



## 2022 Public Comment Letters

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High-Risk: ECR - goes to next state in 79 hours - Assigned to [CLF] ECR Team NEW

6/10

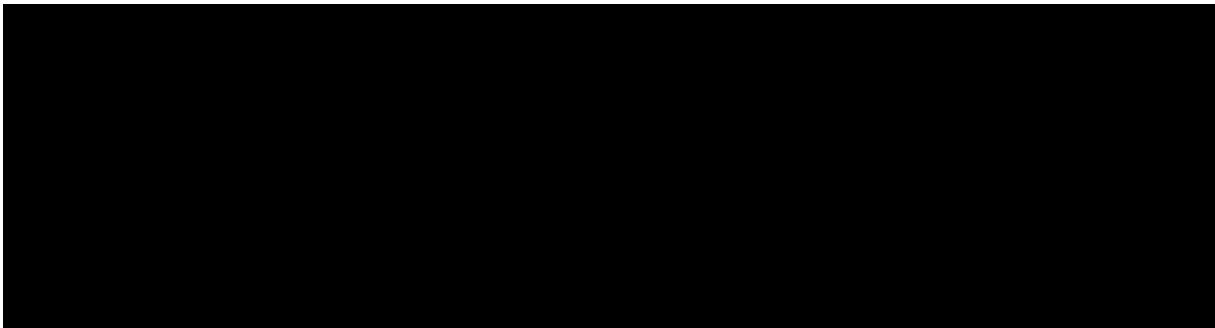
February 17, 2022, 2:28 PM EST   
[0 viewers](#) [0 subscribers](#)

- [Respond](#)
- [Reassign Alert](#)
- [Close Alert](#)
- [Add Note](#)
- [Subscribe](#)

**Profile**

**Transaction Information**

**Client Information**



**Activity**

- Alert Assigned**  
02/17/2022, 2:41:15 PM EST · System Generated  
Automatically assigned to [CLF] ECR Team
- Alert status set to New**  
02/17/2022, 2:41:15 PM EST · System Generated
- Alert Created: High-Risk: ECR**  
02/17/2022, 2:41:11 PM EST · System Generated  
High-Risk: ECR

**Score Report**

**Net Promoter Scores**



**Associate Drivers**



**Branch Drivers**



**Others**

Needs Not Addressed  Yes  No

Flex Question  Yes, I would like to continue with the survey  No, I would like to submit the survey

Interacted With  Teller  Teller at Drive Up  Employee other than teller (Branch Manager, Personal Banker, Financial Wellness Consultant)

Reason for call  Yes  No

**Verbatims**



Reason for Likelihood to Recommend Comment

Received adequate service, but renovations were rather frustrating and blocked an earlier visit.

How could KeyBank be better for you?

I thought the branch was fine before the renovations, and was quite frustrated when I:

- 1) attempted to visit in-person earlier and found the lobby was closed for renovations, with no notice to me beforehand (if you send a letter asking for action on an account, with a time limit before it escheats, bloody well be open to receive that action);
- 2) called to make an appointment for in-branch services as directed by the sign closing the lobby, only to get no response whatever.

Bonus: Reopen a few branches within the City of Pittsburgh. Needed an ATM, if not a teller, and had to spend a few hours queuing about in the East End because KeyBank closed its branches in the East Liberty area; finally had to fall back to Oakland. Felt like racism to me.

Describe Question

Time to close an Officially Old Account. Best done in person, as far as I'm concerned, and without knowing what sort of paperwork you'd want, simplest to just haul the physical checkbook, statements, and the warning letter in along with my ID. Too much for the drive-through.

**Segments**

**Segments**

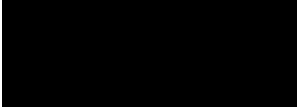
Transaction Product  
CHECKING/MONEY MARKET

Transaction Description  
Deposit

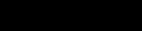


**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

March 4, 2022



Re: Key Case No. 10216543

Dear 

Thank you for contacting us regarding your recent concern related to the East Liberty branch closure or consolidation.

KeyBank is committed to a strong branch network in the communities we serve tailored to client convenience and preference. We know that while mobile and online options offer tremendous speed and convenience, many clients still want to sit down, face-to-face with our branch professionals to discuss more complex banking needs.

Like any other business, KeyBank continually reviews the structure of its organization to maintain a strong position in the marketplace and remain profitable while continuing to serve the financial needs of our clients. The decision to close or consolidate a branch may be based on decreased client foot traffic due to increased online/mobile banking usage and/or proximity to another KeyBank branch.

KeyBank is committed to making this transition as smooth as possible for our clients. Clients can expect to continue to receive the same high level of service from KeyBank at other nearby branches and will continue to have access to KeyBank's ATM network, telephone banking at 1-800-KEY2YOU, online banking via the internet at key.com, and mobile banking. For clients using a TDD/TTY device, please call 1-800-539-8336. Our clients have many options to connect with KeyBank when, where, and how they prefer.

At KeyBank, we're committed to diversity, equity, and inclusion in all we do. Please be advised that we take discrimination claims seriously, and I want to assure you that KeyBank complies with all Federal and State anti-discrimination laws in addition to our own internal policies regarding discrimination. KeyBank does not discriminate against individuals based on age, race, color, religion, national origin, sex, sexual orientation, veteran status, disability, marital status, familial status (e.g. family size or childbearing intentions), receipt of public assistance income or any exercise of rights under the Consumer Credit Protection Act.

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TDD/TTY device, please call 1-800-539-8336. We are available Monday through Friday from 8am to 7pm Eastern time.

Sincerely,



Enterprise Client Relations  
Office of the President

[REDACTED]

---

**From:** Executive Client Relations  
**Sent:** Monday, February 7, 2022 9:14 AM  
**To:** KBM Client Complaints; Executive Client Relations; [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** NEW CASE - [REDACTED] ECR - Please review - FW: customer complaint and accusation of discrimination - [REDACTED]  
**Attachments:** [REDACTED] - Initial Disclosure Package signed 10.11.2021.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello,

ECR will take this in as a new case.

[REDACTED]

New case for you.  
Also moved to your ECR folder.

Please let me know if you have any questions.

Thanks!

[REDACTED]

**KeyBank** 

---

**From:** [REDACTED]  
**Sent:** Friday, February 04, 2022 5:56 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** ECR - Please review - FW: customer complaint and accusation of discrimination - [REDACTED]

Hello ECR,

Client [REDACTED] has accused the bank of discrimination regarding his mortgage loan application [REDACTED]

Per the loan officer's email below:

[REDACTED] - applied for cash out refinance of 520k at 15 year term. We could not use rental income because although [REDACTED] stated verbally and in LOX letters (that are in the file) that [REDACTED] claimed income on his former residence turned investment property [REDACTED] could not provide any schedules showing income claimed for 2019 and 2020. This created an issue of not qualifying per DTI. We counter offered at 30 year term and initially this was accepted however [REDACTED] almost immediately [REDACTED] began to complain to [REDACTED] that [REDACTED] wanted the 15 year term and rate. [REDACTED] and I

both spoke with [REDACTED] and [REDACTED] said [REDACTED] wanted the 15 year term & rate for whatever amount [REDACTED] could qualify for so I sent it back to underwriting and [REDACTED] reduced loan amount to \$300k leaving about \$270k cash to close to pay all liens. My last phone conversation with [REDACTED] was that [REDACTED] could do this and would provide bank statement for the cash to close funds. [REDACTED] and I both have been reaching out to [REDACTED] through email and calls with no response until today when [REDACTED] talked to [REDACTED] and stated that [REDACTED] would not do the loan with us. [REDACTED] feels that Myself and the underwriter discriminated against [REDACTED] and told [REDACTED] [REDACTED] found another bank that would do the loan as [REDACTED] wanted ( we have no proof of this that I am aware of) [REDACTED] also told [REDACTED] that [REDACTED] would be pulling all of his accounts as well as making sure the church accounts [REDACTED] manages are pulled and that [REDACTED] would be sure to tell his church and community not to do business with Key Bank saying we discriminate against African Americans. This is a conventional refinance and Freddie/fannie guidelines. Original application was submitted with additional rental income – 25% vacancy as standard calculation based on client stating [REDACTED] claims rental income on [REDACTED] taxes. Income was removed by UW after several attempts given for [REDACTED] to show where [REDACTED] claimed the income went without proof.

Please confirm that ECR will take this case due to the high-risk language made by the client.

Thank you

[REDACTED]  
[REDACTED]  
[REDACTED]  


---

**From:** [REDACTED]  
**Sent:** Thursday, February 03, 2022 5:26 PM  
**To:** [REDACTED]  
**Subject:** FW: customer complaint and accusation of discrimination

Team just wanted this on record so no one is blindsided if this customer complains. If you need anything else please let us know.

