

# 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.slehkra.org](http://www.slehkra.org)

October 28, 2013

## **Member**

### **Organizations**

Coalition of  
Concerned Citizens,  
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Community Action  
Agency of St. Louis  
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Community Resource  
and Development  
Organization

Consumers Council of  
Missouri

Justine Petersen

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Missourians  
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Reform and  
Empowerment

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NAACP St. Louis

North County  
Churches Uniting for  
Racial Harmony and  
Justice

Ready, Aim,  
Advocate! Committee

Yvonne Sparks  
Community Development Officer  
Federal Reserve Bank of St. Louis  
P.O. Box 442  
St. Louis, MO 63166

Via email: [yvonne.s.sparks@stls.frb.org](mailto:yvonne.s.sparks@stls.frb.org)

RE: Application of Midland States Bancorp, Inc., Effingham, Illinois, to acquire Heartland Bank, St. Louis, Missouri.

Dear Ms. Sparks:

The St. Louis Equal Housing and Community Reinvestment Alliance (SLEHCRA) would like to offer public comments on the application of Midland States Bancorp, Inc., Effingham, Illinois, to acquire to acquire 100 percent of the voting shares of Heartland Bank, St. Louis, Missouri. SLEHCRA is a coalition working to increase investment in low- and moderate-income communities, regardless of race, and in minority communities, regardless of income, by ensuring that banks are meeting their obligations under the Community Reinvestment Act (CRA) and fair lending laws.

We have serious concerns that Midland States bank is not meeting the needs of low-income communities and communities of color in their current St. Louis market, as well as in other market areas in Illinois. Further, we do not believe that the bank's acquisition of Heartland Bank will create a clear or significant public benefit required by the Bank Holding Company Act (Regulation Y). The law requires prudential regulators to consider the public's interest when approving bank mergers and acquisitions. Section 225.24(a)(iii) of Regulation Y specifically states that every applicant has a duty to state the public benefits that can reasonably be expected to result from the acquisition. The application filed by Midland States does not provide clear or specific public benefits and it does not address how the bank plans to meet the needs of low- and moderate-income communities and communities of color. Midland State's poor past performance in meeting the needs of the community gives the public reason to be concerned about the acquisition of Heartland Bank.

We have concerns with low levels of lending to low-income borrowers and communities in the St. Louis market area, as well as in other market areas in Illinois. We also have serious fair lending concerns with the bank's extremely low market penetration to minority communities in the St. Louis market area, as well as in Champaign, Illinois, Joliet, Illinois, and the bank's central and northern Illinois market areas. Based on the fair lending concerns, the Metropolitan St. Louis Equal Housing and Opportunity Council (EHOC), a SLEHCRA member organization, filed a fair housing complaint against Midland States Bancorp, Inc. and Midland States Bank with the U.S. Department of Housing and Urban Development (HUD). The complaint alleges the bank is discriminating in residential real estate transactions on the basis of race and national origin. We ask the Federal Reserve to not approve the acquisition application until the fair housing complaint has been resolved.

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We believe the bank needs to make commitments that will resolve our concerns and clearly define the public benefits that will be provided to the community. We believe commitments need to be made in regards to branch locations, market penetration to low- and moderate-income communities and communities of color, increased diversity of staff and directors, affirmative marketing and outreach, development of new products and programs, financial education, small business lending, community development lending and investments, and community engagement. We welcome the opportunity to meet with Midland States to develop these strategies and commitments that will provide increased services, products, and investments to underserved communities.

Our concerns regarding Midland States are detailed in depth below. We have concerns regarding the bank's mortgage lending to low-income borrowers and communities, mortgage lending to minority borrowers, small business lending to low- and moderate-income areas, and branch locations.

## **1. Concerns with Lending to Low-Income Borrowers and Communities**

Based on Home Mortgage Disclosure Act (HMDA) data, Midland States is not adequately lending to low-income borrowers or communities in the bank's St. Louis market. We also have concerns with the bank's lending to low-income borrowers and communities in Will County, Illinois, Champaign County, Illinois, and in the bank's central and northern Illinois assessment areas.

In the St. Louis market, the bank's lending to low-income borrowers over the last two years is below the aggregate lending and the demographics of the community. In 2012, the bank originated 6.5 percent of loans to low-income borrowers. Comparatively, the aggregate originated 8.1 percent of loans to low-income borrowers. In 2011, Midland States originated 6 percent of loans to low-income borrowers. The aggregate lenders originated 7.8 percent of loans to low-income borrowers. According to the 2010 Census, 24.5 percent of households in the bank's St. Louis market are considered low-income.

