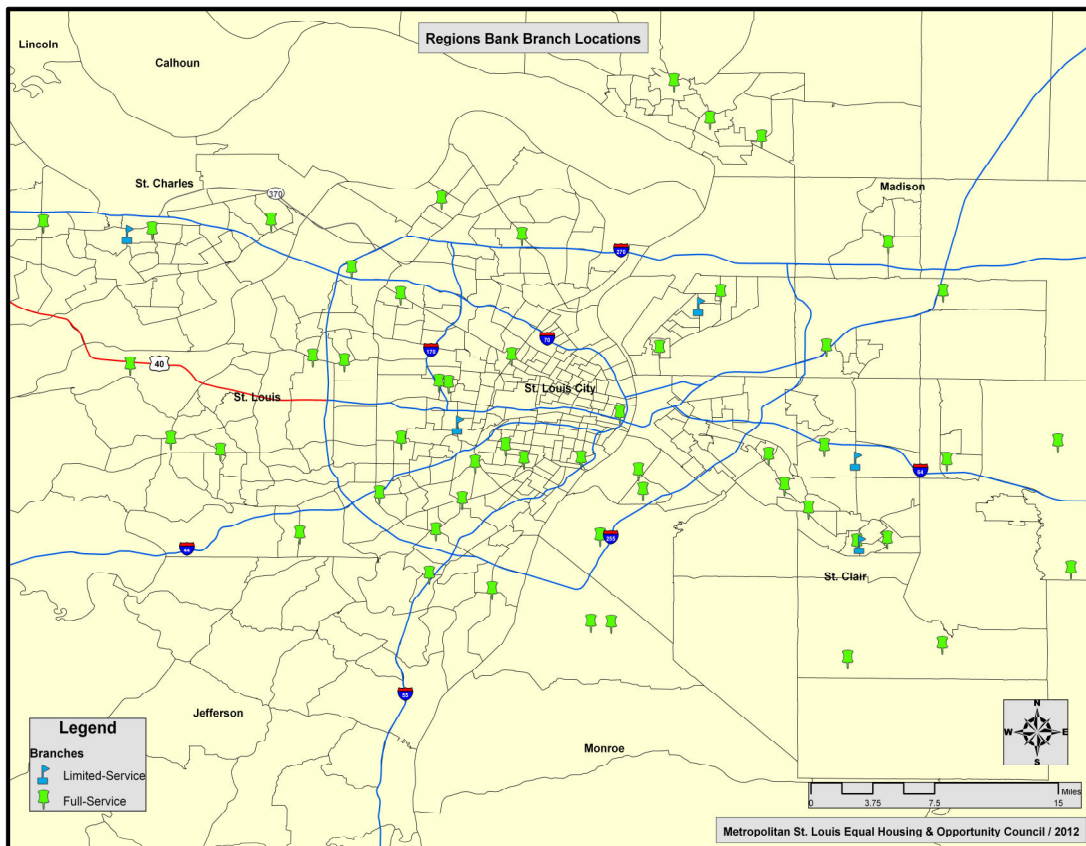
- \$124.7 billion in assets.
- Headquarters in Birmingham, AL.
- Owned by Regions Financial Corporation
- Regulated by the Federal Reserve Board
- Assessment Area: St. Charles, St. Louis, St. Louis City, in MO, and Clinton, Madison, Monroe, St. Clair County in IL.
- Ranks 5<sup>th</sup> in deposits in the St. Louis MSA, with 4.14% of deposit market share.
- One of top ten mortgage lenders in St. Louis MSA.
- ‘Satisfactory’ on last CRA exam in 2010. Notes ‘Low Satisfactory’ on service test.

**Branch Locations**

Regions Bank operates 70 branches in St. Louis MSA.

Branch Locations by Income Level		
Total	70	%
Low-Income	3	4.3%
Moderate-Income	15	21.4%
Middle-Income	33	47.1%
Upper-Income	18	25.7%

Branch Locations by Minority Population		
Total	70	%
Under 10% Minority	23	32.86%
10 - 19% Minority	20	28.57%
20 - 49% Minority	17	24.29%
50 - 79% Minority	4	5.71%
80% and above Minority	6	8.57%



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### **Products and Services**

