

RESPONSE
PRESENTED TO

CITY OF SAINT PAUL, MN

September 14, 2018

Jennifer Vucinovich
651-466-8750
jennifer.vucinovich@usbank.com

Banking Presence

1. Number of customers with account addresses in Saint Paul

76,646 customers have account addresses in Saint Paul.

2. Number and address of banking locations in Saint Paul

a. Conventional banking branches

Eight (8) Traditional Branches

Highland Park	711 Cleveland Ave S	Saint Paul	MN	55116
Grand	1071 Grand Ave	Saint Paul	MN	55105
Midway	2383 University Ave W	Saint Paul	MN	55114
East St. Paul	1000 Payne Ave	Saint Paul	MN	55130
Battle Creek	1959 Burns Ave	Saint Paul	MN	55119
U.S. Bank St. Paul Center	101 5th St E	Saint Paul	MN	55101
Oakdale	7620 10th St N	Saint Paul	MN	55128
West Side Flats	60 Livingston	Saint Paul	MN	55107

b. Retail location branches

Two (2) Retail/Other Location Branches

3M North	3M Center #275	Saint Paul	MN	55144
3M	3M Center Bldg 222-01	Saint Paul	MN	55144

c. Automated teller machines

Fifty-two (52) City of Saint Paul ATMs

<u>ATMs</u>	<u>Address</u>	<u>City</u>	<u>State</u>	<u>ZIP</u>
1	1000 Payne Avenue	Saint Paul	MN	55130
3	101 East 5th Street	Saint Paul	MN	55101
3	1071 Grand Avenue	Saint Paul	MN	55105
1	120 West Kellogg Boulevard	Saint Paul	MN	55102
1	1200 Energy Park Drive	Saint Paul	MN	55108
1	1345 Marshall Avenue	Saint Paul	MN	55104
1	1400 Arcade Street	Saint Paul	MN	55106
1	1444 Minnehaha Avenue East	Saint Paul	MN	55106
1	1537 Englewood Avenue	Saint Paul	MN	55104
1	1600 Grand Avenue	Saint Paul	MN	55105
1	1608 Rice Street	Saint Paul	MN	55117
1	180 East 5th Street	Saint Paul	MN	55101
1	1959 Burns Avenue	Saint Paul	MN	55119
1	200 University Avenue East	Saint Paul	MN	55101
1	200 Wabasha Street South	Saint Paul	MN	55107
2	2115 Summit Avenue	Saint Paul	MN	55105
1	2199 University Avenue	Saint Paul	MN	55114
1	2383 University Avenue West	Saint Paul	MN	55114
1	281 North Snelling Avenue	Saint Paul	MN	55104

Fifty-two (52) City of Saint Paul ATMs

1	3900 Bethel Drive	Saint Paul	MN	55112
1	3M Center - Building 222-01	Saint Paul	MN	55144
1	3M Center - Building 275	Saint Paul	MN	55144
1	400 Robert Street North	Saint Paul	MN	55101
15	4300 Glumack Drive	Saint Paul	MN	55111
1	500 7th Street East	Saint Paul	MN	55101
1	600 Snelling Avenue North	Saint Paul	MN	55104
1	629 Rice Street	Saint Paul	MN	55103
2	711 Cleveland Avenue South	Saint Paul	MN	55116
1	721 Arcade Street	Saint Paul	MN	55106
1	743 Century Avenue North	Saint Paul	MN	55119
1	850 Grand Avenue	Saint Paul	MN	55105
1	965 Sibley Memorial Highway	Saint Paul	MN	55118