Lending to low-income geographies in the St. Louis market is also below the aggregate level of lending and the demographics of the community. In 2012, the bank originated 1.3 percent of loans to low-income census tracts. The aggregate originated 1.4 percent of loans to low-income tracts. In 2011, the bank did not originate any loans to low-income tracts. The aggregate originated 0.8 percent of loans. The St. Louis assessment area consists of 14.5 percent low-income census tracts. Owner-occupied housing units in low-income census tracts represent 5.5 percent of housing units throughout the St. Louis assessment area. Although the bank's lending to low-income borrowers increased in 2012, we are still concerned with low mortgage lending to low-income communities.

The bank's lending to moderate-income borrowers and communities is good in the St. Louis market. In both 2012 and 2011, lending to moderate-income borrowers is above the aggregate level of lending and the percentage of moderate-income households in the St. Louis area. Lending to moderate-income census tracts is above the aggregate lending in 2012 and 2011. However, it is below the demographics of the community and has been in decline over the last three years. In 2012, lending to moderate-income tracts represented 9.77 percent of loans. In 2011, lending to moderate-income tracts represented 10.9 percent of loans and in 2010 represented 14.3 percent of loans. In the St. Louis assessment area, 19.7 percent of census tracts are considered moderate-income and contain 16.5 percent of the owner occupied housing units in the entire area.

In Joliet, Illinois in Will County, the bank did not originate any loans to low- or moderate-income

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borrowers in 2012. In 2011, the bank originated zero loans to low-income borrowers and one loan to a moderate-income borrower. The aggregate lenders originated 6.7 percent of loans to low-income borrowers and 15.8 percent of loans to moderate-income borrowers. Although the bank's lending volume in Will County, Illinois is relatively low, we have concerns that the bank is failing to reach low- and moderate-income borrowers.

We also have concerns with the bank's lending to low-income borrowers in the bank's central, northern, and Champaign County, Illinois, based on HMDA data in the last two years. Although the bank's loan originations to low-income borrowers are similar to or above the aggregate lending levels, the bank's lending is below the percentage of low-income households in each of those market areas. In the bank's Central Illinois assessment area, Midland States originated 7.7 percent of mortgage loans to low-income borrowers in 2012. In 2011, the bank originated 9.2 percent of loans to low-income borrowers. Comparatively, 24.3 percent of households in the central Illinois assessment area are considered low-income. Similarly, mortgage lending to low-income borrowers in the bank's northern Illinois assessment area is below the demographics of the community. In 2012, the bank originated 7.6 percent of mortgage loans to low-income borrowers. In 2011, the bank originated 9.4 percent of loans to low-income borrowers. Comparatively, 19.5 percent of households are considered low-income in the bank's northern Illinois assessment area.

In Champaign County, Illinois, the bank's home mortgage lending has dramatically increased in volume as of 2012, according to the HMDA data. In 2012, the bank originated 265 mortgage loans in Champaign County, of which 7.5 percent were originated to low-income borrowers. According to the census, 27.5 percent of households in Champaign County are considered low-income. The aggregate lending originated 6.7 percent of loans to low-income borrowers. Lending to low- and moderate-income geographies in Champaign, Illinois in 2012 is below the aggregate lenders. The bank originated 2.6 percent of loans to low-income census tracts and 4.9 percent to moderate-income census tracts. Comparatively, the aggregate originated 3 percent of loans to low-income tracts and 7.6 percent of moderate-income tracts.

Furthermore, Midland State's CRA performance exam in August 2011 notes the bank's poor penetration of mortgage lending to low-income borrowers and to low-income census tracts considering the demographics of the St. Louis assessment area, as well as in their central Illinois and northern Illinois assessment areas. The exam notes that lending to low-income borrowers in central and northern Illinois is well below the low-income family population percentage. Although the exam considered the bank's lending reasonable, we are concerned with the continuation of low performance in serving low-income families across multiple assessment areas.

## **2. Concerns with Lending to Minority Borrowers**

We have serious fair lending concerns regarding Midland State's market penetration to minority borrowers, particularly African-American and Hispanic borrowers. Based on HMDA data, the bank has extremely low market penetration to minority borrowers over the last four years, specifically African-American and Hispanic and Asian borrowers in the bank's St. Louis assessment area. We also are concerned with low market penetration to minority borrowers in Champaign, Illinois, Joliet, Illinois, as well as in central and northern Illinois assessment areas.