[REDACTED]  
[REDACTED]  
[REDACTED]  


---

**From:** [REDACTED]  
**Sent:** Thursday, February 3, 2022 3:07 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** customer complaint and accusation of discrimination

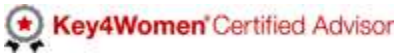
[REDACTED] - applied for cash out refinance of 520k at 15 year term. We could not use rental income because although [REDACTED] stated verbally and in LOX letters (that are in the file) that [REDACTED] claimed income on his former residence turned investment property [REDACTED] could not provide any schedules showing income claimed for 2019 and 2020. This created an issue of not qualifying per DTI. We counter offered at 30 year term and initially this was accepted

however [REDACTED] almost immediately [REDACTED] began to complain to [REDACTED] that [REDACTED] wanted the 15 year term and rate. [REDACTED] and I both spoke with [REDACTED] and [REDACTED] said [REDACTED] wanted the 15 year term & rate for whatever amount [REDACTED] could qualify for so I sent it back to underwriting and [REDACTED] reduced loan amount to \$300k leaving about \$270k cash to close to pay all liens. My last phone conversation with [REDACTED] was that [REDACTED] could do this and would provide bank statement for the cash to close funds. [REDACTED] and I both have been reaching out to [REDACTED] through email and calls with no response until today when [REDACTED] talked to [REDACTED] and stated that [REDACTED] would not do the loan with us. [REDACTED] feels that Myself and the underwriter discriminated against [REDACTED] and told [REDACTED] [REDACTED] found another bank that would do the loan as [REDACTED] wanted ( we have no proof of this that I am aware of) [REDACTED] also told [REDACTED] that [REDACTED] would be pulling all of his accounts as well as making sure the church accounts [REDACTED] manages are pulled and that [REDACTED] would be sure to tell his church and community not to do business with Key Bank saying we discriminate against African Americans. This is a conventional refinance and Freddie/fannie guidelines. Original application was submitted with additional rental income – 25% vacancy as standard calculation based on client stating [REDACTED] claims rental income on his taxes. Income was removed by UW after several attempts given for [REDACTED] to show where claimed the income went without proof.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



[Key.com](#) | [LinkedIn](#) | [Facebook](#) | [Instagram](#)



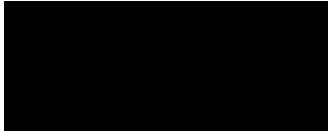
KeyCorp Internal





**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

March 17, 2022



Re: Case No. 10204333

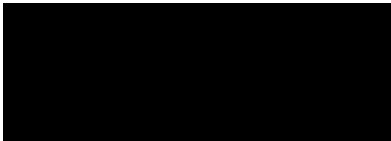


Thank you for contacting us regarding your recent concern. KeyBank is committed to providing ease, value, and expertise to our clients and addressing any concerns timely.

However, we have not been able to reach you by phone to share the resolution with you. If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TDD/TTY device, please call 1-800-539-8336. We are available Monday through Friday from 8am to 7pm Eastern time.

Thank you for allowing us to serve your banking needs and contribute to your financial wellness.

Sincerely,



Enterprise Client Relations  
Office of the President

High-Risk: ECR - goes to next state in 31 hours - Assigned to [CLF] ECR Team NEW

2/10

April 5, 2022, 3:03 PM EST

[0 viewers](#) [0 subscribers](#)

Respond Reassign Alert Close Alert Add Note Subscribe

### Profile

#### Customer Information

Client ID	
Email	
Age (Branch/ATM)	
ATM / Branch ID	
Branch/ATM Transaction Type	
Client Type	
Customer Type Export	
Gender	
Line of Business	
Tenure	
Transaction Date (ET)	
Transaction Description	
Transaction ID	
Transaction Product	

#### Metadata Information

Response Date (ET)	04/05/2022, 03:03 PM
Survey ID	
IPI	
Transaction ID	
Unit	

### Activity

- Alert Assigned**  
04/05/2022, 3:07:23 PM EST - System Generated  
Automatically assigned to [CLF] ECR Team
- Alert status set to New**  
04/05/2022, 3:07:23 PM EST - System Generated
- Alert Created: High-Risk: ECR**  
04/05/2022, 3:07:20 PM EST - System Generated  
High-Risk: ECR

### Score Report

#### Net Promoter Scores

ATM NPS  2

#### ATM Drivers

ATM Satisfaction  2

ATM Cleanliness  8

ATM Convenience  0

ATM Ease of Navigation  1

ATM Range of Services  5

ATM Security  8

#### Others

Needs Not Addressed

**Verbatims**



Reason for Likelihood to Recommend Comment

I've been a KeyBank customer since Key took over Society Bank here in Springfield, Ohio, many years ago. (I actually took out my checking account in 1970 before "Springfield Bank" became Society.). I am still upset that Key closed the branch office in the Burnett Plaza shopping center on the east side of town. I'm sure the folks in Cleveland looked at the numbers and decided this move was in their best interest. However, since then, there have been many homes built on the east side of town with many more planned. Because of this expanded potential customer base, your executives may want to take another look.

The nearest KeyBank and Key ATM to where we live is downtown. I pulled up a map of Springfield with all the banks identified. To get to the KeyBank ATM I drive by: Woodforest National Bank, PNC Bank, Fifth/Third Bank, and Merchants National Bank.

Remember what I said. Many new homes are being built on the east and south east sides of Springfield. Those families will be looking for the nearest grocery, nearest drug store, nearest this and that AND the nearest bank.

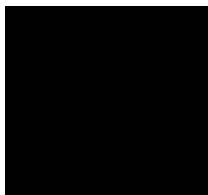
Wouldn't it be in the best interest of KeyBank to at least place an ATM on the east side of town (like the one on Derr Road; north of the city)?

How could KeyBank be better for you?

See my response to the first question.

**Segments**

**Segments**





**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

April 22, 2022

Re: Key Case No. 10347313

Dea [REDACTED]

Thank you for contacting us regarding your recent concern related to Burnet Plaza branch closure or consolidation.

KeyBank is committed to a strong branch network in the communities we serve tailored to client convenience and preference. We know that while mobile and online options offer tremendous speed and convenience, many clients still want to sit down, face-to-face with our branch professionals to discuss more complex banking needs.

Like any other business, KeyBank continually reviews the structure of its organization to maintain a strong position in the marketplace and remain profitable while continuing to serve the financial needs of our clients. The decision to close or consolidate a branch may be based on decreased client foot traffic due to increased online/mobile banking usage and/or proximity to another KeyBank branch.

KeyBank is committed to making this transition as smooth as possible for our clients. Clients can expect to continue to receive the same high level of service from KeyBank at other nearby branches and will continue to have access to KeyBank's ATM network, telephone banking at 1-800-KEY2YOU, online banking via the internet at key.com, and mobile banking. For clients using a TDD/TTY device, please call 1-800-539-8336. Our clients have many options to connect with KeyBank when, where, and how they prefer.

Lastly, please be assured that KeyBank takes its Community Reinvestment Act (CRA) responsibilities seriously. KeyBank is proud of its Outstanding ratings, which reflect our ongoing commitment to serving our communities and neighbors. For more information on how KeyBank invests in its communities and helps clients and communities thrive, please visit: <https://www.key.com/about/corporate-responsibility/corporate-responsibility-reporting.jsp>

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TDD/TTY device, please call 1-800-539-8336. We are available Monday through Friday from 8am to 7pm Eastern time.

Sincerely,

[REDACTED]  
Enterprise Client Relations  
Office of the President



6/10

June 11, 2022, 1:05 PM EST   
[Viewers](#) [Subscribers](#)

[Respond](#) [Reassign Alert](#) [Close](#) [Add](#) [Subscribe](#)

**P r o f**

**Customer Information**

App ID (Mobile) [Redacted]  
City [Redacted]  
Digital Survey [Redacted]  
Origin Type [Redacted]  
Region [Redacted]

**Metadata Information**

Response Date (ET) 06/11/2022, 01:05 PM  
Survey ID [Redacted]  
IP [Redacted]  
Unit [Redacted]

**A c t i v**

- Note**  
06/11/2022, 1:22:39 PM EST - [Redacted] [CLF] Customer Advocacy Team  
transfer due to concerns about branch closures
- Alert**  
06/11/2022, 1:22:29 PM EST - [Redacted] [CLF] Customer Advocacy Team  
Assigned to [CLF] ECR Team by [Redacted]
- Alert**  
06/11/2022, 1:05:52 PM EST - System Generated  
Automatically assigned to [CLF] Customer Advocacy Team

[View](#)

**S c o r e  
R e p o r t**

Digital Satisfaction 3

**C u s t o m**

[Redacted]

**V e r b a t**

Reason for Score Comment  
I wish there were locations closer to my house so I could just deposit the check at the bank and get the cash out... You have close to four branches you took away a mobile center and never replaced it access to your banks is getting harder and we will probably move banks



**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

June 28, 2022



Re: Key Case No. 10422662

Dear 

Thank you for contacting us regarding your recent concern related to the branch closure or consolidation in your area.

KeyBank is committed to a strong branch network in the communities we serve tailored to client convenience and preference. We know that while mobile and online options offer tremendous speed and convenience, many clients still want to sit down, face-to-face with our branch professionals to discuss more complex banking needs.

For your convenience I am including branch's closest to you that may be of assistance. These branches include Franklin at 1750 Northwood Plaza Dr., Franklin, IN 46131 and the Southport Branch at 7447 S US Hwy 31, Indianapolis, IN 46227.

Like any other business, KeyBank continually reviews the structure of its organization to maintain a strong position in the marketplace and remain profitable while continuing to serve the financial needs of our clients. The decision to close or consolidate a branch may be based on decreased client foot traffic due to increased online/mobile banking usage and/or proximity to another KeyBank branch.

KeyBank is committed to making this transition as smooth as possible for our clients. Clients can expect to continue to receive the same high level of service from KeyBank at other nearby branches and will continue to have access to KeyBank's ATM network, telephone banking at 1-800-KEY2YOU, online banking via the internet at key.com, and mobile banking. For clients using a TDD/TTY device, please call 1-800-539-8336. Our clients have many options to connect with KeyBank when, where, and how they prefer.

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. We are available Monday through Friday from 8am to 7pm Eastern time.

