

BANKPLUS RESPONSE TO FDIC REGARDING HMDA APPLICATIONS RECEIVED FROM AFRICAN AMERICANS

1. BankPlus has received four consecutive “Outstanding” ratings from the FDIC on its CRA examinations over the past 12 years. The “Outstanding” ratings were earned because of the bank’s ongoing commitment to meeting the credit needs of all of the communities we serve. BankPlus is recognized as a leader in community development across the State of Mississippi and the Southeast Region of the United States. BankPlus is often the only bank involved in various community development initiatives that relate to African Americans across the state, e.g. Mississippi Minority Business Development Agency, Mississippi Valley State University Annual Scholarship Luncheon, etc.
2. CRA evaluations evaluate a bank’s lending to LMI people and geographies, small businesses and small farms, and community development lending.
3. Although BankPlus received a smaller number of HMDA applications from African Americans in 2020 for Mississippi, BankPlus approved a higher percentage of these applications (58.3% - State, 57.9% - Combined Assessment Areas) than the peers (43.4% - State and 50.2% - Combined Assessment Areas). This demonstrates the bank’s willingness to make loans to African Americans.

Many African Americans already have longstanding relationships with other banks in the respective assessment areas. They are extremely loyal to those banks, and many have personal relationships with bank staff. Therefore, they request loans from their existing banks. Only when these customers experience dissatisfaction with their current bank, will they consider going to another bank for accounts and loans.

4. The limited number of HMDA applications from African Americans in Louisiana and Alabama are attributable to the following:
 - a. BankPlus acquired State Bank on 4/1/20.
 - b. Because of system conversions and training, BankPlus was unable to engage in many outreach activities during 2020. Additionally, COVID-19 impeded the bank’s ability to meet with community residents.

BANKPLUS RESPONSE TO FDIC REGARDING HMDA APPLICATIONS RECEIVED FROM AFRICAN AMERICANS

- i. Town hall meetings were hosted virtually in Louisiana in 2021 to inform the community about product offerings, and to assess the needs of the community.
 - ii. Town hall meetings are scheduled for Alabama in 2022.
5. What banks, mortgage companies, and lenders are included in the peers? If online lenders are included, they are not truly our peers.
6. Were HMDA loan originations and purchased HMDA loans included in the FDIC analysis? BankPlus does not purchase loans. Therefore, only HMDA originations should have been included in the analysis.
7. Raw underwriting disparities for HMDA loans are lower for BankPlus than peers, which demonstrate the bank's willingness to make loans to African Americans.
8. BankPlus is committed to meeting the needs of minority residents of the communities it serves. This is evidenced through its Minority Business Development Department, which is headed by Debra McGee (an African American). Also, in an effort to improve the number of loan applications received from minorities, BankPlus created CreditPlus in 2008. Over 80% of the participants in this program are LMI borrowers, and the majority of participants (by visual observation) are African American. Also, BankPlus has a number of minority lenders and employees located in many of its assessment areas. Additionally, the Director of Community Development and the Banking Center President for Jackson are African American.
9. Debra McGee and David Johnson, Sr. recently met with Tim Lampkin, CEO of Higher Purpose, Inc. in Clarksdale, MS to discuss formation of a partnership with BankPlus. Higher Purpose assists minority business owners across the state of Mississippi in securing loans from financial institutions by providing training, guaranties, participations, and crowdfunding. The Community Development Department has included \$5,000 in its budget to support Higher Purpose, Inc.

