

St. Louis Equal Housing and Community Reinvestment Alliance

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WestBridge Bank and Trust Co., Chesterfield, MO

The bank is currently owned by Boulevard Bancshares.

CRA performance evaluation in December 2007 – Satisfactory

- Small Bank evaluation
- Assessment Area is all of St. Louis County
- Considered loan data from January 2007 to October 2007
- Mostly commercial loans (80% of all loans), with residential loans at 20%
- 56% of 2007 HMDA loans and 29% of Small Business Loans were originated outside of AA, but is explained by the selling of loans on the secondary market to loan originators throughout the MSA.
- Low percentages of loans to low- and moderate- income areas and borrowers, but is explained by the location not being in close proximity to low- and moderate-income areas, and by the difficulty for low-income borrowers to purchase and maintain a home.
 - Small Business Loans – 8% to low-income areas, 4% to moderate-income areas.
 - HMDA – 0% to low-income borrowers, 13% to moderate-income borrowers, and 2% to low-income areas, 7% to moderate-income areas.

FDIC issued a **cease and desist order** on January 23, 2009 for unsafe and unsound banking practices and violations of the law and regulations:

The FDIC alleges that WestBridge’s management has “detrimental” lending practices that jeopardize the safety of its deposits and that its board of directors has failed to supervise the bank’s managers, according to the order dated Monday.

The bank engages in “hazardous credit underwriting” practices, including making extensions of credit without adequate risk diversification; failing to adequately identify the extent of risk in existing loans; operating without an effective loan review program; and operating with excessive loan losses, the FDIC said.

WestBridge has also violated the legal lending limit restrictions allowed under state law, the order says.

“FDIC issues order against WestBridge Bank” [St. Louis Business Journal](http://stlouis.bizjournals.com/stlouis/stories/2009/02/23/daily97.html), Feb. 27, 2009.
<http://stlouis.bizjournals.com/stlouis/stories/2009/02/23/daily97.html>

Changes:

- hired a consultant that became the President, Rick Hummel.
- sold foreclosed real estate
- grew deposits and shrank loans.

HMDA

Total Number of Originations:

39 in 2008

125 in 2007

Data from **2007-2008**

Originations by Race and Ethnicity of Borrowers

	Total	White	Black	Hispanic	Asian	Other
Number of Originations	164	100	3	1	6	55
Percent of Originations	100%	60.98%	1.83%	0.61%	3.66%	33.54%
St. Louis Aggregate	100%	75.31%	10.26%	0.98%	1.35%	13.09%

Money Lent by Race and Ethnicity of Borrower

	Total	White	Black	Hispanic	Asian	Other
Amount of Money Lent (in \$000s)	\$37,515	\$18,439	\$690	\$148	\$2,086	\$16,300
Percentage of Money Lent	100%	49.15%	1.84%	0.39%	5.56%	43.45%
St. Louis Aggregate	100%	75.06%	7.58%	0.86%	1.76%	15.6%

Denial Rate by Race and Ethnicity of Borrower

	Total	White	Black	Hispanic	Asian	Other
Denial Rate	6.13%	6.43%	40.00%	0%	0%	1.35%
St. Louis Aggregate	24.42%	20.19%	39.54%	28.75%	19.94%	27.79%

Income**Originations by Income of Borrowers**

	Total	Low-Income	Moderate-Income	Middle-Income	Upper-Income	Not Available
Number of Originations	164	3	18	29	65	49
Percent of Originations	100%	1.83%	10.98%	17.68%	39.63%	29.88%
St. Louis Aggregate		9.93%	22.30%	25.40%	36.06%	6.31%

Money Lent by Income of Borrowers

	Total	Low-Income	Moderate-Income	Middle-Income	Upper-Income	Not Available
Amount of Money Lent (in \$000s)	\$37,515	\$309	\$2,361	\$2,937	\$16,434	\$15,474
Percent of Money Lent	100%	0.82%	6.29%	7.83%	43.81%	41.25%
St. Louis Aggregate	100%	5.21%	15.64%	21.79%	48.06%	9.29%