

**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.slehcra.org

**Bank of Belleville**

720 W. Main Street, Suite 100  
 Belleville, IL 62220

- Assets of \$70,000,000
- Regulated by the FDIC Chicago office as a small bank.
- Originally started and owned by Capitol Bancorp, of Lansing, MI, a ‘bank development company.’ In April 2010, the bank’s ownership was sold to a group of local investors.
- One-to-four family residential loans are 18.9% of all lending. Commercial real estate lending is 39.1% of all loans.
- Pictures on website of board of directors and staff, which are all white.
- CRA examination in October 2007, received a Satisfactory rating, which was their first.
  - Did not evaluate HMDA loans in last examination.
  - In evaluation of commercial loans, there were no loans originated to low-income census tracts but still considered reasonable.
  - Notes that the low- and moderate-income census tracts within assessment area are located in extreme northwest of county, and states that they are approximately 30 miles from the bank office.
  - States the bank’s office is located in middle-income census tract, when it’s actually located in a moderate-income census tract, according to the FFIEC census information.
- Assessment Area: all of St. Clair County.
- One branch located in Belleville

<b>Bank</b>	<b>Address</b>	<b>City, State</b>	<b>Zip</b>	<b>Census Tract</b>	<b>Income Designation</b>	<b>% Minority</b>
Bank of Belleville	720 W. Main St.	Belleville, IL	62220	5016.03	Moderate	22.35

**HMDA data**

- No HMDA report prior to 2008.
- Over 40% of borrowers did not report race or income characteristics, meaning those loans were originated to businesses.
- Only one application by African American borrower, in 2008, which was denied.
- Two loans were originated to Hispanic borrowers, representing 3.33%.
- Only two loans originated to low or moderate- income borrowers in last two years, representing 3.33% of all loans.
- 5% of loans originated to low-income census tracts, and 23.33% originated to moderate-income tracts.
- Most loans originated in St. Clair County.

**Originations by Race and Ethnicity of Borrower**

<i>borrower characteristics</i>	<b>2009</b>		<b>2008</b>		<b>Two Year Total</b>		<b>St. Clair Aggregate (2008-2009)</b>
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	
<b>Total</b>	<b>25</b>		<b>35</b>		<b>60</b>		
<b>White</b>	16	64.00%	18	51.43%	34	56.67%	78.10%

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<b>Black</b>	0	0.00%	0	0.00%	0	0.00%	9.43%
<b>Asian</b>	0	0.00%	0	0.00%	0	0.00%	0.92%
<b>Other</b>	9	36.00%	17	48.57%	26	43.33%	11.54%
<b>Hispanic</b>	1	4.00%	1	2.86%	2	3.33%	1.49%

**Originations by Income Characteristics of Borrower**

Borrower Characteristics	2009		2008		Two Year Total		St. Clair Aggregate (2008-2009)
	#	%	#	%	#	%	
<b>Total</b>	<b>25</b>		<b>35</b>		<b>60</b>		
<b>Low – Income</b>	0	0.00%	1	2.86%	1	1.67%	7.96%
<b>Moderate – Income</b>	0	0.00%	1	2.86%	1	1.67%	16.87%
<b>Middle – Income</b>	1	4.00%	0	0.00%	1	1.67%	23.36%
<b>Upper – Income</b>	14	56.00%	15	42.86%	29	48.33%	36.11%
<b>NA</b>	10	40.00%	18	51.43%	28	46.67%	15.70%

**Originations by Race and Income Characteristics of Property Location**

Census tract characteristics	2009		2008		Two Year Total		St. Clair Aggregate (2008-2009)
	#	%	#	%	#	%	
<b>Total</b>	<b>25</b>		<b>35</b>		<b>60</b>		
<b>racial composition</b>							
< 10% Minority	4	16.00%	0	0.00%	4	6.67%	34.05%
10-19% Minority	10	40.00%	15	42.86%	25	41.67%	33.45%
20-49% Minority	8	32.00%	18	51.43%	26	43.33%	29.48%
50-79% Minority	1	4.00%	1	2.86%	2	3.33%	1.31%
80-100% Minority	2	8.00%	1	2.86%	3	5.00%	1.55%
<b>Income characteristic</b>							
<b>Low</b>	2	8.00%	1	2.86%	3	5.00%	1.13%
<b>Moderate</b>	6	24.00%	8	22.86%	14	23.33%	9.01%
<b>Middle</b>	13	52.00%	21	60.00%	34	56.67%	73.41%
<b>Upper</b>	4	16.00%	5	14.29%	9	15.00%	16.29%
<b>NA</b>	0	0.00%	0	0.00%	0	0.00%	0.16%

Demographics of Assessment Area: St. Clair County

Race/Ethnicity	Percent of Population	
From 2000 Census	White	67.9%
	Black	28.8%
	Asian	0.9%
	Hispanic	2.2%

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<b>Families by Income Level</b>		<b>Percent of Population</b>	
From previous CRA exam information	Low-Income	25.4%	
	Moderate-Income	19.3%	
	Middle-Income	22.8%	
	Upper-Income	32.4%	
	Families Below Poverty	13.4%	
<b>Census Tracts</b>	Total	55	
	Low-Income	11	20%
	Moderate-Income	14	25%
	Middle- Income	25	45%
	Upper-Income	5	9%