BANKPLUS RESPONSE TO FDIC REGARDING HMDA APPLICATIONS RECEIVED FROM AFRICAN AMERICANS

10. BankPlus actively recruited and hired a high-profile minority loan officer, George Seago, for DeSoto County in 2020. George is actively involved with a number of minority organizations and initiatives in that area. He has engaged in a number of outreach activities to attract minorities to BankPlus. One of the most significant outreach activities was outreach to Brown Baptist Church, which is the largest African American church in DeSoto County.
11. David Johnson, Sr., Senior Vice President and Director of Community Development, served on the board of the Mississippi Minority Business Alliance for over ten years. Because of his support of and involvement in the initiatives of this organization, he was awarded the Trail Blazer Award. Debra McGee, Senior Vice President and Director of Minority Business Development, succeeded David on the board of MMBA.
12. BankPlus has sponsored a number of fundraising events for WWISCAA to support its programs in Warren, Washington, Issaquena and Sharkey Counties for several years. WWISCAA provides income qualified residents, and those seeking stability, a number of services including the following: Food for Seniors and the Homebound; Homemaker Services; Emergency Financial Assistance and Self-Sufficiency; Workforce Investment; and Weatherization. Most of their clients are African American.
13. BankPlus regularly provides sponsorships and contribution to minority churches and other organizations that support minority businesses and communities. The bank regularly engages in facilitating workshops for these organizations to inform them of the bank's products and services, and to solicit business from their parishioners and members. (Mississippi Southern First Ecclesiastical Jurisdiction Church of God in Christ, Mississippi Southern Second Ecclesiastical Jurisdiction Church of God in Christ, New Horizon International Church, Pearl Street AME Church, Bertha Chapel M.B. Church, Common Ground Church)
14. BankPlus has been a financial supporter of the Mississippi State NAACP for over 15 years. The bank also supports several local NAACP chapters. Bank

BANKPLUS RESPONSE TO FDIC REGARDING HMDA APPLICATIONS RECEIVED FROM AFRICAN AMERICANS

personnel have facilitated seminars and workshops at many of these institutions, and asked for business from members.

15. BankPlus regularly provides ads for two minority newspapers – The Mississippi Link, and The Jackson Advocate. The ads are placed in these newspapers to encourage African Americans to consider BankPlus for their banking needs. Additionally, BankPlus provides funds to The Jackson Advocate for their Reading Program. The bank's funds are used to purchase newspapers for students in the Jackson Public School District. The newspapers are taken home by the students to share with their parents. Also, Debra McGee was featured in Today's Mississippi, which is a minority-owned newspaper in Columbus, MS.

16. BankPlus has made numerous financial contributions to HBCUs in Mississippi (Jackson State University, Alcorn State University, Mississippi Valley State University, and Tougaloo College) as well as Louisiana (Dillard University). BankPlus contributed \$1 million to Jackson State University College of Business to endow the BankPlus Chair of Accounting. Debra McGee serves on the JSU Development Foundation Board, and Advisory Council for the Women's Business Center at JSU. David Johnson, Sr. serves as chair of the Jackson State University College of Business Advisory Council.

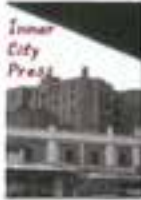
The bank has facilitated numerous workshops and seminars on credit, budgeting, investing, and its affordable housing program at JSU. Recently, bank employees meet with the CFO of Alcorn State University and discussed the bank's affordable housing program, and expressed a desire to make loans to faculty, staff and members of the college community. Bank staff agreed to facilitate homebuyer education workshops for faculty, staff, students, and community residents. Bank personnel also met with staff members from Mississippi Valley State University (MVSU) and discussed the bank's desire to help address the dire housing needs of the Mississippi Delta. Bank staff volunteered to assist MVSU in forming a nonprofit housing organization, facilitating homebuyer education workshops, and making grants available to first time homebuyers.

BANKPLUS RESPONSE TO FDIC REGARDING HMDA APPLICATIONS RECEIVED FROM AFRICAN AMERICANS

17. BankPlus' Community Development and Affordable Housing staff members have met with Bishop Willie Cage, CEO of Liberty Restoration Community Development Corporation in Hammond, LA, to discuss housing needs of the area, and how to address those needs. The bank plans to work with the organization to submit an affordable housing grant application to the Federal Home Loan Bank of Dallas. The grant will assist first time homebuyers with down payment and closing costs. Many of these individuals will be African American.

18. BankPlus has provided financial support to West 30's Redemption in Covington, LA for the past two years. The organization was founded in 2017 to provide affordable housing for lower-income families in the West 30's neighborhood in Covington, LA. Most of these families are African American.