52

3. Number and address of banking locations in low/moderate income census tracts within Saint Paul

a. Conventional banking branches

Six (6) Conventional Branches in Saint Paul

Branch Name	Street Address	City	Zip Code
Battle Creek	1959 Burns Ave	Saint Paul	55119
East St. Paul	1000 Payne Ave	Saint Paul	55130
Midway	2383 University Ave W	Saint Paul	55114
U.S. Bank St. Paul Center	101 5th St E	Saint Paul	55101
West Side Flats	60 Livingston Ave	Saint Paul	55107

b. Retail location branches

Two (2) Retail/Other Location Branches

3M North Office	3M Center Building # 275	Saint Paul	55144
3M	3M Center Building 222-01	Saint Paul	55144

c. Automated teller machines

ATMS	Address	City	ZIP
1	1000 Payne Avenue	Saint Paul	55130
1	1200 Energy Park Drive	Saint Paul	55108
1	1345 Marshall Avenue	Saint Paul	55104
1	1444 Minnehaha Avenue East	Saint Paul	55106
1	1608 Rice Street	Saint Paul	55117
1	1959 Burns Avenue	Saint Paul	55119
1	200 University Avenue East	Saint Paul	55101
1	200 Wabasha Street South	Saint Paul	55107
1	2199 University Avenue West	Saint Paul	55114
1	2383 University Avenue West	Saint Paul	55114

1	3M Center - Building 222-01	Saint Paul	55144
1	3M Center – Building 275	Saint Paul	55144
1	400 Robert Street North	Saint Paul	55101
1	500 7 th Street East	Saint Paul	55101
1	60 Livingston Avenue	Saint Paul	55107
1	629 Rice Street	Saint Paul	55103
1	721 Arcade Street	Saint Paul	55106
1	743 Century Avenue North	Saint Paul	55119
18			

4. Number of employees working in Saint Paul

3,287 employees

5. Number of employees with residential addresses in Saint Paul

1,281 employees

Consumer Banking

6. List the monthly fee that a consumer pays to maintain the type of bank account that is most frequently used by consumers in Minnesota

Easy Checking is our entry level consumer checking account. It has a monthly maintenance fee of \$6.95 (\$2 fee applies for paper statements). The monthly maintenance fee is waived when the consumer has combined monthly direct deposits of at least \$1,000 or maintains an average account balance of \$1,500 or more per statement period.

In addition, customers can access our “[Simple Snapshot](https://www.usbank.com/bank-accounts/checking-accounts/compare-checking-accounts.aspx)” summary of account fees on our website. The specific address is <https://www.usbank.com/bank-accounts/checking-accounts/compare-checking-accounts.aspx>. From there, a consumer may select any checking account to learn more and then select the account’s Simple Snapshot located in the Pricing and Features section on the lower half of the page. The Simple Snapshots include an easy to read summary of the most common fees related to a consumer checking account and has been approved by the Pew Research Center.

7. List other fees associated with this bank account

A comprehensive list of fees is included in our Consumer Pricing Brochure (Attachment B1).

8. Identify business products that are designed for the following consumers:

a. Unbanked or under-banked

Helping to serve the unbanked and under-banked, the Safe Debit Account is an affordable bank account (following Bank On National Account Standards) with no checks and no overdraft fees. Other benefits include: a U.S. Bank debit card, no-fee transactions at U.S. Bank ATMs, Online/Mobile Banking access, mobile check deposit, and bill pay; all for a monthly maintenance fee of only \$4.95.

b. Elderly

Consumers who are 65 or older qualify for our Premium Checking account with no monthly maintenance fee. The Premium Checking account is our best single-service consumer checking account that features benefits such as free non-U.S. Bank ATM transactions as well as others. Seniors who qualify for one of

our Checking Package accounts can still receive “senior benefits” such as free U.S. Bank logo checks on the initial check order, and 50% discount on any re-orders.

c. Youth

Youth (as young as 14 with an adult co-signer) and students are eligible for our Student Checking product, which features no monthly maintenance fee (\$2 if paper statements are selected) as well as the first order of U.S. Bank logo checks for free and no U.S. Bank fee for up to their first 4 non-U.S. Bank ATM transactions per month. Youth and other students who qualify for one of our Checking Package accounts can still receive “Student Benefits” such as their first order of U.S. Bank logo checks for free and no U.S. Bank fee for their first 4 non-U.S. Bank ATM transactions per month.

d. Low income

Please refer to our response to 8a above: Unbanked or under-banked.

e. No or poor credit

For short term and/or revolving credit needs, U.S. Bank offers a secured Visa credit card. The card offers a limit as low as \$300 (secured by a consumer savings account with a \$300 deposit) that allows a customer to establish or re-establish credit. If the account is managed responsibly and consistently for 12 months, the customer may be eligible to move to an unsecured card.

