

# St. Louis Equal Housing and Community Reinvestment Alliance

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

## **MEMBER**

### **ORGANIZATIONS**

November 23, 2011

Center for the  
Acceleration of  
African American  
Business

Robert J. Carmona  
Deputy Regional Director  
Federal Deposit Insurance Corporation  
2345 Grand Boulevard, Suite 1200  
Kansas City, MO 64108

Community Action  
Agency of St. Louis  
County

RE: Application Number 20111318 – Reliance Bank, Des Peres, MO

Community Resource  
and Development  
Organization

Dear Mr. Carmona:

Consumers Council of  
Missouri

The St. Louis Equal Housing and Community Reinvestment Alliance (SLEHCRA) would like to provide additional comments regarding application number 20111318 of Reliance Bank, Des Peres, MO, to acquire Reliance Bank FSB, Fort Myers, FL. SLEHCRA previously provided comments on this application and requested a delay on this decision until a fair housing complaint with the U.S. Department of Housing and Urban Development was resolved.

Citizens Coalition to  
Fight Eminent  
Domain Abuse

Justine Petersen

We are pleased to announce that Reliance Bank entered into a Community Reinvestment Agreement with our coalition as of November 9, 2011. This Agreement includes serious and substantial commitments made by the Bank in regards to service and outreach in low-income and minority communities, and we consider the Agreement to be a resolution of our previous concerns. Because of this Agreement, the Metropolitan St. Louis Equal Housing Opportunity Council has withdrawn the fair housing complaint against Reliance Bank and the U.S. Department of Housing and Urban Development will be closing this case. We request the FDIC approve the application of Reliance Bank in light of such resolution.

Lemay Housing  
Partnership

Metropolitan St.  
Louis Equal Housing  
Opportunity Council

Missourians  
Organizing for  
Reform and  
Empowerment

MoKan

The Community Reinvestment Agreement was created by Reliance Bank and SLEHCRA together to provide short- and long-term goals for improving service to low- and moderate-income communities and minority communities. The Agreement includes the following provisions over the next three years:

NAACP St. Louis

North County  
Churches Uniting for  
Racial Harmony and  
Justice

Ready, Aim,  
Advocate! Committee

St. Louis Community  
Land Trust

Union Sarah  
Community  
Corporation

- Reliance Bank will increase diversity among bank employees and Board of Directors. Within three years, 10 percent of the Bank's employees will be African-American, at least one employee will be fluent in Spanish and capable of handling banking transactions, and the Bank will add two members to the Board of Directors that increases the racial, ethnic, and gender diversity of the Board.
- In advertising and marketing, 20 percent of advertising dollars will be spent in African-American media outlets and 5 percent in Hispanic media outlets. Marketing materials with human models will include representation of African-American models and other racial minorities.
- Reliance Bank recently created a Small Business Lending program, which will be affirmatively marketed to minority businesses. The Bank will strive to make 20 percent of the number of business loans in predominately minority census tracts.

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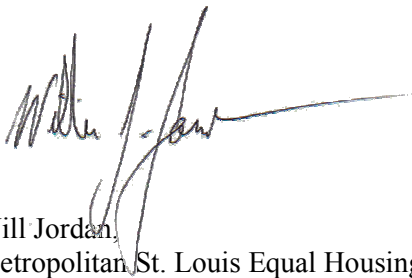
- The Bank has committed \$2 million in mortgage loans to low- and moderate- income borrowers over the term of this Agreement. In addition, the Bank will strive to originate at least 20 percent of the number of mortgage loans per year to low- and moderate-income borrowers.
- The Bank's mortgage loan commitment will be affirmatively marketed to minority borrowers, and the Bank will strive to originate at least 10 percent of the number of mortgage loans per year to minority borrowers.
- The next Reliance Bank branch location opened or acquired will be located in a predominately minority census tract within the City of St. Louis.
- The Bank will develop and market a free checking account and a free savings account designed to meet the needs of underserved communities.
- Over the next three years, Reliance Bank has committed \$40,000 for increased financial literacy and outreach to low-income and minority communities that will be conducted in partnership with SLEHCRA member organizations.
- The Bank has committed \$20,000 over the next three years for financial education for small businesses and minority-owned businesses that will be conducted in partnership with SLEHCRA member organizations.
- All of Reliance Bank employees and members of the Board of Directors will participate in annual fair lending training.

Many of the terms of the Agreement will be achieved through partnerships between the Bank and SLEHCRA member organizations, particularly with financial education and identifying strategies for meeting the target lending goals. Additionally, our coalition will meet with the Bank biannually to discuss progress in meeting the goals of the Agreement. Nothing in the Agreement requires the Bank to conduct business in a way that is unsafe or unsound, and the Agreement does not add additional stress to the Bank's current financial condition.

We believe the Bank has made significant improvements to provide service to underserved communities. This Agreement represents those improvements in clear and specific action goals, which represents the resolution to our previous concerns. Thus, we approve the FDIC moving forward with Reliance Bank's application.

Thank you for your consideration. Please feel free to contact us if you require additional information.

Sincerely,



Will Jordan,  
Metropolitan St. Louis Equal Housing  
Opportunity Council



Lynn Oldham  
Missourians Organizing for Reform and  
Empowerment

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Jackie Hutchinson  
Consumers Council of Missouri



Rose Eichelberger  
Ready! Aim! Advocate! Committee



Galen Gondolfi  
Justine Petersen



Lucille Walton  
Community Resource and Development  
Organization



Rance Thomas  
North County Churches Uniting for Racial  
Harmony and Justice



Janice McKinney  
Community Action Agency of St. Louis County



Adolphus Pruitt  
NAACP St. Louis