**BANKPLUS RESPONSE TO FDIC REGARDING HMDA APPLICATIONS RECEIVED
FROM AFRICAN AMERICANS**



Inner City Press

In Other Media-eg [New Statesman](#), [AJE](#), [FP](#), [Georgia](#), [NYT](#), [Azerbaijan](#), [CSM](#) [Click here to contact us](#)

These reports are [usually](#) available through [Google News](#) and on Lexis-Nexis

[Share](#) |

[Tweet](#)

[Follow on TWITTER](#)

[Home](#) -

[Donate](#)



These reports are [usually](#) available through [Google News](#) and on Lexis-Nexis

[CONTRIBUTE](#)

[\(FP Twitterati 100, 2013\)](#)

[ICP on YouTube](#)

More: [InnerCityPro](#)

[BloggingHeads.tv](#)
[Sept 24, 2013](#)

Follow [@FUHCA_info](#)

[UN: Sri Lanka](#)

[VoA: NYCLU](#)

[FOIA Finds](#)

[Google, Asked at UN](#)
[About Censorship,](#)
[Moved to Censor the](#)
[Questioner, Sources](#)
[Say, Blaming UN](#) - [Update](#)
- [Editorial](#)

After Investors Bank Hit With FDIC Conditions, CRA Protest To BankPlus - First Bank and Trust

By Matthew Russell Lee, [Patreon](#) [Story](#) [Order](#)
[BBC](#) - [Guardian UK](#) - [Honduras](#) - [ESPN](#)

FEDERAL COURT / S Bronx, Nov 13 –

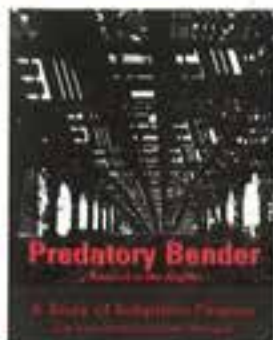
Whether or not the U.S. Community

Reinvestment Act will be again enforced until the new Administration and its regulators is an open question. And now for the FDIC, BankPlus' application to acquire First Bank and Trust will be a litmus test.

On November 12, Fair Finance Watch and Inner City Press filed with the FDIC:

"This is a first timely comment opposing, requesting hearings and an extension of the comment period on the applications by BankPlus to acquire First Bank and Trust As an initial matter, this is a request that the FDIC immediately send by email to Inner City Press all non-exempt portions of the applications / notices for which the Applicants have requested confidential treatment.

[Support this work by
buying this book](#)



[Click on cover for secure
site orders](#)

also includes ["Toxic Credit in the
Global Inner City"](#)

[Community
Reinvestment](#)

[Bank Beat
Freedom of Information](#)

[How to Contact Us](#)

Fair Finance Watch has been tracking BankPlus:

The applicant BankPlus 2020 in Mississippi based on its disparate marketing made 1918 mortgage loans to whites, with 198 denials to whites -- while making only 211 loans to African Americans, with 80 denials. This is far out of keeping with the demographics, and other lenders, in Mississippi - this is outrageous. This is a pattern.

BankPlus in 2020 in Alabama based on its disparate marketing made 71 mortgage loans to whites, with four denials to whites -- while making NO loans to African Americans.

Perhaps most relevant, BankPlus is disparate in the state it is trying to make this acquisition to impose and expand its practices. South State Bank NA in 2020 in Louisiana based on its disparate marketing made 24 mortgage loans to whites, with eight denials to whites -- while making as in Alabama N) loans to African Americans. FFW and Inner City Press have been deeply concerned about the rush by the FDIC to rubber-stamp mergers by redliners. This has been killing the Community Reinvestment Act and we timely request public hearings."



Meanwhile, the FDIC wrote:

"Matthew Lee, Esquire Executive Director Inner City Press/Fair Finance Watch Dear Mr. Lee: We are writing to inform you that the FDIC approved Investors Bank's application to acquire eight branches from Berkshire Bank. As part of the application review process, we investigated the issues you raised in your e-mail dated January 19, 2019... The Bank will develop and Board approve an Action Plan within 60 days of the effective date of this Order to ensure that its home mortgage lending adequately addresses the credit needs of all segments of its market areas. The Action Plan should include, at a minimum, the following: a. The Bank will regularly monitor application and origination activity of home mortgage loans in majority-minority census tracts and from Blacks throughout the Bank's assessment areas. b. The Bank will ensure marketing and outreach efforts are inclusive of all communities, including minority communities within all the Bank's assessment areas. The marketing and outreach efforts should focus on home mortgage product awareness. Marketing activities should use

materials and media that reflect the racial and ethnic composition of the targeted communities. The Bank should also have specific advertising and outreach goals, and the results of these efforts should be documented, monitored, and evaluated for effectiveness. 5. Upon Board approval of this Order, the Bank will provide a copy of the signed Order to the FDIC's New York Regional Office within 30 days. 6. Upon Board approval of such Action Plan, the Bank will provide a copy of the Plan to the FDIC's New York Regional Office. 7. The Bank will provide the FDIC's New York Regional Office with quarterly updates detailing its progress in meeting the goals listed in the Action Plan."

