



**TREASURER'S OFFICE**  
**Tishaura O. Jones, Treasurer**  
CITY OF SAINT LOUIS  
MISSOURI

To Whom It May Concern:

Pursuant to City Ordinance #64457, the Funds Committee, consisting of the Mayor, the Comptroller, and the Treasurer is required each year to evaluate the financial institutions seeking to be City depositories. This process must be completed not later than June 1, 2020.

According to the city code, the Treasurer's office has the authority to encourage banks and financial institutions to increase their financial commitment to the revitalization of the City through mortgage and home improvement loans to credit-worthy individuals and through commercial loans to facilitate development and redevelopment throughout the City. This year we are requiring banks provide a Community Reinvestment Plan, which establishes clear goals for lending, investing, and charitable giving for two years. This plan should also describe foreclosure prevention, servicing best practices, and targets for meaningful assistance to distressed borrowers.

Additionally, it shall be the duty of the Treasurer to advertise annually for the submission of applications from regularly organized national and state depositories insured by the Federal Deposit Insurance Corporation for certification as depositories for funds of the City.

This year, the application process requires the following data:

- 1. Residential Loans.** Data for the last calendar year at the census tract block level. Data should include:
  - a. One- to four-family home purchase loans
  - b. Refinance home loans
  - c. Home improvement loans
  - d. Home equity loans
  - e. Multi-family loans
  - f. Loans to non-occupant owners of single-family properties
  - g. Modifications of distressed loans and type of modification, including interest rate reductions, forbearance, principal reduction, or repayment plans in which the outstanding loan amount increases, and an indication of whether the modification was executed under the Federal Home Affordable Modification Program (HAMP), another Federal program, or the institution's own modification program
  - h. Defaults and delinquencies on home loans – reported for the entire city, not by census tract
  - i. Real Estate Owned properties



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2. **Small Business Loans.** Loans to small businesses with revenues above \$1 million will be reported separately from loans to small businesses under \$1 million. The depository will use the same reporting procedures as mandated by CRA.
  - a. Total number and dollar amount of small business loans for the entire city.
  - b. Total number and dollar amount of small business loans for each census tract.
  - c. Total number and dollar amount of small business loans for minority and women-owned business enterprises for the entire city.
  
3. **Community Development Loans and Investments.** Each loan and investments will be designated as affordable housing, small business development, economic development, community facilities, or another activity as defined by the CRA.
  - a. Total number and dollar amount of community development loans for the entire city.
  - b. Total number and dollar amount of community development loans for each census tract.
  
4. **Branches and Deposits.** Number of branches and ATMs in the City as well as the address of each branch and ATM with the number and dollar of deposits for each branch.
  
5. **Consumer Loan Data (only required by banks that choose to collect the data for CRA consideration).**
  - a. Number and dollar amount of consumer loans for the entire city.
  - b. Number and dollar amount of consumer loans for each census tract.
  
6. **Workforce**
  - a. Number and proportion of minorities, females, and city residents employed for each bank delineated by employees, senior management, and members of the board of directors.
  - b. Minimum wage offered to employees if it is about the state and/or federal minimum wage.
  
7. **Annual Report.** Most recent annual report or SEC-10K report with quarterly financial updates and other filings
  
8. **Community Reinvestment Plan.** A Community Reinvestment Plan should establish goals in terms of loans, investments, and services for two years. The Plan should also



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describe current and proposed initiatives to address the financial needs of the City, its residents and businesses, including low-and-moderate income residents, minority residents, older adults, low-and-moderate income communities for residential, small business, and community development loans and investments. The Plan should also include goals for the following categories:

- a. Small consumer loans, including those that serve as an alternative to payday loans;
- b. Second-chance checking accounts or other programs for the unbanked and/or underbanked community;
- c. List your banks involvement with the Calls to Actions in the Forward Through Ferguson Report.;
- d. Affordable check cashing and other transactional services used by consumers with limited banking accounts or experiences;
- e. Participation in City-sponsored neighborhood development programs and consortiums;
- f. Equitable contributions to community based non-profit organizations in the City that engage in neighborhood development;
- g. Provision of full service banking in City neighborhoods;
- h. Plan to market loan products and services throughout the City to include (1) low and moderate income neighborhoods, (2) minority neighborhoods, (3) low and moderate income consumers (4) minority consumers (5) small businesses, (6) minority business enterprises and (7) female business enterprises; (8) older adults; and,
- i. The Community Reinvestment Plan shall also indicate how the bank will match or exceed peer performance in lending, investment, and services to the target group.

**9. CRA Exam Evaluation.** Most recent CRA exam evaluation.

**10. Branch Closing Policy.** A copy of the institution's branch closing policy.

**11. Bank On 2.0.** The goal of Bank On is to make sure that everyone has access to a safe and affordable bank or credit union account. Please provide proof of Bank On 2.0 certification or describe low-cost bank products which comply or come close to complying with Bank 2.0 standards.



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**12. Financial Education Efforts in the Community.** Describe in a brief narrative the activities or efforts of your institution to provide financial education in the City of St. Louis. This includes but is not limited to participation in events, outreach, special projects, or resources (financial or otherwise) provided to organizations in support of financial education and empowerment.

This request for information gives us an opportunity to have a complete picture of your financial institution, as the Home Mortgage Disclosure Act (HMDA) report previously submitted only highlights one part of your business.

In addition to submitting your annual HMDA for calendar year 2019, a copy of this letter, instructions for completion, and an Excel template for reporting purposes is located on our website at <https://www.stltreasurer.org/treasury-operations>. This information must be received in the Treasurer's Office, along with a signed copy of the affidavit form included in the instructions, **on a removable USB drive no later than May 1, 2020.**

If you have any questions, please do not hesitate to contact me at (314) 622-3434.

Sincerely,

Tishaura O. Jones  
Treasurer, City of St. Louis