In the St. Louis assessment area, from 2009 to 2012, the bank reported only 6 loan applications from

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African-Americans out of a total 1,530 loan applications. African-Americans represent 0.39 percent of applicants over that four year period. The bank originated 4 loans to African-Americans out of 1,128 total loans originated. In 2012, the bank originated 3 loans to African-American borrowers, which represented 1 percent of borrowers. In 2010 and 2011, the bank did not originate any loans to African-Americans. From 2009 to 2012, African-Americans represented 0.35 percent of the bank's borrowers, which is significantly lower than the aggregate levels of lending and the demographics of the community. In 2012, the aggregate lenders received 5.4 percent of applications from African-Americans and originated 4.6 percent of loans to African-American borrowers. In the bank's St. Louis assessment area, African-Americans represent 20.7 percent of households. We are seriously concerned with the bank's extremely low market penetration to African-American borrowers in the St. Louis area.

The bank's lending to Hispanic borrowers is also low in the St. Louis market area. According to HMDA data, from 2009 to 2012, the bank only received 7 loan applications from Hispanic borrowers, which represented 0.46 percent of all applicants. The bank originated 5 loans to Hispanic borrowers out of a total of 1,128 loans originated over the four year period. Hispanic borrowers represented 0.44 percent of the bank's borrowers, which is significantly lower than the aggregate lending and the demographics of the community. In 2012, the aggregate lenders originated 1.1 percent of loans to Hispanic borrowers. Hispanics represent 1.9 percent of households in the St. Louis assessment area.

Similarly, the bank's lending to Asian borrowers in the St. Louis market area is below the aggregate levels of lending and the demographics of the community. According to HMDA data from 2009 to 2012, the bank received 8 loans from Asian borrowers, representing 0.52 percent of applicants. The bank originated 3 loans to Asian borrowers, which represented 0.27 percent of all loan originations over the four year period. The bank did not originate any loans to Asian borrowers in 2012. In contrast, the aggregate lenders originated 2.3 percent of loans to Asian borrowers in 2012. Asian households represent 2.1 percent of the households in the St. Louis area.

In Champaign, Illinois, we are also concerned with the bank's extremely low market penetration to African-American and Hispanic borrowers. The bank's volume of loans increased substantially over the last year, with 265 loan originations in 2012 compared to 27 loans in 2011, 39 loans in 2010, and 12 loans in 2009. In 2012, the bank originated 4 loans to African-American borrowers, which represented 1.5 percent of borrowers. The bank received only 6 loan applications from African-Americans, representing 1.8 percent of applicants in 2012. From 2009 to 2011, the bank did not originate any loans to African-American borrowers. In 2009 and 2010, the bank did not originate any loans to Hispanic borrowers. In 2011, the bank originated one loan to a Hispanic borrower. In 2012, the bank originated 2 loans to Hispanic borrowers, which represented 0.8 percent of borrowers. Comparatively, in 2012 the aggregate lenders in Champaign County, Illinois originated 3.3 percent of loans to African-American borrowers and 1.6 percent of loans to Hispanic borrowers. African-Americans represent 11.2 percent of households and Hispanics represent 3.7 percent of households in Champaign County, Illinois.

In Joliet, Illinois in Will County, we also have concerns with the bank's low market penetration to African-American and Hispanic borrowers. The bank's lending volume in Will County is relatively small, with 22 loan originations from 2010 to 2012. The bank entered the Joliet, Illinois market in 2010. However, the bank did not originate any loans to African-American borrowers over the last three years. The bank originated 1 loan to a Hispanic borrower. In 2012, the aggregate lending originated 4 percent of loans to African-American borrowers and 6.1 percent of loans to Hispanic borrowers. African-Americans represent 10.7 percent and Hispanics represent 10.7 percent of households in Will County.

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We also have concerns with low market penetration to African-American and Hispanic borrowers in the bank's central Illinois assessment area. According to HMDA data from 2009 to 2012, the bank originated 7 loans to African-Americans out of the total 1,362 loans originated. African-Americans represent 0.51 percent of all borrowers. The bank originated 8 loans to Hispanic borrowers, which represent 0.59 percent of borrowers from 2009 to 2012. Comparatively, the population of households in the bank's central Illinois market area consists of 1.8 percent African-American households and 1.1 percent Hispanic households.

