

## Reliance Bank

- Assets of nearly \$1.2 billion
- Owned by Reliance Bancshares, of Frontenac, MO. Holding company also owns Reliance Bank of Fort Myers, FL, a separately chartered savings institution.
- 20 branch locations in St. Louis metro, and 2 in Ft. Meyers, FL.
- Reliance Bancshares accepted \$40 million in TARP funds in February 2009.
- SLEHCRA submitted public comment in October 2009 regarding the bank's CRA performance evaluation.

## Concerns:

1. Branch locations all in predominately white communities.
2. Previous exclusion of St. Louis from Assessment Area, creating the appearance of a donut hole.
3. Extremely low numbers of applications and originations to African-Americans in the past five years.
4. Denial rate disparity between white applicants and African-American applicants over the last five years.
5. Disparate treatment of African-American borrowers as seen in mortgage lending test.
6. Failure to affirmatively further fair housing with the acceptance of federal funds through the TARP program in February 2009.

## Assessment Area:

St. Louis City; St. Louis County; portions of St. Charles and Jefferson Counties in Missouri; and, St. Clair County and portions of Madison and Monroe Counties in Illinois

Previously, the bank's assessment area excluded the City of St. Louis while including all areas surrounding the City. They also expanded to include all of St. Clair County and Madison County.

## Branch Locations:

Branch	Address	City, State Zip	Census Tract	Income Level	% Minority	% Black
O'Fallon, IL	1575 North Green Mount	O'Fallon, IL 62269	5034.05	Middle	21.38	14.5
Edwardsville	1254 University Drive	Edwardsville, IL 62025	4030.01	Upper	14.24	9.4
Godfrey, IL	2810 Godfrey Road	Godfrey, IL 62035	4027.21	Middle	6.26	3.2
Columbia, IL	180 Admiral Trost Rd.	Columbia, IL 62236	6001	Upper	1.93	0.1
North County	1001 Howdershell Road	Florissant, MO 63031	2113.02	Middle	14.86	10.7
St. Peters	6100 Mexico Road	St. Peters, MO, 63376	3114.01	Moderate	7.08	2.2
O'Fallon, MO	2455 Highway K	O'Fallon, MO, 63368	3117.32	Upper	6.22	2.4
Wentzville	985 Wentzville Parkway	Wentzville, MO, 63385	3120.93	Upper	3.7	1.2
Chesterfield	17263 Wild Horse Creek Rd	Chesterfield, MO 63005	2216.01	Upper	9.68	1.7
Wildwood	2675 Westglen Farms Drive	Wildwood, MO 63011	2216.25	Upper	6.67	1.9
Frontenac	10401 Clayton Rd.	Frontenac, MO 63131	2153.02	Upper	8.38	2.1
Manchester	611 Big Bend Road	Manchester, MO 63021	2179.41	Upper	7.29	2.6
Creve Coeur West	13033 Olive Boulevard	St. Louis, MO, 63141	2151.41	Upper	10.95	3.7
Fenton	1000 South Highway Drive	Fenton, MO 63026	2214.01	Upper	3.41	0.6
Des Peres	11781 Manchester Road	Des Peres, MO, 63131	2176	Upper	4.37	0.4
Creve Coeur	9769 Olive Blvd	Creve Coeur, MO, 63132	2156	Middle	57.97	47.1
Clayton	30 N Brentwood Boulevard	Clayton, MO, 63105	2165	Upper	26.11	20.6
Concord Village	5401 S. Lindbergh Blvd	St. Louis, Mo, 63123	2212.02	Upper	3.45	0.4
Webster Groves	8083 Watson Road	Webster Groves, MO, 63119	2195	Upper	5.27	1
Oakville	5739 Telegraph Road	St. Louis, MO 63129	2204.21	Upper	2.57	0.2
Fort Myers, FL	14241 Metro Parkway	Fort Myers, FL 33912	12.02	Upper	8.23	2.1
Lehigh Acres, FL	2499 Lee Boulevard	Lehigh Acres, FL 33971	403.04	Moderate	28.02	6.2

## HMDA

				APPLICATIONS											
		Five Year Totals		2009		2008		2007		2006		2005			
				#	%	#	%	#	%	#	%	#	%		
<b>Total</b>		1087		284		313		252		125		113			
race/ethnicity															
	White	743	68.35%	265	93.31%	217	69.33%	155	61.51%	49	39.20%	57	50.44%		
	Black	24	2.21%	2	0.70%	10	3.19%	5	1.98%	1	0.80%	6	5.31%		
	Asian	13	1.20%	4	1.41%	6	1.92%	2	0.79%	1	0.80%	0	0.00%		
	Other	307	28.24%	13	4.58%	80	25.56%	90	35.71%	74	59.20%	50	44.25%		
	Hispanic	5	0.46%	1	0.35%	2	0.64%	2	0.79%	0	0.00%	0	0.00%		

				ORIGINATIONS											
		Five Year Totals		2009		2008		2007		2006		2005			
				#	%	#	%	#	%	#	%	#	%		
<b>Total</b>		753		164		176		198		117		98			
race/ethnicity															
	White	482	64.01%	154	93.90%	123	69.89%	114	57.58%	44	37.61%	47	47.96%		
	Black	8	1.06%	0	0.00%	1	0.57%	2	1.01%	1	0.85%	4	4.08%		
	Asian	7	0.93%	2	1.22%	2	1.14%	2	1.01%	1	0.85%	0	0.00%		
	Other	256	34.00%	8	4.88%	50	28.41%	80	40.40%	71	60.68%	47	47.96%		
	Hispanic	2	0.27%	0	0.00%	1	0.57%	1	0.51%	0	0.00%	0	0.00%		

				DENIALS and DENIAL RATE													
		Five Year Totals		2009		2008		2007		2006		2005					
				#	Denial rate	#	Denial rate	#	Denial rate	#	Denial rate	#	Denial rate				
<b>Total</b>		125	11.50%	37	13.03%	58	18.53%	21	8.33%	3	2.40%	6	5.31%				
race/ethnicity																	
	White	85	11.44%	31	11.70%	33	15.21%	16	10.32%	2	4.08%	3	5.26%				
	Black	11	45.83%	1	50.00%	6	60.00%	2	40.00%	0	0.00%	2	33.33%				
	Asian	4	30.77%	2	50.00%	2	33.33%	0	0.00%	0	0.00%	0	0				
	Other	25	8.14%	3	23.08%	17	21.25%	3	3.33%	1	1.35%	1	2.00%				
	Hispanic	1	20.00%	0	0.00%	1	50.00%	0	0.00%	0	0	0	0				

ORIGINATIONS	Five Year Totals		2009		2008		2007		2006		2005	
<i>Borrower Income Characteristics</i>	#	%	#	%	#	%	#	%	#	%	#	%
Low	53	4.88%	18	6.34%	19	6.07%	8	3.17%	4	3.20%	4	3.54%
Moderate	110	10.12%	41	14.44%	36	11.50%	21	8.33%	7	5.60%	5	4.42%
Middle	147	13.52%	48	16.90%	58	18.53%	30	11.90%	8	6.40%	3	2.65%
Upper	433	39.83%	154	54.23%	117	37.38%	101	40.08%	25	20.00%	36	31.86%
NA	344	31.65%	23	8.10%	83	26.52%	92	36.51%	81	64.80%	65	57.52%