So what's up with the FDIC, on BankPlus' disparities?

Watch this site.

Your support means a lot. As little as \$5 a month helps keep us going and grants you access to exclusive bonus material on our Patreon page. [Click here to become a patron.](#)

Feedback: Box 20047, Dag Hammarskjold Station NY NY 10017

Other, earlier Inner City Press are listed [here](#), and some are available in the ProQuest service, and now on Lexis-Nexis.

Copyright 2006-2021 Inner City Press, Inc. To request reprint or other permission, e-contact Editorial [at] innercitypress.com

From: Caitlin Brooking <Caitlin@refilljackson.org>
Sent: Monday, April 18, 2022 1:52 PM
To: Jade Cowan <JadeCowan@BankPlus.net>
Cc: David Johnson, Sr. <DavidJohnson@BankPlus.net>
Subject: (External) Thank you Jade!!

Hi Jade:

Just wanted to say thank you so much for helping Devin get cashier's checks for our members' apartment application fees last week. Devin told me you came out on your day off to help him, and I really, really appreciate it - he had been struggling all week to try to secure housing for these two members, who are currently homeless. You really made a big difference to them, to him, and to me!

With gratitude,

█ n



www.refilljackson.org
[Donate today!](#)

November 6, 2023

Email: [Redacted]

To Whom it May Concern:

It has recently come to my attention that the BankPlus branch at 6410 Watkins Drive is slated to close sometime within the month of December. If I may, I would like to request that this branch stay open on the basis that it is located around several neighborhoods. Many of these neighborhoods contain senior citizen residents who prefer the face-to-face interactions that this bank provides rather than mobile banking. Particularly, the neighborhood of Lakeover consists of retirees, many of whom bank with BankPlus as their primary bank of choice. Removing this branch from the community would provide an immense disservice to the patrons of the bank, especially for those unable to use mobile banking. Additionally, this bank is situated off of the Interstate of I-220 and is located next to the Southern Farm Bureau Insurance Company, placing it in an ideal location for passerby with a substantial amount of daily traffic. Because of its convenient location and accessibility from the Interstate, it is often considered a prime choice over other branches that may be more secluded or those in overcrowded areas.

I am a frequent and longtime patron of this branch. From both my many encounters at this bank and the many times that I pass by, I can testify that this branch always has someone using the many services that the bank provides, even after hours with use of the ATM. Furthermore, the staff at this bank are wonderful. They are always kind and courteous whenever I walk into the bank and provide me with excellent service. In particular, the branch manager, Clarissa Hickman, has helped me numerous times with financial and banking matters and I know I am in good hands anytime I walk into that branch.

I humbly request that BankPlus may keep this branch open and, if necessary, consider closing another branch that may not have the same amount of traction or patron support that this branch has.

Sincerely,

[Redacted Signature]



November 10, 2023



I received a copy of your letter regarding BankPlus' decision to close our Watkins Drive branch and appreciate you taking the time to express your concerns. While it is always a difficult decision to close any branch, I want to assure you BankPlus remains committed to serving customers who have frequented this location.

At BankPlus, we continually monitor our branch network for effectiveness in delivery and use of resources. In several of our branch locations, business traffic and volume have decreased. The Watkins Drive branch happens to be one of those locations.