We are also concerned with the bank's low market penetration to African-American borrowers in the bank's northern Illinois assessment area. According to HMDA data from 2009 to 2012, the bank originated only 2 loans to African-American borrowers out of 735 total loans originated. The bank did not originate any loans to African-Americans in 2009, 2010, or 2012. From 2009 to 2012, African-Americans represent 0.27 percent of the bank's borrowers. In the northern Illinois assessment area, African-Americans consist of 1.8 percent of households. Interestingly, the bank's lending to Hispanic borrowers in the northern Illinois area is excellent. In the last four years, the bank's lending to Hispanic borrowers has increased and is above the household demographics. In 2012, the bank originated 21 loans to Hispanic borrowers, which represents 7.3 percent of all borrowers. Hispanic households represent 4.9 of households in the bank's northern Illinois assessment area. We recognize the bank's work in serving the Hispanic community in northern Illinois market area. However, we remain concerned with how the bank appears to be serving African-Americans in northern Illinois.

Based on the analysis of HMDA data over the last four years, we have serious concerns with the bank's extremely low market penetration to minority communities. We have concerns with the bank's failure to market to African-American communities, as well as Hispanic and Asian communities in the St. Louis market, the area where Midland States plans to grow significantly with the acquisition of Heartland Bank. We are also concerned with market penetration to African-Americans and Hispanics in Champaign, Illinois and in Joliet, Illinois, both of which are urban areas where the bank is growing. We are also concerned with underperformance in serving minority borrowers in the bank's central and northern Illinois market areas.

### **3. Concerns with Small Business Lending to Low- and Moderate-Income Communities**

We are concerned with Midland State's performance in serving small businesses located in low- and moderate-income (LMI) communities. According to the CRA disclosure data, the bank's lending in 2011 to LMI tracts was below the aggregate lending and the demographics of the community in all of their market areas. However, the 2012 data shows improved performance in lending to LMI geographies across the bank's market.

In the bank's St. Louis market area, lending to businesses in LMI tracts was significantly below the aggregate lending and the demographics in 2011. In 2011, the bank originated 4.55 percent of small business loans to LMI geographies. Comparatively, all lenders originated 17.25 percent of loans to LMI tracts. In 2012, the bank's performance improved significantly, although lending is still slightly below the aggregate lenders and the percentage of businesses in LMI tracts. The bank originated 19.32 percent of loans to small businesses located in LMI census tracts in 2012, compared to the aggregate which originated 19.89 percent. Businesses in LMI tracts represent 22.46 percent of businesses in the bank's St. Louis assessment area.

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The bank's small business lending in LMI tracts in Champaign County, Illinois was also below the aggregate lending in 2011, although it increased in 2012. In 2011, the bank originated 13.04 percent of loans in LMI tracts, compared to the aggregate's 26.91 percent of loans in LMI tracts. In 2012, the volume of small business loans decreased. The bank originated 4 loans in LMI tracts, which represented 36.36 percent of all loans. In 2012, the aggregate originated 26.73 percent of loans in LMI tracts. There are 28.77 percent of small businesses located in LMI tracts.

Small business lending in Will County, Illinois increased in volume and in lending to LMI tracts from 2011 to 2012. In 2011, the bank did not originate any loans to LMI tracts. In 2012, the bank originated 20 percent of loans to LMI tracts. Comparatively, the aggregate originated 9.81 percent of loans to LMI tracts and there are 12.05 percent of businesses located in LMI geographies.

In the bank's central Illinois assessment area, the bank originated 4.17 percent of loans in 2011 to LMI tracts. In 2012, the bank reports 15.87 percent of loans to LMI tracts. The aggregate lenders originated 6.81 percent of loans in 2011 and 12.69 percent of loans to LMI tracts in 2012. In central Illinois, 13.45 percent of small businesses are located in LMI tracts, which increased since 2011.

Lending to small businesses in the bank's northern Illinois area is similar to the aggregate lending and the demographics of the community, although the bank's lending slightly decreased in LMI tracts from 2011 to 2012. In 2011, the bank originated 6.71 percent of loans to LMI tracts. In 2012, the bank reports 6.25 percent of loans in LMI tracts. The aggregate lenders originated 6.65 percent of loans in 2012 to LMI tracts. In the northern Illinois area, 6.26 percent of small businesses are located in LMI tracts.

We recognize the bank's increase in small business lending to LMI tracts increased from 2011 to 2012. However, we are concerned that the bank was significantly underperforming in lending to LMI geographies in 2011. Although the bank's performance improved in all market areas, there still is room for improvement in lending to LMI geographies, particularly in the St. Louis assessment area where the bank is planning on expanding.