U.S. Bank Home Mortgage also participates in programs (subject to availability and qualifications) for new home buyers or buyers with challenged credit.

9. Describe your success in number and dollar amount for these target groups.

While this information is not available at the Saint Paul market level, in July 2018, U.S. Bank had 39,342 Safe Debit accounts, 648,142 accounts for seniors, and 913,413 student checking accounts.

Consumer Lending

10. Small Business Administration ranking

**Minnesota SBA District Office
As of 06/30/2018**

Unit Rank	Minnesota	Unit Volume
1	Wells Fargo Bank, National Association	98
2	U.S. Bancorp	97
3	KleinBank	51
4	Sunrise Banks, National Association	48
5	21st Century Bank	42
6	BankVista	40
7	Venture Bank	34
8	Frandsen Bank & Trust	27
9	Associated Bank, National Association	26
10	Highland Bank	25

Volume Rank	Minnesota	Dollar Volume
1	Wells Fargo Bank, National Association	\$38,521,100
2	Venture Bank	\$15,670,500
3	BankVista	\$14,614,100
4	Platinum Bank	\$13,183,000
5	U.S. Bancorp	\$12,780,400
6	Old National Bank	\$11,864,900
7	Live Oak Banking Company	\$10,608,000
8	Bremer Bank, National Association	\$10,317,000
9	21st Century Bank	\$9,990,000
10	Sunrise Banks, National Association	\$8,511,300

11. Number and dollar total of commercial loans to businesses with revenues of \$1 million or more in Saint Paul.

U.S. Bank provides small business lending data at the county level only. U.S. Bank reported 558 loans totaling \$32,728,000 in Ramsey County during 2017. These are CRA reportable loans only.

*** Note: During 2017, U.S. Bank reported 98 CRA small business loans totaling \$9,585,000 with unknown gross annual revenues in Ramsey County.

12. Number and dollar total of commercial loans to business with revenues less than \$1 million in Saint Paul.

U.S. Bank provides small business lending data at the county level only. U.S. Bank reported 1,657 loans totaling \$24,163,000 in Ramsey County during 2017. These are CRA reportable loans only.

*** Note: During 2017, U.S. Bank reported 98 CRA small business loans totaling \$9,585,000 with unknown gross annual revenues in Ramsey County.

13. Number and dollar total of commercial loan amounts of \$250,000 or less in Saint Paul.

U.S. Bank provides small business lending data at the county level only. U.S. Bank reported 2,247 loans totaling \$28,556,000 in Ramsey County during 2017.

14. Number and dollar total of commercial loan amounts of \$250,001 - \$1,000,000 in Saint Paul.

U.S. Bank provides small business lending data at the county level only. U.S. Bank reported 66 loans totaling \$37,920,000 in Ramsey County during 2017.

15. Number and dollar total of commercial loans to minority-owned, women-owned businesses in Saint Paul

Regulation B prohibits the collection of race, ethnicity, and gender information on small business loans.

Home Loan Origination

16. Provide the past two years data submitted in HMDA Disclosure Reports to FFIEC for Disclosure

Tables 1 through 11 available at this website:

<http://www.ffiec.gov/hmdaadwebreport/DisWelcome.aspx>

Responses should be aggregated to include the information for the Bank and any subsidiaries or affiliates of the Bank

Please see attachments – U.S. Bank HMDA 2016 and U.S. Bank HMDA 2017.

Home Loan Servicing

17. Please complete the following table (include race, age and gender demographics):

U.S. Bank does not capture data for race, age, and gender on serviced loans. For this reason we cannot provide you these details.