Following the closure, BankPlus will continue to operate a broad network of offices across the greater Jackson metro area. This includes three offices that are a short distance from the Watkins Drive address, all readily accessible and convenient to retail areas frequented by many Jackson residents:

730 Adkins Boulevard, Jackson, MS 39211

510 Hwy 51 North, Ridgeland, MS 39157

1010 Highland Colony Parkway, Ridgeland, MS 39157

In addition to these and other branches we will continue to operate, BankPlus has invested in convenience-based technology to help our customers bank and conduct transactions online and through personal mobile devices, and through Interactive Teller Machines (ITM's) that allow customers to conduct transactions with a live teller from 7:00 a.m. to 7:00 p.m. on weekdays and from 9:00 am. to 1:00 p.m. on Saturdays.

BankPlus appreciates your business and we hope you will give us the opportunity to continue to earn your business and meet your financial services needs. Thank you again for expressing your concerns and for giving me the opportunity to better explain this decision.

Sincerely,

Eugene F. (Jack) Webb
President & Chief Executive Officer

Town of Pickens

September 12, 2023

RE: Pickens Branch Bank Plus Closing

To Bank Plus CEO and Board of Directors,

Don't leave Pickens, Mississippi! This is the very earnest request of the residents of Pickens who recently received notice that Bank Plus, our only banking institution, would be closing on December 15, 2023.

While we understand that many large banks are leaning more toward innovation as a focus of its own financial wellness, we do not believe that aligns with the values of Bank Plus as is stated and as we have known it. Bank Plus has made a promise that we are asking you to keep. Your promise to remember "not only where [you] came from, but also where [you] will be tomorrow". Bank Plus has operated as a member of the Pickens community for many years. We need you to still be with us tomorrow. By your own admission your growth and success have been achieved by serving small and rural communities like Pickens.

Bank Plus has listed as a core value community development and a commitment to meet the needs of low-to-moderate income residents. The residents of Pickens and surrounding areas desperately need a banking institution to support the economic development already underway. Many efforts are being made to improve the town, grow the population, and bring more development to the area. Within the next six months several major unprecedented projects will begin. These projects will include:

- Construction on the Yazoo Street Bridge.
- Smart water meters to be installed at all homes.
- Water and sewer infrastructure will be overhauled.
- Two new lift stations will be installed for the sewer system.
- New streets installed after water system repair.
- New subdivision offering affordable housing to attract Nissan and Amazon employees as well as Holmes County educators to move into Pickens.

These projects are just the beginning of the changes coming to Pickens. With the Main Street and Waterfront Projects being planned with bond anticipation, these two initiatives alone potentially can bring in millions of dollars. Without Bank Plus's presence in our community the efforts to revitalize our town and its burgeoning economic development efforts will be halted

Bank Plus states that it is "committed to improving the places where we live and work". Leaving Pickens will do just the opposite at a critical time when economic development opportunities are on the horizon. Leaving Pickens will strip it of its social capital, make the hardworking citizens the target of predatory financial products and services, and deny families, many who have banked with Bank Plus for generations the financial services that help to build long-term wealth. Technologies are no substitute for the real relationship between Bank Plus and the citizens of Pickens.

When Bank Plus established a branch here it submitted a certificate that the public convenience and necessity will be promoted by its establishment. The people of Pickens did not oppose your assertion. Your continued presence provides the public convenience and necessity that is critical in rural towns like Pickens.

Your decision to close could not have been informed by citizens who have been loyal to Bank Plus and who have trusted you to be loyal to them. If you had asked, they would have told you how fortunate they have been to have a community bank to provide credit and other needed financial products. They would have told you how important it is that they are able to bank locally with people they trust. They would point out local public projects that wouldn't have happened without community bank support. Since you didn't ask, please know that we are telling you now.

Don't close the Pickens Branch of Bank Plus. Your physical presence is vital to the Town's future.

Feel free to contact me if you want to speak further about my initiatives for town growth at 601-503-4115.

On behalf of the citizens of Pickens and the Board of Aldermen,

Sincerely,

[Redacted signature]

[Redacted signature]

Town of Pickens



September 25, 2023

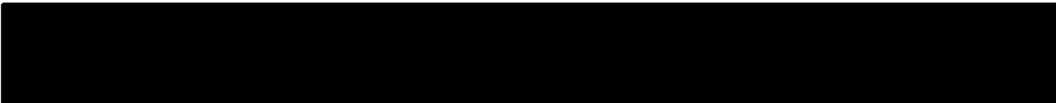
RE: Pickens Branch Bank Plus Closing

To Bank Plus CEO and Board of Directors,

Don't leave Pickens, Mississippi! This is the very earnest request of the residents of Pickens who recently received notice that Bank Plus, our only banking institution, would be closing on December 15, 2023.