## **4. Concerns with Lack of Branch Locations in Low-Income Communities and Minority Communities**

We are also concerned that the bank does not have any branch locations in low-income census tracts or in census tracts with predominantly minority population. The bank operates 31 branch locations throughout all of its assessment areas. Zero branches are in low-income census tracts. The bank operates two branches in moderate-income census tracts, with one in the central Illinois area and another in northern Illinois market area. In the bank's combined assessment areas, there are 92 low-income census tracts (10.2 percent of all tracts) and 151 moderate-income census tracts (16.8 percent of tracts). A majority of the low-income and moderate-income tracts are in the St. Louis area, as well as in Champaign, Illinois and Joliet, Illinois. The bank does not have any branches located in low- or moderate-income tracts in any of these market areas.

The bank also does not have any branch locations in predominantly minority areas. The bank's urban markets of St. Louis, Champaign, and Joliet, Illinois, are areas with significant African-American populations, yet the bank's branch locations in these markets are all in areas with predominantly white populations.

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In the St. Louis assessment area, the bank operates 8 branch locations. The bank's location in Chesterfield, Missouri is in census tract with 1.1 percent African-American population; the Smithton, Illinois branch is in a census tract with 0.7 percent African-American population; the Columbia, Illinois branch is in a census tract with 0.4 percent African-American population; the Freeburg, Illinois branch is in a census tract with 0.1 percent African-American population; the bank's 3 locations in Waterloo, Illinois are located in a census tract with 0.1 percent African-American population; and the bank's Greenville, Illinois<sup>1</sup> branch is located in a census tract where African-American households represent 4.1 percent of households. African-Americans represent 22.2 percent of the population in the bank's St. Louis market area.

The bank's location in Champaign, Illinois is located in a census tract with 6.2 percent African-American population, whereas the population of the city consists of 15.6 percent African-Americans.

In Joliet, Illinois, the bank's branch is in a census tract with 7.2 percent African-American population, whereas the population of the city consists of 16 percent African-Americans. Furthermore, Midland States acquired three locations in Will County and Kankakee County, Illinois in June 2013. The bank's location in Beecher, Illinois is located in a census tract with 2.3 percent African-American population; the Grant Park branch is located in a census tract with 0.2 percent African-American population; and the Bourbonnais branch is in a census tract with 15.1 percent African-American population.

As seen in the data analysis above, we are concerned that Midland States is currently not serving the needs of low- and moderate-income communities and communities of color throughout the bank's footprint in mortgage lending, small business lending, and branch locations. Principally, we have serious concerns with the bank's performance in the St. Louis market area, which is where the bank is planning on expanding through the acquisition of Heartland Bank.

In contrast to Midland States poor performance in the St. Louis area, Heartland Bank's performance is good in lending to low-income borrowers and minority borrowers when compared to the aggregate lending. According to the 2012 HMDA, Heartland Bank originated 9.82 percent of loans to low-income borrowers, which is above the aggregate lending performance of 9.01 percent of loans originated to low-income borrowers. However, Heartland Bank and all lenders are lending below the 24.2 percent households that are considered low-income in the St. Louis metropolitan area. Heartland Bank is also leading the market in lending to African-American borrowers, although the percentage of loans is still far under the demographics of the community. In 2012, the bank originated 6.76 percent of loans to African-American borrowers. The aggregate lenders originated 3.96 percent of loans to African-American borrowers. African-American households represent 20.49 percent of the population. All lenders are far below the comparable population, but we recognize Heartland Bank's efforts in leading the market in lending to African-American borrowers.

We do have concerns that Heartland Bank does not have any branch locations in low-or moderate-income census tracts or in predominantly minority census tracts. The bank operates 13 branch locations in the St. Louis metro area. None of the bank's branches are in low- or moderate-income census tracts, and none of the branches are in predominantly minority census tracts. Additionally, none of the bank's locations are in the City of St. Louis, which has a significant number of the metro area's LMI census tracts and areas with predominantly minority population. With the acquisition by Midland States, it is essential that the bank

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<sup>1</sup> Note that, for the Greenville census tract, population of households was analyzed rather than individual population because the bank branch is located in same census tract as a correctional institution.

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increases service to low- and moderate- income areas and predominantly minority areas in order to provide equal access to financial services throughout the region.