	As of 12/31/2016	As of 12/31/2017*
# of Home Loans Serviced in Saint Paul	17,660 home loans	10,524 home loans
Total Outstanding Principal of those Home Loans	\$2.15 billion	\$1.2 billion
% of Loans in some stage of Non-Payment or Default	4.33%	4.27%

*All 2017 data in this table and included in items 22 and 23 are limited to City of Saint Paul census tracts only.

Home Loan Modification and Response to Foreclosure Crisis

18. Provide for the City of Saint Paul, by census tract, the information required on the mortgage loan disclosure statement pursuant to the Home Mortgage Disclosure Act, 12 U.S. C. Section 2801 et seq. and laws amendatory thereof and supplementary thereto (“HMDA”), for the previous fiscal year.

Please see attachment – U.S. Bank Saint Paul HMDA 2017.

19. Provide details on your institution’s disposition policy for foreclosed vacant and abandoned residential property including options for re-purchase, rehabilitation, and re- occupation.

Disposition policy:

Properties will generally be sold by realtor liquidation, but Supplier may utilize auctions, bulk sales, and donations (with U.S. Bank approval).

Supplier will regularly analyze the portfolio and look for properties that may be good donation candidates and will bring the properties to the attention of U.S. Bank to gain approval for donation. Once approved for donation, Supplier will attempt to donate to nonprofit entities and land banks, unless otherwise directed by U.S. Bank.

Re-purchases:

U.S. Bank does not allow re-purchases.


Re-Occupation:

Once a home is deemed vacant, abandoned, and secured, U.S. Bank does not allow re-occupation of the REO.

Rehabilitation:

U.S. Bank policy ensures each REO is maintained in a presentable, marketable, safe and secure manner, and that it adheres to any state and local requirements. The REO Department will ensure that maintenance is scheduled to include regular lawn service, annual winterization or de-winterization, emergency securing, debris removal, and snow removal, as appropriate. Blighted conditions are addressed immediately and all properties are required to have curb appeal equal to or better than the surrounding homes.

All REO properties are inspected on a timely basis by the assigned property management company or designee. This is done to ensure maintenance and repair issues are addressed immediately and to check occupancy status.



20. Provide a narrative on the Bank's participation in foreclosure prevention and mitigation of negative effects on neighborhoods in Saint Paul, both unilaterally and through community collaboration.

U.S. Bank takes proactive measures to prevent foreclosures. If a mortgage payment is not made by the third day after it is due, U.S. Bank begins its attempts to reach the owner by phone and by mail. An attempt is made every three days until the owner is reached. The goal is to talk to the owner to understand why payments are not being made, and to determine if the owner has the ability to make payment as well as what options are available and feasible to prevent the owner from going into foreclosure.

U.S. Bank supports The Minnesota Homeownership Center, which provides statewide counseling support to individuals and organizations that are experiencing difficulties paying their mortgages.

- The Center is located in the East Saint Paul U.S. Bank Branch
- U.S. Bank employee serves on the Board of Directors
- The Center created the Homeownership Opportunity Alliance, whose goal is to increase home ownership by diverse populations. U.S. Bank employee serves on this Alliance committee and is actively engaged on the Community Development committee
- U.S. Bank has nine CRA mortgage officers that cover the Twin Cities and are actively engaged with in the community and with local non-profits across the metro area.
- U.S. Bank provides operating support and sponsorship funding annually.

Additionally, we are currently partnering with the following housing organizations that serve St. Paul: Dayton's Bluff Neighborhood Housing Services, NeighborWorks Home Partners, Rondo Community Land Trust, Commonbond, Great Minnesota Housing Fund, Minnesota Housing Finance Agency, Project for Pride in Living, AEON, Habitat for Humanity, Hmong American Partnership and African Economic Development Solutions.

U.S. Bank created the Community Restoration Fund. Through this initiative, U.S. Bank provided two nonprofit affordable housing developers with \$250,000 each at 0% interest, for use in Saint Paul to purchase vacant and foreclosed homes, renovate and sell the single-family homes, and revolve the funds. The program has resulted in 27 properties purchased and renovated and 23 sold to owner occupants. The program was extended in late 2015 for another three years.