Sincerely,



Enterprise Client Relations  
Office of the President





March 26, 2022, 10:00 AM EST

[0 viewers](#) [0 subscribers](#)

- Respond ▼
- Reassign Alert
- Close Alert
- Add Note
- Subscribe

### Profile

#### Transaction Information

Survey Program	[REDACTED]
Survey ID	[REDACTED]
Transaction ID	[REDACTED]
Response Date (ET)	03/26/2022, 10:00 AM
Transaction Date (ET)	[REDACTED]
Branch/ATM Transaction Type	[REDACTED]
Associate Name	[REDACTED]
Employee Type	[REDACTED]
Branch / ATM Name	[REDACTED]

#### Client Information

Client Name	[REDACTED]
Client ID	[REDACTED]
Client IPI	[REDACTED]
IPI	[REDACTED]
Email	[REDACTED]
Client Type	[REDACTED]
Tenure	[REDACTED]
Gender	[REDACTED]
Age (Branch/ATM)	[REDACTED]

### Activity

- 🔔 **Alert Assigned**  
03/26/2022, 10:15:16 AM EST - System Generated  
Automatically assigned to [CLF] ECR Team
- 🔔 **Alert status set to New**  
03/26/2022, 10:15:16 AM EST - System Generated
- 🔔 **Alert Created: High-Risk: ECR**  
03/26/2022, 10:15:14 AM EST - System Generated  
High-Risk: ECR

### Score Report

#### Net Promoter Scores

Branch NPS 8

#### Associate Drivers

Satisfaction with Associate 7

Warm Welcome 10

Easy to do Business 7

Genuine Thank You 10

Addressed by Name  Yes  No

#### Others

Needs Not Addressed  Yes  No

Flex Question  Yes, I would like to continue with the survey  No, I would like to submit the survey

Problem impact  Minor  Moderate  Severe

Problem resolved  Yes  No

Interacted With  Teller  Teller at Drive Up  Employee other than teller (Branch Manager, Personal Banker, Financial Wellness Consultant)

Reason for call  Yes  No

Preferred Contact Method  Yes - Please contact me via phone  Yes - Please contact me via email  No

**Verbatims**



Reason for Likelihood to Recommend Comment

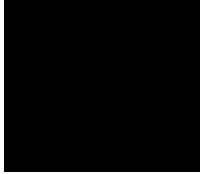
Because so many other branches have been closed in Dayton. In case you are wondering, this is what you call institutional racism.

Problem reason

This branch is too far from my home.

**Segments**

**Segments**







**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

June 10, 2022

[REDACTED]

Re: Key Case No. 10337782

Dear [REDACTED]

Thank you for contacting us regarding your recent concern related to the recent branch consolidations in the Dayton area.

KeyBank is committed to a strong branch network in the communities we serve tailored to client convenience and preference. We know that while mobile and online options offer tremendous speed and convenience, many clients still want to sit down, face-to-face with our branch professionals to discuss more complex banking needs.

Like any other business, KeyBank continually reviews the structure of its organization to maintain a strong position in the marketplace and remain profitable while continuing to serve the financial needs of our clients. The decision to close or consolidate a branch may be based on decreased client foot traffic due to increased online/mobile banking usage and/or proximity to another KeyBank branch.

KeyBank is committed to making this transition as smooth as possible for our clients. Clients can expect to continue to receive the same high level of service from KeyBank at other nearby branches and will continue to have access to KeyBank's ATM network, telephone banking at 1-800-KEY2YOU, online banking via the internet at key.com, and mobile banking. For clients using a TDD/TTY device, please call 1-800-539-8336. Our clients have many options to connect with KeyBank when, where, and how they prefer.

Please feel free to visit the following branches:

Northridge  
4600 N Dixie Dr  
Dayton, OH 45414

Eastown  
4000 Linden Ave  
Dayton, OH 45432

Germantown –  
Gettysburg  
3736 Germantown Pike  
Dayton, OH 45417

North Main  
4747 N Main St  
Dayton, OH 45405

At KeyBank, we're committed to diversity, equity, and inclusion in all we do. Please be advised that we take discrimination claims seriously, and I want to assure you that KeyBank complies with all Federal and State anti-discrimination laws in addition to our own internal policies regarding discrimination. KeyBank does not discriminate against individuals based on age, race, color, religion, national origin, sex, sexual orientation, veteran status, disability, marital status, familial status (e.g. family size or childbearing intentions), receipt of public assistance income or any exercise of rights under the Consumer Credit Protection Act.

Lastly, please be assured that KeyBank takes its Community Reinvestment Act (CRA) responsibilities seriously. KeyBank is proud of its Outstanding ratings, which reflect our ongoing commitment to serving our

communities and neighbors. For more information on how KeyBank invests in its communities and helps clients and communities thrive, please visit: <https://www.key.com/about/corporate-responsibility/corporate-responsibility-reporting.jsp>.

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TDD/TTY device, please call 1-800-539-8336. We are available Monday through Friday from 8am to 7pm Eastern time.

Sincerely,



Enterprise Client Relations  
Office of the President

**From:** [REDACTED]  
**Sent:** Tuesday, June 7, 2022 3:05 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Redlining and Racism in Buffalo's Lending Practices

**WARNING:** This email originated externally. Exercise caution. Think before clicking links or opening attachments.

Sent to Channel Four's "Call for Action" team on Tuesday, 6/7/2022

## **Redlining and Racism in Buffalo's Lending Practices**

I recently applied for a Home Equity Line of Credit (HELOC) with Keybank at their Amherst branch. Their stated "loan to value" ratio is 80%.

My credit score is 800 +, I am employed, my home is debt free and completely paid off, with no liens. After qualifying, they approved my loan, however only at 60% of the value of the appraisal company they hired.

I asked the relationship manager that I applied through to get me an explanation as to why I was approved at a 20 % lower loan, and as of yet have received none.

It is documented as recently as 2021 in the then New York governor's state investigation into redlining in Buffalo that this practice is still widespread and ongoing, even though it has been officially outlawed. That investigation by the Department of Financial Services showed there has been a significant lack of lending in majority-minority neighborhoods, and to homebuyers of color, even after redlining was banned decades ago.

The zip code I live in is 14215, though my home is located in Cheektowaga. Also, I am African American. These are the only two things that I can reasonably conclude they based their lending decision on. I would like the "Call for Action" team to investigate and REPORT on my case.

I look forward to hearing from you,

[REDACTED]

Tuesday, 6/7/2022



**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

August 8, 2022

[REDACTED]  
[REDACTED]  
[REDACTED]

RE: [REDACTED]  
Key Case No. 10417411

Dear [REDACTED]:

This letter is in response to your recent experience related to your Account. We regret the frustrating experience you've had and would like to give you a better understanding of our underwriting process. When underwriting loans, we use standard underwriting criteria and our underwriting decisioning is based completely on the financial information provided by our clients and we take this disclosure process very seriously.

When we are reviewing applications for credit products, the property value and loan to value ratio are just one of the many credit factors taken into consideration. In addition, we are required to ensure that our clients have the ability to repay that loan. We initially approved your loan on May 31, 2022, and at that time we used the following for your income: Social Security award letter, W-2, and paystubs. That income information was sufficient at the time for the amount of the loan that was being requested. When the appraisal on the home came in higher than anticipated, we utilized the extra income you provided to assist with the increased requested amount for the loan. The extra income that was used was pension and annuity income from your 1099s.

When we looked at all your income together in conjunction with our underwriting standards, we approved your loan for the highest amount that we could based on your debt-to-income ratio. For the Key Equity Option loan that you were applying for, we must look at what the maximum payment would be if you maxed out the account for debt-to-income purposes. While you had very little debt, maxing out the account would take a lot of your income and therefore, we were able to approve your loan for 72.3% of the value of the home.

At KeyBank, we're committed to diversity, equity, and inclusion in all we do. Please be advised that we take discrimination claims seriously, and I want to assure you that KeyBank complies with all Federal and State anti-discrimination laws in addition to our own internal policies regarding discrimination. KeyBank does not discriminate against individuals based on age, race, color, religion, national origin, sex, sexual orientation, veteran status, disability, marital status, familial status (e.g. family size or childbearing intentions), receipt of public assistance income or any exercise of rights under the Consumer Credit Protection Act.

Thank you for allowing us to serve your banking needs and contribute to your financial wellness. If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TDD/TTY device, please call 1-800-539-8336. We are available Monday through Friday from 8am to 7pm Eastern time.

Sincerely,



Enterprise Client Relations  
Office of the President

**Subject Line:**

ECR Complaint: [REDACTED]

**Referral:**

[REDACTED]

Good day,

I wanted to make you aware of a complaint we received in the Executive Offices.

Branch: New England, New York, Ohio and Michigan

- [REDACTED]

The following is a synopsis of the client's complaint and any supporting research we were able to find.

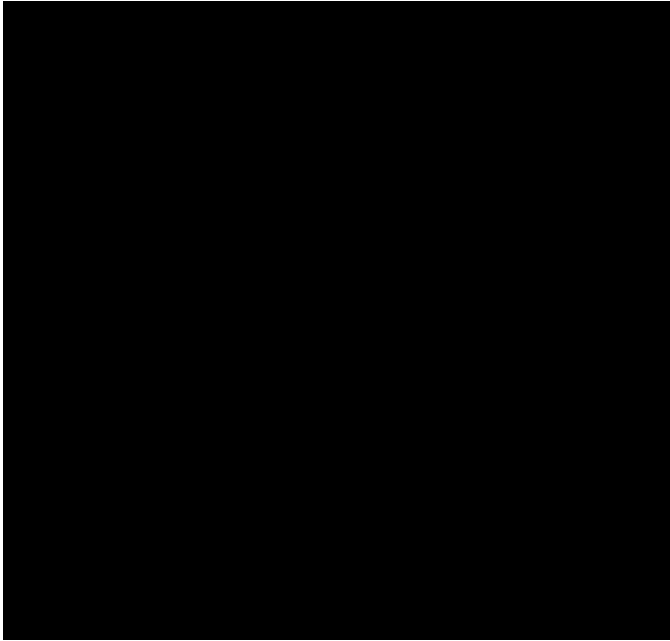
**GRC Case#: 10422878**

[REDACTED]

**Complaint (in the client's words):**

- I don't have a problem at all with the Ransomville bank, my angst goes to KeyBank closing so many branches when they took over First Niagara years ago.
- I work in Newfane, NY, and I live in Youngstown, NY. I sent a letter to the CEO in Cleveland about this, because at that time, the only way to access my funds was via ATMs at the Rite Aides. I was told that I was going to have to pay a fee at the ATMs. So far, I haven't had to.
- However, I am hoping that another bank comes into Newfane and Youngstown. If that happens, I'll be moving all of my accounts to that bank, leaving KeyBank. I hate saying this wildly broad statement, but in my view the KeyBank "corporation" doesn't care so much about rural communities. I was told by one person to "just" go to Lewiston, NY where the closest KeyBank is located to me. It's quite the inconvenience.
- Therefore, the grade of 5 stands.
- And, yes, I tell my friends and family about the above issues.
- Open up more branches in the rural areas of NYS.