Midland States has expanded significantly in recent years through acquisitions and mergers. According to the bank, the acquisition of Heartland Bank will be the ninth acquisition since 2007. Yet, the bank's expansion and growth has resulted in poor service to the community, particularly in more urban areas. Specifically, Midland State's growth in the St. Louis market area since the acquisition of WestBridge Bank and Trust in Chesterfield, Missouri in 2010 has not resulted in banking services being provided for the benefit of the community. The bank has poor performance in meeting the needs of the community, particularly low-income communities and minority communities. In Champaign, Illinois, the bank acquired Strategic Capital Bank in 2009, yet the bank is providing poor service to minority borrowers and low- and moderate-income communities based on the most recent lending data. The bank opened a branch location in Joliet, Illinois in Will County in 2010, and is also not meeting the needs of low- and moderate-income borrowers or of minority borrowers. In June 2013, the bank acquired Grant Park Bancshares, which increased its presence in Will County and Kankakee County, Illinois. This expansion into more urban areas gives us reason to be concerned considering the bank's poor performance in current market areas of serving low-income communities and minority communities.

In addition to serious concerns with Midland State's CRA and fair lending performance, we also have concerns that this acquisition will not meet the convenience and needs of bank customers and will not provide significant benefits to the public.

The application of Midland States Bancorp, Inc. to acquire Heartland Bank states that "the Bank Merger will meet the convenience and needs of Midland State's expanded customer base by providing to Midland State's existing customers a wider array of banking and wealth management products and services through a larger number of offices and ATMs. The bank merger will benefit the community by creating a stronger, more competitive banking franchise." Additionally, the application states that Midland States "will continue to strive to provide for the credit needs of all elements of its communities, including the needs of low- and moderate-income geographies and individuals. The Bank will continue to be responsive to the needs of the customers and the communities that Midland States and Heartland currently serve." The application does not adequately describe how the bank's current activities are meeting the needs of the communities. It also does not adequately outline how specifically it plans on meeting the needs of the community, particularly underserved communities. We would like to know what it means for the bank to "continue to strive" in providing for the credit needs of the community. We believe the bank has the obligation under the Bank Holding Company Act to explain in detail their plans for serving all parts of the community and how low- and moderate-income communities and communities of color will be able to access the bank's products and services.

The lack of clear and significant public benefits in Midland State's acquisition of Heartland Bank gives reason for the public to be concerned. In addition, Midland State's record of meeting the needs of the community is inadequate, particularly to low-income borrowers and minority borrowers in their St. Louis market as well as other market areas in Illinois.

As stated above, the Metropolitan St. Louis Equal Housing and Opportunity Council (EHOC), a SLEHCRA member organization, filed a fair housing complaint with HUD against Midland States Bancorp, Inc. and Midland States. The complaint is based on serious fair lending concerns with the bank's lack of mortgage market penetration to African-American and Hispanic borrowers, as well as



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the locations of bank branches that do not provide equal access to African-Americans or African-American communities. We ask the Federal Reserve to not approve the application until the fair housing complaint has been resolved.

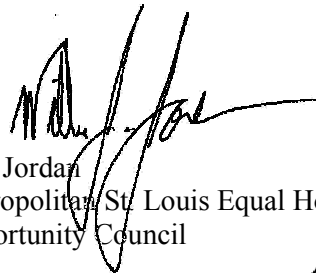
We believe that Midland States needs to make commitments that will clearly define the public benefits that will be provided to the community as a result of its expansion. We believe commitments need to be made in the following areas: increasing branch locations in low- or moderate-income census tracts with predominantly minority population; increasing market penetration in low-income communities and communities of color; increasing diversity of loan officers, staff and directors; conducting affirmative marketing and outreach; developing new products and programs that meet the needs of lower income customers; supporting financial education; increasing small business lending in low- and moderate-income communities; supporting community development lending and investments; and developing community engagement in each of the bank's market areas. Our coalition stands ready to partner with Midland States to develop these commitments for the benefit of our entire community.

Thank you for your consideration.

Sincerely,



Jackie Hutchinson  
Consumers Council of Missouri



Will Jordan  
Metropolitan St. Louis Equal Housing and  
Opportunity Council



Lynn Oldham  
Missourians Organizing for Reform and  
Empowerment



Dr. Rance Thomas  
North County Churches Uniting for Racial  
Harmony and Justice



Adolphus Pruitt  
NAACP St. Louis City



Rose Eichelberger  
Ready! Aim! Advocate! Committee



Rob Boyle  
Justine Petersen



Merline Anderson  
Community Action Agency of St. Louis County