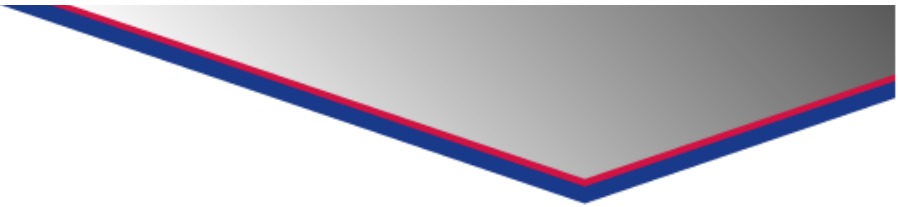
21. Provide a narrative on the Bank's participation in any national, multi-party settlements, consent agreements, and mitigation initiatives in response to the foreclosure crisis since 2008.

U.S. Bank's involvement in consent agreements, settlements, and mitigation alternatives, if any, are the result of claims and issues directly attributable to U.S. Bank. Moreover, U.S. Bank's contractual, legal, and regulatory obligations often prohibit the disclosure of information regarding consent agreements, settlements, and mitigation alternatives.

22. Provide the number of real estate-owned properties by census tract of the Bank on December 31 for each of the year's 2008-through current year in Saint Paul.

U.S. Bank had a total of 15 real estate-owned properties in Saint Paul census tracts on December 31, 2017. U.S. Bank had 63 real estate-owned properties in MSA #33460 on December 31, 2016. Please see Attachment B, which includes the number of real estate-owned properties by census tract for 2011 through 2015. Prior to 2011, U.S. Bank did not capture this data.

23. Provide information related to loan modifications and foreclosures on residential mortgages in the city of Saint Paul, which shall include data as of the end of the financial institution's previous fiscal year on the:

- 
- a. **percentage of residential mortgages that are current or missed only one (1) payment;**
97.78%
 - b. **percentage that are seriously delinquent (sixty (60)+ days late);**
2.22%
 - c. **percentage that are actively engaged to find a workout option;**
0.41%
 - d. **number of customers that have completed or started a workout arrangement;**
114
 - e. **number of customers that have completed a workout arrangement and the number of workout arrangement that resulted in each of the following outcomes:**
A total of 71 customers completed workout arrangements in 2017.
 - 1. **modification to lower monthly mortgage payments;**
45
 - 2. **principal reduction to reduce the mortgage amount owed;**
1
 - 3. **modification or reduction on the second mortgage;**
4
 - 4. **mortgage payments reduced or suspended during period of unemployment;**
0
 - 5. **bankruptcy;**
41
 - 6. **short sale;**
1
 - 7. **deed in lieu of foreclosure;**
0
 - 8. **other**
0
 - f. **number of the financial institution’s real estate-owned (“REO”) properties for sale;**
25
 - g. **number of completed foreclosure sales; and**
20
 - h. **number of the financial institution’s REO properties donated or discounted to nonprofits or the city.**
0



Corporate Philanthropy

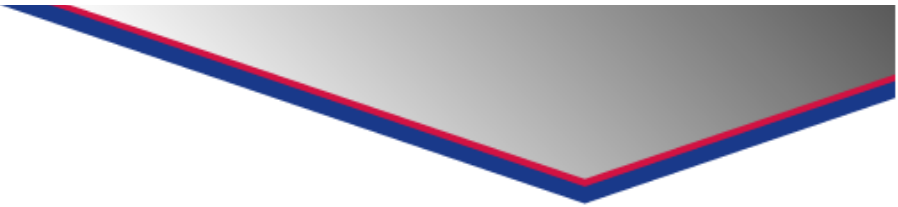
24. List cash grants to non-profit organizations in Saint Paul