[REDACTED]



In order to appropriately review and respond to the client's concerns, I ask that you please respond to the above within 48 business hours.

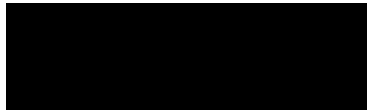
If you have any additional questions or concerns, please feel free to contact me.

Thank you,



**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

July 25, 2022



Key Case No. 10422878

Dear 

Thank you for contacting us regarding your recent concern related to the branch closures in Newfane, NY and Youngstown, NY.

KeyBank is committed to a strong branch network in the communities we serve tailored to client convenience and preference. We know that while mobile and online options offer tremendous speed and convenience, many clients still want to sit down, face-to-face with our branch professionals to discuss more complex banking needs.

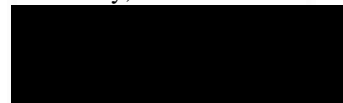
Like any other business, KeyBank continually reviews the structure of its organization to maintain a strong position in the marketplace and remain profitable while continuing to serve the financial needs of our clients. The decision to close or consolidate a branch may be based on decreased client foot traffic due to increased online/mobile banking usage and/or proximity to another KeyBank branch.

Clients can expect to continue to receive the same high level of service from KeyBank at other nearby branches and will continue to have access to KeyBank's ATM network, telephone banking at 1-800-KEY2YOU, online banking via the internet at key.com, and mobile banking. Our clients have many options to connect with KeyBank when, where, and how they prefer.

Lastly, please be assured that KeyBank takes its Community Reinvestment Act (CRA) responsibilities seriously. KeyBank is proud of its Outstanding ratings, which reflect our ongoing commitment to serving our communities and neighbors. For more information on how KeyBank invests in its communities and helps clients and communities thrive, please visit: <https://www.key.com/about/corporate-responsibility/corporate-responsibility-reporting.jsp>

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TDD/TTY device, please call 1-800-539-8336. We are available Monday through Friday from 8am to 7pm Eastern time.

Sincerely,



Enterprise Client Relations  
Office of the President



# CUSTOMER COMPLAINT FORM

Transaction ID: XXXXXXXXXX

Please fill in this form completely. Once we receive your form, you will receive a confirmation e-mail. You will receive a separate e-mail containing your assigned case number within 48 hours. Please keep your case number for future contact with our office. **You will have the option to PRINT the form after submission.**

## Have you tried to resolve your complaint with your financial institution?

**YES**

The OCC recommends that you attempt to resolve your complaint with your financial institution first. Please contact your financial institution to allow them the opportunity to resolve your issue(s).

## Helpful Hints:

- **Check to make sure that your financial institution is a national bank or federal savings association (thrift). [Search Financial Institutions](#) (a new browser window will open)**  
If you don't know the name of your financial institution, check your bank or credit card statement. The institution's name will be indicated on the statement.
- **If your complaint involves more than one financial institution, you will need to submit a separate complaint form for each institution involved. You will receive separate case numbers for each institution. Do NOT send additional information unless requested.**
- **Complaints should NOT be emailed, faxed, or mailed in addition to the online submission. Only ONE form should be submitted unless your complaint involves more than one financial institution. The online form is subject to user time limitations for security purposes. If your session exceeds the limitations, any information you have entered will be lost. To avoid this, gather all necessary information prior to entering the form.**

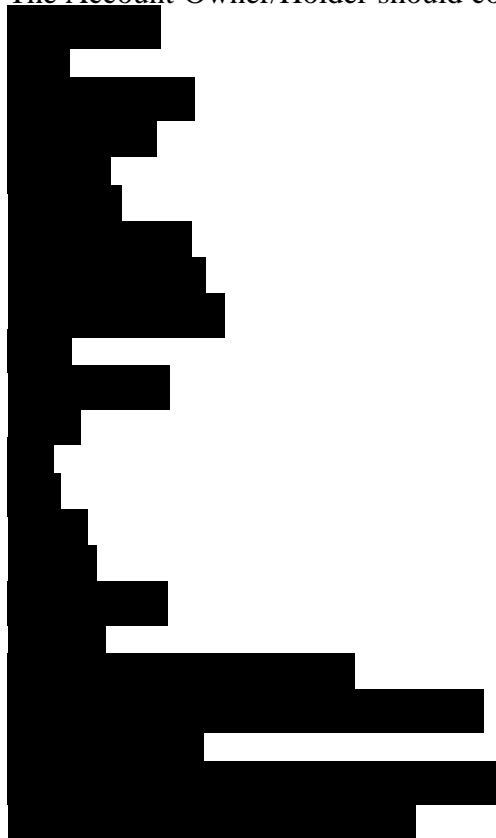
## Please Note:

- **We cannot act as a court of law or as a lawyer on your behalf**
- **We cannot give you legal advice**
- **We cannot become involved in complaints that are in litigation or have been litigated**

## YOUR INFORMATION

---

The Account Owner/Holder should complete this section.



## REPRESENTATIVE CONTACT INFORMATION

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If you want us to communicate with your attorney or other legal representative directly, please provide the information below. **Your submission of this portion of the form authorizes our office to release information to your attorney or other legal representative if requested.**

Relationship:

Attorney  Representative  Not Applicable (Skip Section)

Please indicate the type of authorization you have granted to your Attorney or Representative :

Power of Attorney  Letters Testamentary  Court Appointed Executor or  
Administrator  Other

Name of Representative:

First Name:

Middle Name:

Last Name:

Country:

Street Address:

City:

State:

Zip:

Phone:

E-mail:

What is the best way to contact your representative?

When is the best time to contact your representative?

## FINANCIAL INSTITUTION OR COMPANY INFORMATION THAT IS SUBJECT OF THE COMPLAINT

---

Helpful Hint: If you don't know the name of your financial institution, check your bank or credit card statement. The institution's name will be indicated on the statement.

Name of Financial Institution or Company:

**Keybank National Association**

Street:

City:

**Tonawanda**

State:

**NY**

Phone:

Zip:

**14150**

Type of Account(s): (If you are unsure of the type of account(s), please contact your financial institution for assistance.)

Deposit Account (Checking, Savings)  Credit Card

Loan Product (Consumer, Mortgage, Home Equity)  Asset Management (Trust Accounts)

Consumer Leasing  Non-Deposit Account (Investments)

Insurance  Other

Have you tried to resolve your complaint with your financial institution

**YES**

If Yes, when?

How?

**Phone, In Person**

Has the financial institution responded to your complaint?

**NO**

If Yes, when?

How?

Contact Name:

Title:

## COMPLAINT INFORMATION

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Describe events in the order they occurred, including any names, phone numbers, and a full description of the problem with the amount(s) and date(s) of any transaction(s). Be as brief and complete as possible to make the explanation clear. **Do not include personal or confidential information such as your social security, credit card, or bank accounts numbers.**

**Keybank uses overdraft fees to target certain classes of individuals because of their personal financial situation. Further Keybank's consumer website presents the order in which withdrawals are presented for payment contrary to how overdraft fees are assessed. I've requested that they reverse specific overdraft fees, as they were the result of the impact of COVID19, due to the fact that I wasn't working for a period of time, however I was advised that they were unable to acc**

**ommodate my request. Lastly, it would seem that Keybank's overdraft policy is discriminatory in nature and unfairly targets individuals who make less money.**

Please be advised that the issues described in this complaint will be shared with the financial institution or company in question.

## PRIVACY ACT STATEMENT

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The information you provide to the Office of the Comptroller of the Currency (OCC) will permit us to respond to your complaint or inquiry about the national banks or federal savings associations (thrifts) we supervise.

The collection of this information is authorized by [12 USC 1](#).

Your submission of information to the OCC is entirely voluntary. You are not required to submit any information or to submit a complaint. However, if you do not submit the requested information, the OCC may not be able to process your request or inquiry.

Information about your complaint or inquiry will be used within the OCC and provided to the national bank or federal savings association (thrift) that is the subject of the complaint or inquiry. Additionally, this information may be shared with the following, pursuant to published routine uses:

- (1) other third parties when required or authorized by statute or when necessary in order to obtain additional information relating to the complaint or inquiry;
- (2) other governmental, self-regulatory, or professional organizations
  - (a) having jurisdiction over the subject matter of the complaint or inquiry;
  - (b) having jurisdiction over the entity that is the subject of the complaint or inquiry; or
  - (c) whenever such information is relevant to a known or suspected violation of law or licensing standard for which another organization has jurisdiction;
- (3) the Department of Justice, a court, an adjudicative body, a party in litigation, or a witness when relevant and necessary to a legal or administrative proceeding;
- (4) a Congressional office when the information is relevant to an inquiry initiated on behalf of its provider;
- (5) other governmental or tribal organizations with which an individual has communicated regarding a complaint or inquiry about an OCC-regulated entity;
- (6) OCC contractors or agents when access to such information is necessary; and
- (7) other third parties when required or authorized by statute.

You may find additional information regarding the rights and obligations related to the OCC's collection of the requested information at [81 FR 2945-01, 2957](#) (PDF).

Date:6/27/2022 11:22:59 PM

I certify that the information provided on this form is true and correct to the best of my knowledge.