While we understand that many large banks are leaning more toward innovation as a focus of its own financial wellness, we do not believe that aligns with the values of Bank Plus as is stated and as we have known it. Bank Plus has made a promise that we are asking you to keep. Your promise to remember "not only where [you] came from, but also where [you] will be tomorrow". Bank Plus has operated as a member of the Pickens community for many years. We need you to still be with us tomorrow. By your own admission your growth and success have been achieved by serving small and rural communities like Pickens.

Bank Plus has listed as a core value community development and a commitment to meet the needs of low-to-moderate income residents. The residents of Pickens and surrounding areas desperately need a banking institution to support the economic development already underway. Many efforts are being made to improve the town, grow the population, and bring more development to the area. Within the next six months several major unprecedented projects will begin. These projects will include:

- Construction on the Yazoo Street Bridge.
 - Smart water meters to be installed at all homes.
 - Water and sewer infrastructure will be overhauled.
 - Two new lift stations will be installed for the sewer system.
 - New streets installed after water system repair.
 - New subdivision offering affordable housing to attract Nissan and Amazon employees as well as Holmes County educators to move into Pickens.
- 

These projects are just the beginning of the changes coming to Pickens. With the Main Street and Waterfront Projects being planned with bond anticipation, these two initiatives alone potentially can bring in millions of dollars. Without Bank Plus's presence in our community the efforts to revitalize our town and its burgeoning economic development efforts will be halted

Bank Plus states that it is "committed to improving the places where we live and work". Leaving Pickens will do just the opposite at a critical time when economic development opportunities are on the horizon. Leaving Pickens will strip it of its social capital, make the hardworking citizens the target of predatory financial products and services, and deny families, many who have banked with Bank Plus for generations the financial services that help to build long-term wealth. Technologies are no substitute for the real relationship between Bank Plus and the citizens of Pickens.

When Bank Plus established a branch here it submitted a certificate that the public convenience and necessity will be promoted by its establishment. The people of Pickens did not oppose your assertion. Your continued presence provides the public convenience and necessity that is critical in rural towns like Pickens.

Your decision to close could not have been informed by citizens who have been loyal to Bank Plus and who have trusted you to be loyal to them. If you had asked, they would have told you how fortunate they have been to have a community bank to provide credit and other needed financial products. They would have told you how important it is that they are able to bank locally with people they trust. They would point out local public projects that wouldn't have happened without community bank support. Since you didn't ask, please know that we are telling you now.

Don't close the Pickens Branch of Bank Plus. Your physical presence is vital to the Town's future.

Feel free to contact me if you want to speak further about my initiatives for town growth at 601-503-4115.

On behalf of the citizens of Pickens and the Board of Aldermen,

Sincerely,

[REDACTED]

[REDACTED]

Form letter



September 28, 2023

[REDACTED]

I appreciate you taking the time to express your concerns about BankPlus' decision to close our Pickens location.

While it is always a difficult decision to close any branch location, I want to assure you BankPlus remains committed to serving our customers in Pickens and Holmes County. At BankPlus, we continually monitor our branch network for effectiveness in delivery and use of resources. In several of our branch locations, business traffic and volume have decreased. The Pickens branch happens to be one of those locations. Over the last several years, BankPlus has invested in convenience-based technology to help our customers bank and conduct transactions online, through Interactive Teller Machines (ITM's) and through personal mobile devices.

When the Pickens branch closes in December of 2023, BankPlus will install an ITM. This interactive technology is in use in many of our larger markets and allows customers to conduct transactions with a live teller from 7:00 a.m. to 7:00 p.m. on weekdays and from 9:00 am. to 1:00 p.m. on Saturdays. The new ITM in Pickens will expand service to customers by 28 hours per week. Additionally, BankPlus remains committed to serving the future deposit and credit needs of the community with three BankPlus locations in Holmes County in Lexington, Tchula, and Durant as well as a nearby location in Canton.

Thank you again for expressing your concerns and for giving me the opportunity to better explain this decision.

Sincerely,

Jack Webb

President & Chief Executive Officer