Accessible Space, Inc.
African Economic Development Solutions
Asian Economic Development Association
Boys and Girls Clubs of the Twin Cities
Breakthrough Twin Cities
College Possible
Como Friends
Comunidades Latinas Unidas en Servicio, Inc.
Dayton's Bluff Neighborhood Housing Services, Inc.
Goodwill/Easter Seals Minnesota
Joy of the People Foundation
Local Initiatives Support Corporation - Twin Cities
Minnesota Children's Museum
Minnesota Elder Justice Center
Minnesota Historical Society
Minnesota Home Ownership Center
Minnesota Private College Fund
Minnesota Public Radio
Neighborhood Development Center Inc.
Neighborhood House
Ordway Center for the Performing Arts
Penumbra Theatre Company, Inc.
Prepare and Prosper
Rondo Community Land Trust
Science Museum of Minnesota
St. Anne's Community Development Corporation
St. Paul Chamber Orchestra
St. Paul Urban Tennis Program
The Sanneh Foundation
Theater Mu
Transit for Livable Communities
Twin Cities Habitat for Humanity
Twin Cities Public Television, Inc.

25. List cash grants to partners providing financial literacy, retirement and banking products education and training in Saint Paul

The following list of organizations are ones we fund through foundation grants which provide financial literacy education (youth, seniors, first time homebuyer, and small business):

African American Leadership Forum
African Development Center
African Economic Development Solutions
Asian Economic Development Association
BestPrep
Community Reinvestment Fund
Emerge Community Development
Junior Achievement of The Upper Midwest
Latino Economic Development Center



Metropolitan Consortium of Community Developers
Metropolitan Economic Development Association
Minnesota Elder Justice Center
Minnesota Home Ownership Center
Neighborhood Development Center Inc.
Nonprofits Assistance Fund
Northside Economic Opportunity Network
Prepare and Prosper
Women Venture

26. List volunteer and in-kind giving to non-profit organizations in Saint Paul

U.S. Bank encourages and supports employee community involvement through the U.S. Bank Volunteers program where we provide access to benefits and events that support both community-sponsored volunteer activities and individual interests. Over the last three years, over 6,500 U.S. Bank employees in the Twin Cities shared their skills and knowledge with our communities through over 128,000 hours of volunteer service with a variety of nonprofit organizations. Additional information about U.S. Bank Volunteers program can be found at our Community/Volunteerism page:
<https://www.usbank.com/community/volunteerism.aspx>.

U.S. Bank provides the following in-kind donation to a nonprofit organization serving Saint Paul:

- U.S. Bank took its existing first floor conference space and converted it to a bank of teller windows dedicated solely for Goodwill Easterseals Teller Training Program at the branch at 2383 University Avenue in Saint Paul. This 12 week program provides entry level training to people who desire careers in the financial industry. Goodwill Easterseals offers this program every spring and fall.

U.S. Bank volunteers with the following nonprofits and organizations:

- Latino Economic Development Center, Neighborhood Development Center and the African Development Center each partnered with U.S. Bank to offer Small Business Speed Coaching events to their small business clients in the Twin Cities. U.S. Bank sponsored the events which provided small business owners the opportunity to spend time with various experts who can help with legal, accounting, banking, marketing, personnel, licensing, social media and web development along with other issues to become stronger businesses and providers in the community.
- Prepare and Prosper – Over thirty U.S. Bank employees provide an average of 30 or more hours of volunteer time each to prepare tax returns for low income Saint Paul residents during the tax season.
- Hmong American Partnership, Community Neighborhood Housing Services, NeDA, African Development Center and 1st Home Network are organizations U.S. Bank partners with to teach first time homebuyer education to people who want to buy their first home. Community Loan Officers conducted 36 classes last year in partnership with these and other nonprofits who serve Twin City residents.
- In addition, U.S. Bank provided funding to Minnesota organizations that provide services within Saint Paul:
 - Latino Economic Development Center – reaches Latino business owners in Saint Paul and provides small business education.
 - Metropolitan Consortium of Community Developers – reaches small business owners in the Twin Cities and provides small business education and technical assistance.
 - Project for Pride in Living – builds and owns affordable housing units in the Twin Cities and provides financial education and job training services to residents.