**I Certify  I Do Not Certify**

If a valid OMB Control Number does not appear on this form, you are not required to complete this form.

-



**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

July 14, 2022

[REDACTED]

RE: [REDACTED]  
OCC Case No. 03355050  
Key Case No. 10453685

Dear [REDACTED]

This letter is in response to your issue filed with the Office of the Comptroller of the Currency (the “OCC”) regarding overdraft charges assessed to your Account, denied requests for a refund, and allegation of discriminatory overdraft practices. We regret the frustrating experience you’ve had and would like to share the results of our investigation.

All fees were found to be assessed in accordance with KeyBank’s Deposit Account Agreement and Funds Availability Policy. This document was provided at Account opening and is provided to all clients and is not specific to you. For your reference, I’ve enclosed a copy of our most recent version. The document also discusses transaction posting order, which again, applies to all clients.

Review of our records indicates you opted out of overdraft services consent for ATM and everyday Debit Card transactions on August 3, 2021. By choosing "NO" for overdraft consent, any ATM transactions and everyday debit card transactions that would cause your account to be overdrawn will typically be declined. However, overdrafts may still be paid at the discretion of KeyBank on checks, automatic bill payments and recurring debit card transactions.

I would like the opportunity to explain in more detail why these fees were assessed to your Account. Please be aware that as per Regulation E (“Reg. E”), clients must consent to “opt in” if they want their bank to allow them to overdraw their Account for ATM and everyday debit card transactions. Only ATM and everyday debit card transactions are affected by Reg. E. Everyday debit card transactions are typical transactions most people make with their debit card in daily shopping. Recurring debit card transactions, such as automatic withdrawals authorized on accounts using a debit card, are not affected by Reg. E.

Below are some additional actions you may consider taking to prevent recurrence depending upon your specific situation:

- Verify you have sufficient available funds in your Account to cover outstanding debits, i.e., written checks, automatic recurring debits, online bill payments, etc. before making debit card purchases, writing checks, or initiating other debits.

- Review the enclosed Overdraft Q & A.
- Schedule a Financial Wellness review at the branch of your choosing so that we may better understand your situation and determine if other account types or products may be more suitable for you. You may schedule this review by using [www.key.com](http://www.key.com), calling 1-800-539-2968, or by calling your local River Road KeyCenter at 716-692-1417.
- Review the content of this link:
  - <https://www.key.com/personal/services/checking-savings/overdraft-protection-options.html>

Additionally, no bank errors were found in the posting of your transactions to the Account. At KeyBank, we post transactions in two different groups – prior-day and current-day. Prior-day transactions are posted first with deposits posted before payments and withdrawals. This generally includes any account activity that occurred after the cutoff period of the previous day and before midnight. After prior-day transactions, current-day transactions are posted with deposits first before payments and withdrawals. If a deposit is made before the cutoff time on a business day (which excludes Saturdays, Sundays, and legal holidays) we will consider that day to be the day of your deposit. Cutoff times vary depending on how you make your deposit.

- At a KeyBank Branch: before branch closing
- At a KeyBank ATM: 7 p.m. local time
- Mobile: 11 p.m. ET

However, on July 11, 2022, as a gesture of good will, your local River Road KeyCenter refunded [REDACTED] of the overdraft and returned item fees (over fifty [50] percent) that you'd been assessed over the course of twelve (12) months that hadn't been refunded. This will reflect on your next Account statement. Once again, we highly recommend getting in touch with your local River Road KeyCenter for a KeyBank Financial Wellness Review.

Thank you for allowing us to serve your banking needs and contribute to your financial wellness. If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TDD/TTY device, please call 1-800-539-8336. We are available Monday through Friday from 8am to 7pm Eastern time.

Sincerely,

[REDACTED]

[REDACTED]

Enterprise Client Relations  
Office of the President

#### Attachments

KeyBank Deposit Account Agreement and Funds Availability Policy  
Overdraft Q & A

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, September 29, 2022 12:02 PM  
**To:** [REDACTED]  
**Subject:** RE: CRA Officer-Key Bank  
**Attachments:** Southern Dallas Progress 09 29 2022.pdf

Good afternoon [REDACTED]

Thank you for your correspondence. We appreciate the opportunity to respond to your inquiries. For your records, I have attached KeyBank's response to your recently shared concerns. As stated in the attached communication, please let me know if you have any other questions about KeyBank or if I can assist you otherwise. Thank you.

Regards,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, September 23, 2022 4:17 PM  
**To:** [REDACTED]  
**Subject:** Re: CRA Officer-Key Bank

Does this branch have to follow fair lending rules?

Get [Outlook for Android](#)

---

**From:** [REDACTED]  
**Sent:** Friday, September 23, 2022 3:15:41 PM  
**To:** [REDACTED]  
**Subject:** RE: CRA Officer-Key Bank

Good afternoon [REDACTED],

The location you are referencing is a KeyBank Commercial Lending Office. I don't believe it is what you were suggesting, but the Bank does not have any chartered retail banking locations in the Dallas market.

Have a nice weekend,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, September 22, 2022 11:18 PM  
**To:** [REDACTED]  
**Subject:** Re: CRA Officer-Key Bank

Did you confirm you have a branch here in Dallas?

[REDACTED]



President/Chair

[REDACTED]

Southern Dallas Progress Community Development Corporation

*Improving Lives, One Community at a Time*

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]

**Sent:** Friday, July 15, 2022 5:16 PM

**To:** [REDACTED]

**Subject:** Re: CRA Officer-Key Bank

I am sure you are aware of this LPO in Dallas.

KeyBank Real Estate Capital is located at 8117 Preston Rd #400, Dallas, TX 75225.

Also, I am sure you that the Fair Lending rules apply to this LPO.

Last, here is a recent story about LIHTC in Dallas.

<https://www.keranews.org/news/2022-04-18/federal-agency-looking-into-claims-of-racial-discrimination-in-dallas-affordable-housing-projects>



## Federal agency looking into claims of racial discrimination in Dallas' affordable housing projects - KERA News

The federal Department of Housing and Urban Development is investigating a complaint alleging that the City of Dallas' policies and practices steer low-income housing into Black and Latino ...

[www.keranews.org](http://www.keranews.org)

[Redacted]

President/Chair

[Redacted]

Southern Dallas Progress Community Development Corporation

*Improving Lives, One Community at a Time*

[Redacted]

[Redacted]

[Redacted]

---

**From:** [Redacted]

**Sent:** Friday, July 15, 2022 3:20 PM

**To:** [Redacted]

**Subject:** FW: CRA Officer-Key Bank

Good afternoon [Redacted],

I am the Director of CRA at KeyBank. I believe our paths may have crossed recently when I was with my former employer, [Redacted]. How can I assist you?

---

**From:** [Redacted]

**Sent:** Friday, July 15, 2022 11:17 AM

**To:** [Redacted]

**Subject:** FW: CRA Officer-Key Bank

**Importance:** High

Hi [Redacted],

I received the attached email from KeyBank Foundation due to a request they received from a [Redacted] at the Southern Dallas Progress CDC to speak with a CRA contact for his area (Dallas TX). Can you please follow up?

Regards,

[Redacted]

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]





---

**From:** [REDACTED]  
**Sent:** Friday, July 15, 2022 10:18 AM  
**To:** [REDACTED]  
**Subject:** Re: CRA Officer-Key Bank

Hello,

Can you please share the contact information for the person you mentioned during the call?

Thanks

[REDACTED]

President/Chair

[REDACTED]

Southern Dallas Progress Community Development Corporation

*Improving Lives, One Community at a Time*

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, July 15, 2022 9:16 AM  
**To:** [REDACTED]  
**Subject:** RE: CRA Officer-Key Bank

Hello,

Yes, [REDACTED], our Sr. Manager of Corporate Responsibility called and left a message with you on Monday.

You can reach her at [REDACTED]

Thank you,

[Redacted]

---

**From:** [Redacted] >  
**Sent:** Thursday, July 14, 2022 9:03 PM  
**To:** KeyBank Foundation <[KeyBank\\_Foundation@KeyBank.com](mailto:KeyBank_Foundation@KeyBank.com)>  
**Subject:** Re: CRA Officer-Key Bank

Can you please provide the contact information?

[Redacted]

President/Chair

[Redacted]

Southern Dallas Progress Community Development Corporation

*Improving Lives, One Community at a Time*

[Redacted]

[Redacted]

---

**From:** [Redacted]  
**Sent:** Tuesday, July 5, 2022 3:46 PM  
**To:** [Redacted]  
**Subject:** Re: CRA Officer-Key Bank

KeyBank Real Estate Capital is located at 8117 Preston Rd #400, Dallas, TX 75225.

Are you declining to providing with the contact information requested?

[Redacted]

President/Chair

[Redacted]

Southern Dallas Progress Community Development Corporation

*Improving Lives, One Community at a Time*

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]

**Sent:** Tuesday, July 5, 2022 3:43 PM

**To:** [REDACTED]

**Subject:** RE: CRA Officer-Key Bank

Hello,

Unfortunately your geographic area (Dallas, TX) is outside the footprint for KeyBank.

---

**From:** [REDACTED]

**Sent:** Thursday, June 30, 2022 8:28 PM

**To:** [REDACTED]

**Subject:** CRA Officer-Key Bank

**WARNING:** This email originated externally. Exercise caution. Think before clicking links or opening attachments.

Hello,

Can you please provide the contact information for the CRA Officer or "responsible official" for the bank's compliance with the Community Reinvestment Act?

Thanks

[REDACTED]

President/Chair

[REDACTED]

Southern Dallas Progress Community Development Corporation

*Improving Lives, One Community at a Time*

[REDACTED]

[REDACTED]

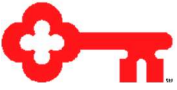
[REDACTED]

KeyCorp Public

This communication may contain privileged and/or confidential information. It is intended solely for the use of the addressee. If you are not the intended recipient, you are strictly prohibited from disclosing, copying, distributing or using any of this information. If you received this communication in error, please contact the sender immediately and destroy the material in its entirety, whether electronic or hard copy. This communication may contain nonpublic personal information about consumers subject to the restrictions of the Gramm-Leach-Bliley Act. You may not directly or indirectly reuse or redisclose such information for any purpose other than to provide the services for which you are receiving the information.

