

St. Louis Equal Housing and Community Reinvestment Alliance

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

MEMBER ORGANIZATIONS

December 15, 2010

Center for the
Acceleration of
African American
Business

Lawrence R. Jackson
Deputy Regional Director
Federal Deposit Insurance Corporation
300 South Riverside Plaza
Chicago, IL 60606-3447

Community Action
Agency of St. Louis
County

Re: CRA evaluation of Bank of Belleville, Belleville, IL

Citizens Coalition to
Fight Eminent
Domain Abuse

Dear Mr. Jackson:

Human Development
Corporation

The St. Louis Equal Housing and Community Reinvestment Alliance (SLEHCRA) would like to offer public comments regarding the Bank of Belleville, pursuant to the Community Reinvestment Act (CRA) and the bank's performance evaluation scheduled for the present quarter. SLEHCRA is a coalition working in the St. Louis metropolitan area to increase investment to low-income and minority communities by ensuring that banks are meeting their obligations under the Community Reinvestment Act and fair lending laws. We have some concerns with Bank of Belleville and their service to low-income and minority communities, and we urge the FDIC to consider our concerns in the bank's CRA evaluation.

Justine Petersen

Lemay Housing
Partnership

Metropolitan St.
Louis Equal Housing
Opportunity Council

We are concerned that the Bank of Belleville is not adequately serving low- and moderate-income borrowers and communities. According to the Home Mortgage Disclosure Act (HMDA) data, only two loans were originated to low- and moderate-income borrowers over the last two years, representing only 3.33 percent of the banks total home mortgage lending in 2008 and 2009. In comparison, the aggregate lending within St. Clair County, the bank's assessment area, originated 24.83 percent of mortgage loans to low- and moderate-income borrowers in 2008 and 2009.

Missourians
Organizing for
Reform and
Empowerment

MoKan

NAACP St. Louis

The bank has designated all of St. Clair County as their assessment area. According to demographics provided in the bank's last CRA performance evaluation, the population within the county includes 25.4 percent low-income families and 19.3 percent moderate-income families. Additionally, the bank's only office is located in a moderate-income census tract, which should give it ample opportunity to reach LMI communities.

North County
Churches Uniting for
Racial Harmony and
Justice

Ready, Aim,
Advocate! Committee

While we understand that Bank of Belleville is a small bank that is not primarily focused on mortgage lending, we consider their volume of lending to low- and moderate-income borrowers to be unsatisfactory. The bank's percent of lending is below both the aggregate percentage of lending and the population demographics of their assessment area. We also understand the HMDA data provides only a limited view of the bank's activities. However, we assume the mortgage borrowers reflect the characteristics of the bank's broader customer base and thus are concerned that the bank is inadequately meeting the needs of low- and moderate-income communities. We urge the FDIC to consider the bank's poor service to low- and moderate-income communities on the bank's upcoming CRA performance evaluation.

St. Louis Community
Land Trust

Union Sarah
Community
Corporation

Wellston Community
Support Association

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We also have fair lending concerns with Bank of Belleville, based on extremely low market penetration within minority borrowers and communities. According to the HMDA data from 2008 and 2009, the bank did not originate any loans to African-American or Asian borrowers. The bank received only one application from an African-American borrower in 2008, which was denied. There were two loans originated to Hispanic borrowers, representing 3.33 percent of all loan originations.

In comparison, the aggregate lending in St. Clair County in 2008 and 2009 originated 9.43 percent of loans to African-Americans, 0.92 percent of loans to Asians, and 1.49 percent of loans to Hispanic borrowers. The Bank of Belleville's lack of lending to African-American borrowers is also disturbing when considering the demographics of the bank's assessment area. According to the 2000 Census, the population of St. Clair County includes 28.8 percent African-Americans and 0.9 percent Asians. Hispanics make up 2.2 percent of the population.

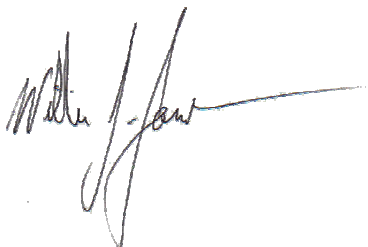
Again, we recognize that Bank of Belleville is not primarily a mortgage lender. However, we believe the HMDA data serves as a reflection of the bank's broader customers. The bank's lack of mortgage lending to African-American borrowers suggests an overall lack of service to African-American customers, especially in comparison to the aggregate lending data and the demographics of the bank's assessment area. We urge the FDIC to conduct a thorough fair lending investigation.

We are concerned with Bank of Belleville's poor service to low- and moderate-income individuals and communities, as reflected in low levels of mortgage lending to low- and moderate-income borrowers. We are also concerned with the bank's poor service to minorities and a lack of mortgage lending to African-American borrowers. We urge the FDIC to consider these concerns in the bank's CRA performance evaluation and fair lending investigation.

It is our desire to work with banks to increase their service to low-income and minority communities. We ask Bank of Belleville to engage in creative and relevant strategies that will increase outreach to those communities. Our coalition is willing to help the bank identify those strategies and create a proactive plan that will better serve the low-income and minority individuals in our shared community.

Thank you for your consideration.

Sincerely,



Will Jordan
Metropolitan St. Louis Equal Housing
Opportunity Council (EHOc)

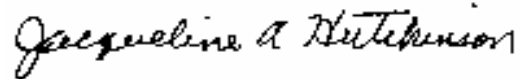


Eddie Davis
Center for the Acceleration of African-American
Business (CAAAB)

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