- Aeon – builds and owns affordable housing units in Saint Paul.
- CommonBond Communities – builds and owns affordable housing units in Saint Paul and provides services through their Advantage Centers.
- Women Venture – reaches new business owners in Saint Paul and provides financial education and technical assistance for small business owners.
- Local Initiative Support Corporation – providing technical assistance and financing for complex and challenging developments.
- African Development Center – providing first time homebuyer education in addition to technical assistance, education and financing for small businesses.
- Minnesota Homeownership Center – providing funding and first time homebuyer curriculum and training for homeownership counseling agencies.
- Greater Metropolitan Housing Corporation – partnering with Frogtown CDC to identify, purchase, and renovate vacant and foreclosed homes in Promise Neighborhood for resale to owner occupants.

Community Reinvestment Act Rating

27. List date and result of Bank’s most recent CRA rating

March 31, 2012

Overall CRA Rating: Satisfactory

Performance Levels	U.S. Bank National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

U.S. Bank earned Outstanding ratings in the Lending, Investment, and Service Tests in the Minneapolis-Saint Paul-Bloomington Multistate MSA during the CRA exam. The Bank’s overall CRA rating was Outstanding for this assessment area.

28. List date of Bank’s next CRA rating

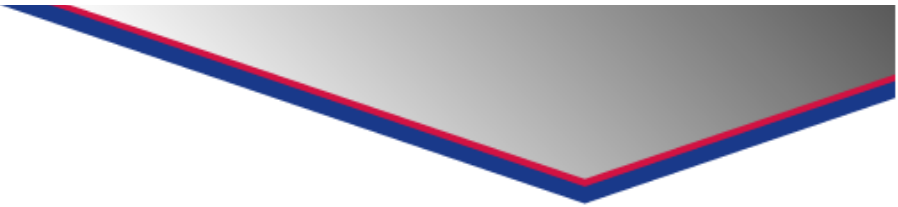
The most recent CRA rating was made public on July 1, 2016. U.S. Bank’s next CRA exam covers 2012-2015; we do not have a date for the release of this CRA performance evaluation.

29. Provide copies of the two most recent CRA exams

The most recent copy of our "Community Reinvestment Act Evaluation" can be found on our website <https://www.usbank.com/community/cra-performance-evaluation.html>

30. Provide a Community Reinvestment Plan describing current and proposed initiatives to address the following services, products and areas of activity:

U.S. Bank is a nationally-chartered financial institution that is supervised and regulated exclusively by the federal government and is subject to a comprehensive body of federal consumer protection statutes and regulations, including the Community Reinvestment Act. U.S. Bank is committed to offering lending,



financing and banking opportunities to low- and moderate-income communities as part of the bank's responsibilities under the CRA. U.S. Bank is pleased to provide information for public review under the CRA, information that is available on the bank's website at <https://www.usbank.com/community/reinvestment-act.html>. As U.S. Bank will continue to provide this information on a regular basis, the bank respectfully declines the city's request for a specific CRA plan. Please see the attached document that describes U.S. Bank's products and services in Minneapolis.

- (a) Affordable check cashing and other transactional services used by consumers with limited banking accounts or experience;
- (b) Small consumer loans, including those that serve as an alternative to payday loans;
- (c) Participation in city sponsored neighborhood development programs;
- (d) Efforts to support homeownership education and foreclosure prevention education and counseling;
- (e) Equitable contributions to community based non-profit organizations in the city that engage in neighborhood development.
- (f) Provision of full service banking in city neighborhoods, including branches, services and technologies; and
- (g) Plans to provide and market loans and investment products that help create loans throughout the city including in low and moderate income neighborhoods and to low and moderate income consumers.

Investment Banks

Investment banks shall not be subject to the disclosure requirements above as long as they seek or perform only investment banking business for the City. Banks that provide the City with underwriting services including the buying and selling of stocks, bonds and other securities and other debt related services shall provide the following.

A statement of the corporate citizenship which shall include but not be limited to:

- (a) Participation in charitable programs or scholarships within the City during the year immediately predating the filing
- (b) Internal policies regarding utilization of subcontractors which are designated as "women owned", "minority owned", or "disabled" business enterprises