127 Public Square, Cleveland, OH 44114

If you prefer not to receive future e-mail offers for products or services from Key, send an email to <mailto:DNERequests@key.com> with 'No Promotional E-mails' in the SUBJECT line.



**KeyBank**

127 Public Square

Cleveland, OH 44114

September 28, 2022

[REDACTED]  
President/Chair  
Southern Dallas Progress  
[REDACTED]  
[REDACTED]

Re: Email

Dear [REDACTED]:

Thank you for your emails dated June 30, 2022 through September 23, 2022, concerning the KeyBank commercial lending office in Dallas, TX. I appreciate our continued correspondence and value the opportunity to respond to your letter and commend South Dallas Progress's efforts to advocate for the community.

In regard to your question in your September 23, 2022 email, "Does this branch have to follow fair lending rules?"

At KeyBank, we're committed to diversity, equity, and inclusion in all we do. I want to assure you that KeyBank complies and is committed to compliance with the letter and spirit of laws, regulations, and regulatory guidance that relate to fair lending. KeyBank does not discriminate against individuals based on age, race, color, religion, national origin, sex, sexual orientation, veteran status, disability, marital status, familial status (e.g. family size or childbearing intentions), receipt of public assistance income or any exercise of rights under the Consumer Credit Protection Act.

Key's vision as it relates to Fair and Responsible Banking is to be known for providing comprehensive financial solutions to help clients achieve their goals of financial wellness and to be known for its commitment to the communities in which it operates. Key achieves this vision through deeply held values of teamwork, respect, accountability, integrity, and leadership. Key is committed to treating each consumer and customer, including prospective customers, with integrity and respect and to providing quality service that is prompt, competent, diligent, and courteous. Moreover, Key's goal is to help the customer understand available products and services, so that they can make informed financial decisions that are the most appropriate for their circumstances. Integral to this vision is a commitment to fair, consistent, and responsible treatment of Key's consumers and customers.

KeyBank does not have any physical retail banking presence in the City of Dallas or more generally in the State of Texas. While the lack of presence in the Dallas market limits our ability to participate in local community efforts, we would be happy to discuss potential opportunities as Key's vision is to continue to help its clients and communities thrive. KeyBank is dedicated to equity and access, and that dedication is central to the way we do business. We help our neighbors and neighborhoods thrive through a commitment to doing business fairly and responsibly and by making investments in the places where we live and work. KeyBank has earned ten consecutive "Outstanding" Community Reinvestment Act ratings, and as part of our community benefits plan, we delivered more than \$26 billion in lending and investments to increase access and equity for low- and moderate-income clients. We recently expanded the commitment to more than \$40 billion in community benefits.

Please let me know if you have any other questions about KeyBank or if I can assist you otherwise.

Regards,

[Redacted signature]

[Redacted contact information]





*Improving Lives, One Community at a Time*

November 24, 2022

KeyBank National Association  
127 Public Square  
Cleveland, OH 44114-1306

Deputy Comptroller Large Bank Supervision  
Office of the Comptroller of the Currency



**RE: Complaint against Key Bank**

I am submitting this letter to Key Bank 's Community Reinvestment Act (CRA) public file. The undersigned community organization is submitting this letter to file a complaint against Key Bank.

The federal fair lending laws—the Equal Credit Opportunity Act and the Fair Housing Act—prohibit discrimination in credit transactions, including transactions related to residential real estate.

The Equal Credit Opportunity Act (ECOA), which is implemented by the Board's Regulation B (12 CFR 202), prohibits discrimination in any aspect of a credit transaction. It applies to any extension of credit, including residential real estate lending and extensions of credit to small businesses, corporations, partnerships, and trusts.

**Southern Dallas Zip Codes (LMI/High Minority Areas)**

75203, 75207, 75208, 75210, 75211, 75212, 75215, 75216, 75217, 75223, 75224, 75226, 75227, 75228, 75232, 75233, 75236, 75237, 75241, 75249, 75253

**The following sections discuss demographic in the Southern Dallas area.**

- Southern Dallas is home to 43% of all Dallas residents in just 57% of the city's land area.
- Of the 560,000 residents of neighborhoods in southern Dallas, approximately 38% live below poverty - roughly 9% higher than the City's overall poverty rate of 29%.
- Overall, 56% of Dallas residents living below poverty live in the southern neighborhoods of Dallas.
- *The City of Dallas is a unique place. There is a difference between "South Dallas" and "Southern Dallas".*
- *The Southern Sector of Dallas (Southern Dallas) is commonly defined as those areas south of Interstate 30.*
- *The Southern Dallas is 196.7 total square miles. 45% of the City's residents live in Southern Dallas (91% of the residents are minorities in Southern Dallas).*

**Key Bank is not following the Federal Fair Lending Regulations and Statutes in the Southern Dallas.**

<https://www.ffiec.gov/pdf/fairlend.pdf>

Key Bank fails to do any community outreach and marketing efforts to residents and businesses throughout Bank's low-income census tracts, moderate-income census tracts, and major minority census tracts in Southern Dallas.

**Concerns:**

- Key Bank does not have a Loan Production Office located in a low-income census tract in the DFW MSA.
- Key Bank does not have a Loan Production located in a high minority/high poverty<sup>1</sup> census tract in the DFW MSA.
- Key Bank does not originate any commercial loans in low-income census tracts in the DFW MSA.
- Key Bank does not originate any commercial loans in high minority/ high poverty<sup>2</sup> census tracts in the DFW MSA.
- Key Bank does not originate any small business loans to businesses with less than a million dollar in revenue that was in low-income census tracts in the DFW MSA.
- Key Bank does not originate small business loans to businesses with less than a million dollar in revenue that was in high minority/ high poverty census tracts in the DFW MSA.

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<sup>1</sup> High Minority/High Poverty=Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) [https://hudgis-hud.opendata.arcgis.com/datasets/56de4edea8264fe5a344da9811ef5d6e\\_0](https://hudgis-hud.opendata.arcgis.com/datasets/56de4edea8264fe5a344da9811ef5d6e_0)

- Key Bank Loan Production Offices are only located in white-majority neighborhoods, compared to having none in majority-minority neighborhoods<sup>3</sup>

The Dallas–Fort Worth–Arlington metropolitan statistical area's population was 7,573,136 according to the U.S. Census Bureau's 2019 population estimates, making it the most populous metropolitan area in both Texas and the Southern United States, the fourth largest in the U.S., and the tenth largest in the Americas. The Dallas–Fort Worth metroplex has over one million African-American and the second-largest metro population of African-Americans in Texas.

**Key Bank engages in unlawful discrimination by acting to meet the credit needs of majority-White neighborhoods in the Dallas-Fort Worth Metropolitan Statistical Area ("DFW MSA" or "MSA") while avoiding the credit needs of majority-minority neighborhoods.**

*Dallas is a majority minority city (66.1 percent of population) with 41.8 percent of residents identifying as Hispanic and 24.3 percent identifying as Black.*

*Dallas is a city with a population of just under 1,344,000, including 24.3 percent African American residents, 41.8 percent Hispanic/Latinx residents, and 3.4 percent Asian residents; and 30.5 White (Non-Hispanic)*

*With 2,622,634 people, Dallas County is the 2nd most populated county in the state of Texas out of 254 counties. The largest Dallas County racial/ethnic groups are Hispanic (40.2%) followed by White (28.6%) and Black (22.3%).*

### **Equal Credit Opportunity Act (ECOA) and Fair Housing Act (FHA)**

Key Bank violates Equal Credit Opportunity Act (ECOA) and the Fair Housing Act (FHA) by discriminating against African Americans and other minority consumers. The Equal Credit Opportunity Act (ECOA) prohibits lenders from discriminating based on race and other characteristics.

As both the Equal Credit Opportunity Act (ECOA) and the Interagency Fair Lending Examination Procedures remind us, "A creditor shall not discriminate against an applicant regarding any aspect of a credit transaction"; **this includes small business and commercial lending.**

In terms of the discrimination, we assert that Key Bank does engage in the following:

- Made no efforts to market to African Americans and/or Hispanics in Southern Dallas
- Does not specifically target any marketing toward Hispanic and/or African Americans in the DFW MSA and specifically Southern Dallas
- Does not employ an African American and/or Hispanics commercial and/or mortgage loan officers in the DFW MSA
- Received few applications from African Americans & Hispanics in the DFW MSA

---

<sup>3</sup> DOJ Redlining Cases/ Few or no branches; <https://www.fhcci.org/wp-content/uploads/2013/08/Jonathan-Bont-Redlining.pdf>

- Received almost no applications from applicants for properties located in African American and Hispanic Low to Moderate Income neighborhoods in the DFW MSA
- Made a smaller percentage of HMDA-reportable residential mortgage loans in majority-Black and Hispanic neighborhoods compared to its peers in the DFW MSA

Regulation B, the ECOA's implementing regulation, provides that a creditor shall not make any oral or written statement, in advertising or otherwise, to applicants or prospective applicants that would discourage on a prohibited basis a reasonable person from making or pursuing an application. But the ECOA itself does not set forth such a prohibition.

### **Dallas Loan Production Office Location**

8117 Preston Rd #400, Dallas, TX 75225

### **Products available for the Underserved/Minority Communities**

Access to affordable credit is a key component of an individual's ability to cultivate a strong financial position and participate fully in the DFW economy. The Equal Credit Opportunity Act of 1974 was passed to protect all consumers, yet the effects of the discrimination endure today.