- Recently launched Regions' NOW Banking suite of products to bring non-traditional banking customers into mainstream banking. Includes low-cost check cashing, re-loadable prepaid card, money transfers and bill pay through Western Union.
- Regions Ready Advance: short-term, revolving line of credit product that takes payments out of direct deposit. Credit limit of \$50 - \$500, with a fee of 10% of advance funds. Repayment options of base model, with all of balance repaid on customers next direct deposit, or installment model, with a 21% APR on all outstanding balances. Customers must have had Regions checking account for 9 months, and cannot use the product for more than 6 consecutive months.
- Affordable Mortgage Products:
  - Regions Affordable 97% FRM – designed to meet the needs of low-to-moderate income borrowers
    - Eligible Borrowers – (1) First Time Homebuyers; (2) Low to Moderate Income (LMI) Borrowers; and (3) Borrower may not have any ownership interest in any other residential property at the time of closing
    - 30-year Fixed Rate Mortgage
    - Borrower Contribution – 3% of Sales Price
    - Mortgage Insurance is not required
  - Regions Affordable 100% Program – a portfolio that allows 100% financing without mortgage insurance for LMI homebuyers or borrowers purchasing in a low-to-moderate income (LMI) census tract who do not currently own a home
- Provides in-house Customer Assistance Program for homeowners to stay in their homes. Also works with Making Home Affordable Program. Regions has set a goal in 2012 to provide more than \$1 billion of relief to homeowners through the Federal Housing and Finance Administrations' Home Affordable Refinance Program (HARP)

### **Home Mortgage Disclosure Act**

Limited to St. Louis Metropolitan Area, compared with aggregate lending in Regions Bank's St. Louis Assessment Area ("peer").

- Decrease in lending since 2009. Lending in 2011 is lowest overall, with 958 originations.
- Lending to African-Americans is increasing now in applications and originations following a drop in 2009, but still below the aggregate levels.
  - In 2011, 8.71 percent of applications were from African-Americans. In 2010, 5.68 percent of applications were from African-Americans. Comparatively, the aggregate reported 6.73 percent of applications in 2010.
  - 5.01% of loans originated to African-American borrowers in 2011, which is an increase since 2009. In 2010, 3.54 percent originated to African-American borrowers, which is lower than the aggregate lending at 4.52 percent to black borrowers.
- Significant disparities in denial rates between African-American and white borrowers. In 2011, African-American borrowers were denied 3.26 times more than white borrowers. 51.37 percent of black applicants were denied compared to only 15.71 percent of white applications denied. Disparity is significant among all lending years.
- Lending to minority communities is slightly below aggregate lending.

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- In 2010, 3.08 percent of originations were in predominately minority census tracts, compared to 4.45 percent in aggregate lending. In 2009, 3.53 percent originated to predominately minority census tracts, compared to aggregate lending at 5.51 percent.
- Lending to low- and moderate-income borrowers has been increasing and is above the aggregate level of lending.
  - In 2011, 13.36 percent originated to low-income borrowers and 19.83 percent originated to moderate-income borrowers. In 2010, 10.22 percent originated to low-income borrowers and 17.75 percent originated to moderate-income borrowers. Comparatively, the aggregate originated 6.21 percent and 13.08 percent to low-income and moderate-income borrowers, respectively.
- Lending to low- and moderate-income communities is similar to aggregate lending.
  - In 2010, 0.52 percent of loans originated to low-income communities and 10.67 percent originated to moderate-income communities. The aggregate lending originated 0.84 percent to low-income census tracts and 7.91 percent to moderate-income census tracts. In 2009, Regions originated 0.97 percent to low-income and 8.17 percent to moderate-income, compared to the aggregate originations at 0.98 percent to low-income borrowers and 9.24 percent moderate-income borrowers.

<b>APPLICATIONS</b>												
	<b>2011</b>			<b>2010</b>			<b>2009</b>			<b>2008</b>		
<b>race/ethnicity</b>	<b>#</b>	<b>%</b>	<b>Peer</b>	<b>#</b>	<b>%</b>	<b>Peer</b>	<b>#</b>	<b>%</b>	<b>Peer</b>	<b>#</b>	<b>%</b>	<b>Peer</b>
Total	<b>1676</b>			<b>2446</b>			<b>3258</b>			<b>2520</b>		
White	1330	79.36%	NA	2153	88.02%	79.33%	2785	85.48%	77.09%	1852	73.49%	68.22%
Black	146	8.71%	NA	139	5.68%	6.73%	180	5.52%	8.27%	203	8.06%	15.04%
Asian	44	2.63%	NA	49	2.00%	2.33%	68	2.09%	2.14%	30	1.19%	1.81%
Other	156	9.31%	NA	105	4.29%	11.61%	225	6.91%	12.49%	435	17.26%	14.93%
Hispanic	18	1.07%	NA	24	0.98%	1.26%	18	0.55%	1.27%	23	0.91%	1.39%

