

St. Louis Equal Housing and Community Reinvestment Alliance

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

Commercial Bank

2330 West Port Plaza Drive
Saint Louis, MO 63146

- Regulated by the FDIC
- Owned by Commercial Bancshares, Inc, a one-bank holding company.
- Assets of \$174,350,000
- Rated Satisfactory in last CRA exam in 2007. Evaluation notes significant lending outside of assessment area, low lending to low-income census tracts and low- and moderate-income borrowers. Home mortgage lending and small business lending included in review.
- Offers mortgages through secondary market investors, which do not appear on bank's HMDA records.
- Assessment Area: St. Louis County
- 3 branches in St. Louis:

Branch	Address	City	State	Zip	Census Tract	Income Level	% Black*	% Asian*	% Hispanic*
Florissant	400 West Washington	Florissant	MO	63031	2112.01	Middle	38.3	0.4	2.9
West Port	2330 West Port Plaza Dr.	Saint Louis	MO	63146	2150.01	Middle	8.2	23.2	3.6
Chesterfield Valley	703 Long Road Crossing Dr.	Chesterfield	MO	63005	2216.29	Upper	1.1	7.8	2.2

* according to 2010 Census.

HMDA analysis

- Decreasing lending over the last three years.
- Loans to African-American borrowers represent 3.25 percent of originations. Zero loans to Asian borrowers. Hispanic borrowers received 1.30 percent of loan originations.
- Low-income borrowers received 5.19 percent of originations, and moderate-income borrowers received 11.69 percent. Large percentage of loans to non-reportable income borrowers, which are businesses or investors.
- Over 20 percent of loans originated to census tracts with 80% or higher minority population.
- Lending to low- and moderate-income census tracts represented 25 percent of all originations.

ORIGINATIONS									
<i>borrower characteristics</i>	2010		2009		2008		three year total		Origination Rate
race/ethnicity	#	%	#	%	#	%	#	%	%
Total	23		67		64		154		81.91%
White	8	34.78%	59	88.06%	46	71.88%	113	73.38%	79.58%
Black	1	4.35%	2	2.99%	2	3.13%	5	3.25%	83.33%
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0.00%
Other	14	60.87%	6	8.96%	16	25.00%	36	23.38%	90.00%
Hispanic	0	0.00%	2	2.99%	0	0.00%	2	1.30%	66.67%

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Commercial Bank (continued)

ORIGINATIONS									
<i>borrower characteristics</i>	2010		2009		2008		three year total		Origination Rate
<i>Income Level</i>	#	%	#	%	#	%	#	%	
Total	23		67		64		154		81.91%
Low-income	3	13.04%	2	2.99%	3	4.69%	8	5.19%	72.73%
Moderate-income	0	0.00%	10	14.93%	8	12.50%	18	11.69%	72.00%
Middle-income	1	4.35%	11	16.42%	8	12.50%	20	12.99%	80.00%
Upper-income	5	21.74%	31	46.27%	23	35.94%	59	38.31%	79.73%
NA	14	60.87%	13	19.40%	22	34.38%	49	31.82%	92.45%

ORIGINATIONS									
<i>Census tract characteristics</i>	2010		2009		2008		three year total		
racial composition	#	%	#	%	#	%	#	%	
< 10% Minority	7	30.43%	38	56.72%	39	60.94%	84	54.55%	
10-19% Minority	2	8.70%	15	22.39%	4	6.25%	21	13.64%	
20-49% Minority	1	4.35%	8	11.94%	8	12.50%	17	11.04%	
50-79% Minority	0	0.00%	1	1.49%	0	0.00%	1	0.65%	
80-100% Minority	13	56.52%	5	7.46%	13	20.31%	31	20.13%	
Income characteristic									
Low-income	1	4.35%	0	0.00%	2	3.13%	3	1.95%	
Moderate-income	13	56.52%	9	13.43%	14	21.88%	36	23.38%	
Middle-income	5	21.74%	24	35.82%	20	31.25%	49	31.82%	
Upper-income	4	17.39%	34	50.75%	28	43.75%	66	42.86%	
NA	0	0.00%		0.00%	0	0.00%	0	0.00%	
Total	23		67		64		154		