Key Bank does not have any special-purpose credit programs to address their disparities in small business lending in underserved high minority communities like Southern Dallas.

- <https://www.consumerfinance.gov/about-us/newsroom/consumer-financial-protection-bureau-issues-advisory-opinion-to-help-expand-fair-equitable-and-nondiscriminatory-access-to-credit/>
- [https://www.hud.gov/sites/dfiles/GC/documents/Special Purpose Credit Program OGC guidance 12-6-2021.pdf](https://www.hud.gov/sites/dfiles/GC/documents/Special_Purpose_Credit_Program_OGC_guidance_12-6-2021.pdf)
- [12 CFR § 202.8 - Special purpose credit programs.](#)
  - <https://www.ffiec.gov/PDF/fairlend.pdf>

### **Lack of Staff Diversity**

Key Bank does not have any African Americans and/or Hispanics on the DFW MSA Leadership Team.

Key Bank does not have any Commercial Loans Officers in the DFW MSA that are African Americans and/or Hispanics.

*The DFW MSA is majority minority.*

### **Key Bank is not a member of any of the Minority Trade Organizations below:**

<https://regionalhca.org/>

<https://www.namcdfw.org/>

<https://blackcontractors.org/>

<https://aacatx.com/>

**Key Bank is not a member of any of the Minority Chambers below:**

<https://dallasblackchamber.org/>

<https://arlingtonblackchamber.org/>

<https://fwmbcc.org/>

<https://fwhcc.org/>

<https://www.gdhcc.com/>

**Discrimination/Redlining Cases**

*Justice Department and Office of the Comptroller of the Currency Announce Actions to Resolve Lending Discrimination Claims Against Cadence Bank*

<https://www.justice.gov/opa/pr/justice-department-and-office-comptroller-currency-announce-actions-resolve-lending>

*CFPB Files First Ever Redlining Complaint Against a Non-Bank Mortgage Lender*

<https://www.consumerfinance.com/2020/07/20/cfpb-files-first-ever-redlining-complaint-against-a-non-bank-mortgage-lender/>

*Regulation B prohibits discouragement of “applicants or prospective applicants”. Specifically, it states: “A creditor shall not make any oral or written statement, in advertising or otherwise, to applicants or prospective applicants that would discourage on a prohibited basis a reasonable person from making or pursuing an application.” The Official Interpretations of Regulation B also explain that this prohibition “covers acts or practices directed at prospective applicants that could discourage a reasonable person, on a prohibited basis, from applying for credit.”*

*In the course of conducting supervisory activity, examiners observed that a lender violated ECOA and Regulation B by engaging in acts or practices directed at prospective applicants that would have discouraged reasonable people in minority neighborhoods in Metropolitan Statistical Areas (MSAs) from applying for credit.*

[https://files.consumerfinance.gov/f/documents/cfpb\\_supervisory-highlights\\_issue-24\\_2021-06.pdf](https://files.consumerfinance.gov/f/documents/cfpb_supervisory-highlights_issue-24_2021-06.pdf)

*DOJ, CFPB, and OCC announce aggressive redlining initiative; take action against national bank for alleged lending discrimination*

<https://buckleyfirm.com/blog/2021-10-26/doj-cfpb-and-occ-announce-aggressive-redlining-initiative-take-action-against-national-bank-alleged-lending-discrimination>

**Conclusion**

The CRA regulation is very clear — a finding that a bank failed to comply with laws on fair and responsible lending trumps otherwise satisfactory or even outstanding CRA performance. The CRA regulations specifically state that a rating will be "adversely affected by evidence of discriminatory or other illegal credit practices," including but not limited to violations of the Equal Credit Opportunity Act, the Fair Housing Act, the Home Ownership and Equity Protection Act, the Federal Trade Commission Act, the Real Estate Settlement Procedures Act, and the Truth in Lending Act.

Sincerely,



Southern Dallas Progress Community Development Corporation

### **Research on DFW MSA Community Needs**

*Dallas has a housing shortage of approximately 20,000 units.*

<https://dallascityhall.com/departments/housing-neighborhood-revitalization/DCH%20Documents/Adopted%20Housing%20Policy.pdf>

North Texas Regional Housing Assessment

<https://dhantx.com/report/north-texas-regional-housing-assessment/>

Dallas' Small Business Ecosystem Assessment

<https://www.dallasecodev.org/DocumentCenter/View/2789/Dallas-Small-Business-Ecosystem-Report-PDF>

Report on Housing Affordability and Vulnerability in Dallas, Texas

<https://nalcab.org/nalcab-releases-report-on-housing-affordability-and-vulnerability-in-dallas-texas/>

FINDING G: MINORITY OWNED BUSINESSES ACCESS TO CREDIT/CAPITAL ANALYSIS (CHAPTER 6)

<https://dallascityhall.com/departments/public-affairs-outreach/DCH%20Documents/availability-disparity-study.pdf>



January 6, 2023

[REDACTED]  
Southern Dallas Progress

[REDACTED]  
Office of the Comptroller of the Currency  
Large Bank Supervision Constitution Center

[REDACTED]  
Re: Complaint against KeyBank

Dear [REDACTED]:

Thank you for your letter dated November 24, 2022, concerning KeyBank's operations in the Dallas market. As previously stated, we appreciate the opportunity to respond to your letter and commend the efforts of Southern Dallas Progress to advocate for the community.

KeyBank is committed to diversity, equity, and inclusion in all we do and complies with both the letter and spirit of fair lending laws, regulations, and regulatory guidance. KeyBank does not discriminate against individuals based on age, race, color, religion, national origin, sex, sexual orientation, veteran status, disability, marital status, familial status (e.g., family size or childbearing intentions), receipt of public assistance income, or any exercise of rights under the Consumer Credit Protection Act.

While we have not substantiated the allegations brought forth in your communication, we offer the following facts and observations regarding our presence in the Dallas community:

- KeyBank does not have any physical retail banking presence nor any mortgage lending offices in the City of Dallas or, more generally, in the State of Texas. As it pertains mortgage lending, our activities in the Dallas market are driven by Laurel Road, a digital brand of KeyBank, and a small portfolio of loans secured by customers with a banking relationship in our retail footprint. Despite our limited presence, in 2021 KeyBank exceeded or performed similarly to peer banks in mortgage lending to low- and moderate-income census tracts and borrowers.
  - In 2021, 11.1% of KeyBank's loans in Dallas County were originated in low-income census tracts, compared to only 8.2% by all other lenders.
  - In 2021, 33.3% of KeyBank's loans in Dallas County were originated in low- and moderate-income census tracts, compared to 33.1% by all other lenders.
  - In 2021, 22.2% of KeyBank's loans in the Dallas County were originated to moderate-income borrowers, compared to 16.1% by all other lenders.

- In 2021, KeyBank committed to almost \$11.5 million in affordable housing loans in the City of Dallas. Year to date, KeyBank has invested \$27,319,250.00.
  - KeyBank holds 23.5% of the Raymond James Preservation Opportunities Fund VIII, with a lower tier investment in Carpenter’s Point Active Adult Living. Carpenter’s Point is a 150-unit Senior property located in a moderate-income census tract in Dallas, TX, which includes 38 units at 30% Area Median Income (AMI), 23 at 50% AMI and 89 units at 60% AMI. The fund has an equity commitment of \$6,274,000.00 specific to this property. This property resides in the zip code 75223, which is one of the majority minority areas you mention in your letter.
- Since 2021, KeyBank staff assigned to the Dallas market have performed over 300 community service hours in the Dallas community, including three (3) different events on our annual day of service, Neighbors Make the Difference Day. Our teammates volunteered their time and talent to organizations including the North Texas Food Bank, Buckner Shoes for Orphan Souls, and Dallas Life.

As offered in our September 28, 2022, communication with you, we would be happy to discuss potential opportunities as Key’s purpose is to continue to help its clients and communities thrive. KeyBank is dedicated to equity and access, and that dedication is central to the way we do business.

Sincerely,

████████████████████  
████████████████████████████████████████



[REDACTED]

**From:** GRC Administration <noreply\_grc@keybank.com>  
**Sent:** Friday, October 28, 2022 1:19 PM  
**To:** [REDACTED]  
**Subject:** New Referral Created

A referral has been received and has been referred to you for resolution. Please access GRC to respond and close.

Case ID: [10620642](#)

Notes:

Good day,

I wanted to make you aware of a complaint we received in the Executive Offices from the Consumer Financial Protection Bureau that contains the language highlighted below. Please review and advise within 48 business hours.

The following is a synopsis of the client's complaint and any supporting research we were able to find.