<b>ORIGINATIONS</b>												
	<b>2011</b>			<b>2010</b>			<b>2009</b>			<b>2008</b>		
<b>race/ethnicity</b>	<b>#</b>	<b>%</b>	<b>Peer</b>	<b>#</b>	<b>%</b>	<b>Peer</b>	<b>#</b>	<b>%</b>	<b>Peer</b>	<b>#</b>	<b>%</b>	<b>Peer</b>
Total	<b>958</b>			<b>1527</b>			<b>2069</b>			<b>1163</b>		
White	832	86.85%	NA	1408	92.21%	84.01%	1846	89.22%	81.82%	935	80.40%	75.64%
Black	48	5.01%	NA	54	3.54%	4.52%	78	3.77%	5.61%	59	5.07%	8.84%
Asian	12	1.25%	NA	21	1.38%	2.34%	38	1.84%	2.11%	17	1.46%	1.85%
Other	66	6.89%	NA	44	2.88%	9.12%	107	5.17%	10.46%	152	13.07%	13.66%
Hispanic	10	1.04%	NA	16	1.05%	1.13%	13	0.63%	2.77%	11	0.95%	1.24%

<b>DENIAL RATE</b>				
	<b>2011</b>	<b>2010</b>	<b>2009</b>	<b>2008</b>
<b>Race/ethnicity</b>	<b>%</b>	<b>%</b>	<b>%</b>	<b>%</b>
Total	20.41%	13.25%	8.87%	20.16%
White	15.71%	10.50%	6.68%	14.69%
Black	51.37%	42.45%	27.78%	41.87%
Asian	11.36%	12.24%	10.29%	10.00%
Other	33.97%	31.43%	20.44%	34.02%
Hispanic	16.67%	12.50%	11.11%	26.09%

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ORIGINATIONS												
	2011			2010			2009			2008		
Income Level	#	%	Peer	#	%	Peer	#	%	Peer	#	%	Peer
Total	<b>958</b>			<b>1527</b>			<b>2069</b>			<b>1163</b>		
Low-Income	128	13.36%	NA	156	10.22%	6.21%	143	6.91%	7.50%	114	9.80%	23.11%
Moderate-Income	190	19.83%	NA	271	17.75%	13.08%	368	17.79%	18.28%	209	17.97%	15.73%
Middle-Income	222	23.17%	NA	379	24.82%	25.68%	437	21.12%	21.52%	286	24.59%	18.19%
Upper-Income	403	42.07%	NA	694	45.45%	48.60%	808	39.05%	41.37%	402	34.57%	34.36%
NA	15	1.57%	NA	27	1.77%	6.43%	313	15.13%	11.34%	152	13.07%	8.62%

ORIGINATIONS										
	2010			2009			2008			
Minority composition	#	%	Peer	#	%	Peer	#	%	Peer	
Total	<b>1527</b>			<b>2069</b>			<b>1163</b>			
< 10% Minority	995	65.16%	67.37%	1360	65.73%	65.70%	712	61.22%	59.16%	
10-19% Minority	296	19.38%	17.22%	406	19.62%	16.86%	238	20.46%	16.60%	
20-49% Minority	189	12.38%	10.95%	230	11.12%	11.86%	146	12.55%	14.38%	
50-79% Minority	38	2.49%	2.98%	54	2.61%	3.68%	40	3.44%	5.54%	
80-100% Minority	9	0.59%	1.47%	19	0.92%	1.83%	27	2.32%	4.30%	

ORIGINATIONS									
	2010			2009			2008		
Income Designation	#	%	Peer	#	%	Peer	#	%	Peer
Total	<b>1527</b>			<b>2069</b>			<b>1163</b>		
Low-Income	8	0.52%	0.84%	20	0.97%	0.98%	24	2.06%	2.08%
Moderate-Income	163	10.67%	7.91%	169	8.17%	9.24%	171	14.70%	14.58%
Middle-Income	872	57.11%	42.69%	1176	56.84%	44.12%	666	57.27%	45.58%
Upper-Income	484	31.70%	48.54%	703	33.98%	45.57%	302	25.97%	37.71%
NA	0	0.00%	0.03%	1	0.05%	0.09%	0	0.00%	0.05%

HIGH COST LOANS									
borrower characteristics	2011		2010		2009		2008		
race/ethnicity	#	%	#	%	#	%	#	%	
Total	<b>59</b>	<b>6.16%</b>	<b>13</b>	<b>0.53%</b>	<b>39</b>	<b>1.20%</b>	<b>101</b>	<b>4.01%</b>	
White	38	4.57%	10	0.71%	30	1.63%	78	8.34%	
Black	3	6.25%	0	0.00%	1	1.28%	12	20.34%	
Asian	0	0.00%	0	0.00%	1	2.63%	1	5.88%	
Other	18	27.27%	3	6.82%	7	6.54%	10	6.58%	
Hispanic	1	10.00%	1	6.25%	0	0.00%	1	9.09%	