**GRC Case#: 10620642**

[REDACTED]

**CFPB Complaint (in the client's words):**

"I have filed complaints with Civil Rights 2022, 2021 Federal bankruptcy to reopen for violating bankruptcy and retaliation against during co-vid19 that left me homeless. I have reported the actions to federal trade and other government agencies. I only had indirect loans with KeyBank National Association through Cleveland Housing Network's first-time Homeward program market to single African- American with kids. KeyBank misrepresented the mortgage relationship to be direct and has illegally used my mortgage information against me and my bankruptcy discharge court order by pretexting the mortgage as a direct loan in connection with mortgage services PHH Mortgage, Bank of America, and Amos Financial LLC. These companies worked together and collected funds unlawfully with the intent to harm and cause finical injury that left me homeless in August 2022, after KeyBank went against the September 2021 bankruptcy pretrial and forged my name on a note in 2021 in the court appeal. KeyBank knew that the mortgage notes 74, 100k had a statute of limitation and that mortgage documents provided to the court of appeal were inconsistent with the original TIL signed in 2001. In 2019 bankruptcy noted that the mortgage would be considered void under bankruptcy discharge court orders in 2008 and 2019. In September 2021, I requested federal bankruptcy to reopen the case for violating the bankruptcy code. 2022 Therefore, I interpret the letter (incident report); I received from KeyBank about credit as a threat and retaliation against me because I filed to reopen my Chapter 7 Bankruptcy case. This case relates to the unlawful seizure of my property that KeyBank never owned because; then my debt was discharged and paid off. Taken unlawfully during the midst of the federal moratorium Covid-19 pandemic, my house that KeyBank claimed was transferred during the bankruptcy proceeding as being serviced by Amos Financial LLC and further claimed that they brought a loan from a pool. The mortgage debt that KeyBank took misrepresented and untrue delinquent loans because the original document that I signed at the Cleveland Housing Network Homeward program during the 2001-2002 closing declared the loan had no assumption. The mortgage procedure of foreclosure was a form of retaliation against my bankruptcy discrimination after I made reports through consumer protection 2016-2021. Therefore, **KeyBank appears to engage in a nationwide scheme that takes advantage of low-and-moderate income consumers like me through the Homeward program.** False Promises and Misrepresentations Related to the Extension of Loan and Insurance Products to Ohio Consumers (False Promises, Misrepresentations) of the save the Dream program. Failure to Make Required Disclosures Prior

to Consummation of the Loan after receiving funding through the federal crisis program retaliated against me for filing chapter 7 bankruptcy basis of Discrimination and retaliation. Lender unlawfully and unreasonably went against the Consumer Protection Act: Unfair and Deceptive Acts and Practices Related to the Extension of Loans modification program that had clear debt and Insurance, Including Charging for Add-Ons Without Consumers' Consent through the MER system, Concealing Commissions, and Loan Flipping through Mortgage service during a time of the state of emergence and federal moratorium.

DESIRED RESOLUTION: Replace and/or return my home and refund the money that left me homeless, as I have the right to pursue all parties involved for violating and interfering with my civil rights. I have stood through prayer and sought justice."

**Research:**

- There have been several previous cases reviewed and addressed by ECR previously (case summary for each attached):
  - GRC 536915 – 10/27/16
  - GRC 5896790 – 6/8/17
  - GRC8038828 – 1/7/19
  - GRC 10228997 – 2/28/22 (CFPB complaint attached)
- For the most recent case opened in February, there was a referral that involved Foreclosure (attached) in which it was stated loan was sold to Amos Financial (in late 2019 / early 2020) and we were unable to speak to their claims.

**Complaints Compliance has reviewed the previous case as well as this new complaint filing and advised:**

- This loan was sold a few years ago and we no longer have any involvement.
- It appears complainant had at least one bankruptcy and some civil actions filed against us previously. There was also at least one complaint filed with the Ohio Civil Rights Commission that appears to have been dismissed (lack of jurisdiction/untimely).
- Because of the legal actions involved they had discussed the last CFPB response (attached, dated 3.30.22) with [REDACTED]. He reviewed and had approved that response letter.
- They are willing to discuss this matter on a conference call if you feel that would be beneficial. Let me know, and I can arrange the invite.

In order to appropriately review and respond to the client's concerns, please let us know of any questions, concerns, or if a CRA-relevant response is required.

If you have any additional questions or concerns, please feel free to contact me.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Referral ID: [10630382](#)



**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

November 18, 2022

[REDACTED]  
[REDACTED]  
[REDACTED]

RE: [REDACTED]  
[REDACTED]  
KeyBank Case No. 10620642

Dear [REDACTED]

This letter is in response to your concern filed with the Consumer Financial Protection Bureau (“CFPB”). We would like to share the results of our review.

We determined KeyBank addressed your foreclosure concerns pertaining to the account listed above on January 24, 2019. I have enclosed the letter that was provided to the CFPB on that date which details no errors were found and that foreclosure proceedings had resumed on January 8, 2019. Regarding what is mentioned in your CFPB filing about what has transpired since January 2019, as previously stated on the enclosed letter provided to the CFPB on March 7, 2022, we are unable to advise on these concerns as the mortgage is no longer housed at KeyBank. We kindly recommend contacting Amos Financial LLC.

At KeyBank, we’re committed to diversity, equity, and inclusion in all we do. Please be advised that we take discrimination claims seriously, and I want to assure you that KeyBank complies with all Federal and State anti-discrimination laws in addition to our own internal policies regarding discrimination. KeyBank does not discriminate against individuals based on age, race, color, religion, national origin, sex, sexual orientation, veteran status, disability, marital status, familial status (e.g. family size or childbearing intentions), receipt of public assistance income or any exercise of rights under the Consumer Credit Protection Act. Lastly, please be assured that KeyBank takes its Community Reinvestment Act (CRA) responsibilities seriously. For more information on how KeyBank invests in its communities and helps clients and communities thrive, please visit: <https://www.key.com/about/corporate-responsibility/corporate-responsibility-reporting.jsp>.

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TDD/TTY device, please call 1-800-539-8336. We are available Monday through Friday from 8am to 7pm Eastern time.

Thank you for allowing us the opportunity to review and address your concern.

Sincerely,



Enterprise Client Relations  
Office of the President

Attachments

CFPB Letter – January 24, 2019

CFPB Letter – March 30, 2022

High-Risk: ECR - goes to next state in 34 hours - Assigned to [CLF] ECR Team NEW



[Redacted]

December 20, 2022, 5:51 PM EST

[0 subscribers](#)

- [Respond](#)
- [Reassign Alert](#)
- [Close Alert](#)
- [Add Note](#)
- [Subscribe](#)

### Profile

#### Customer Information

Client ID	[Redacted]
Email	[Redacted]
Age (Branch/ATM)	[Redacted]
Associate ID	[Redacted]
Associate Name	[Redacted]
ATM / Branch ID	[Redacted]
Branch/ATM Transaction Type	[Redacted]
Client Type	[Redacted]
Customer Type Export	[Redacted]
Employee Type	[Redacted]
Gender	[Redacted]
Line of Business	[Redacted]
Tenure	[Redacted]
Transaction Date (ET)	[Redacted]
Transaction Description	[Redacted]
Transaction ID	[Redacted]
Transaction Product	[Redacted]

#### Metadata Information

Response Date (ET)	12/20/2022, 05:51 PM
Survey ID	[Redacted]
IPI	[Redacted]
Transaction ID	[Redacted]
Unit	[Redacted]
Client IPI	[Redacted]
Survey Program	[Redacted]
Unique Id	[Redacted]

### Activity

- Alert Assigned**  
12/20/2022, 5:53:33 PM EST · System Generated  
Automatically assigned to [CLF] ECR Team
- Alert status set to New**  
12/20/2022, 5:53:33 PM EST · System Generated
- Alert Assigned**  
12/20/2022, 5:53:33 PM EST · System Generated  
Automatically assigned to [CLF] ECR Team
- Alert status set to New**  
12/20/2022, 5:53:33 PM EST · System Generated
- Alert Created: High-Risk: ECR**  
12/20/2022, 5:53:29 PM EST · System Generated  
High-Risk: ECR

[View Less](#) ^

Score Report

Net Promoter Scores

Branch NPS  8

Associate Drivers

Satisfaction with Associate  10

Addressed by Name  Yes  No

Others

Needs Not Addressed  Yes  No

Flex Question  Yes, I would like to continue with the survey  No, I would like to submit the survey

Client Interacted With  Teller  Teller at Drive Up  
 Employee other than teller (Branch Manager, Personal Banker, Financial Wellness Consultant)

Trying To Resolve An Issue  Yes  No

Segments


Segments

Transaction Product  
CHECKING/MONEY MARKET

Transaction Description  
Deposit

Investable Asset Level  
>\$1MM

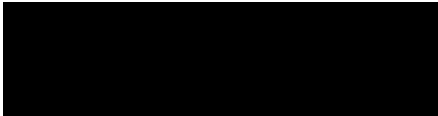
Verbatims

 Reason for Likelihood to Recommend Comment  
The personnel are pleasant , I don't use Key Bank often because in my time it has gone from Marine Midland to HSBC to First Niagara to Key, I'll wait a few more years to see if Key stays around before doing my major banking there .  
Also, in Highland Falls , Key left , there is only Chase remaining



**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

January 20, 2023



Re:

Key Case No. 2DTKM9



Thank you for contacting us regarding your recent concern related to the Highland Falls branch closure or consolidation. This location consolidated with the Vails Gate branch May 3, 2019.

KeyBank is committed to a strong branch network in the communities we serve tailored to client convenience and preference. We know that while mobile and online options offer tremendous speed and convenience, many clients still want to sit down, face-to-face with our branch professionals to discuss more complex banking needs.

Like any other business, KeyBank continually reviews the structure of its organization to maintain a strong position in the marketplace and remain profitable while continuing to serve the financial needs of our clients. The decision to close or consolidate a branch may be based on decreased client foot traffic due to increased online/mobile banking usage and/or proximity to another KeyBank branch.

KeyBank is committed to making this transition as smooth as possible for our clients. Clients can expect to continue to receive the same high level of service from KeyBank at other nearby branches and will continue to have access to KeyBank's ATM network, telephone banking at 1-800-KEY2YOU, online banking via the internet at key.com, and mobile banking.

Lastly, please be assured that KeyBank takes its Community Reinvestment Act (CRA) responsibilities seriously. KeyBank is proud of its Outstanding ratings, which reflect our ongoing commitment to serving our communities and neighbors. For more information on how KeyBank invests in its communities and helps clients and communities thrive, please visit: <https://www.key.com/about/corporate-responsibility/corporate-responsibility-reporting.jsp>

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TDD/TTY device, please call 1-800-539-8336. We are available Monday through Friday from 8am to 7pm Eastern time.

Sincerely,



Enterprise Client Relations  
Office of the President



Unresolved Problem - Digital - goes to next state in 6 hours - Assigned to [CLF] ECR Team

IN PROGRESS



1/10



October 20, 2022, 4:00 PM EST

[0 subscribers](#)

Respond

Reassign Alert

Close Alert

Add Note

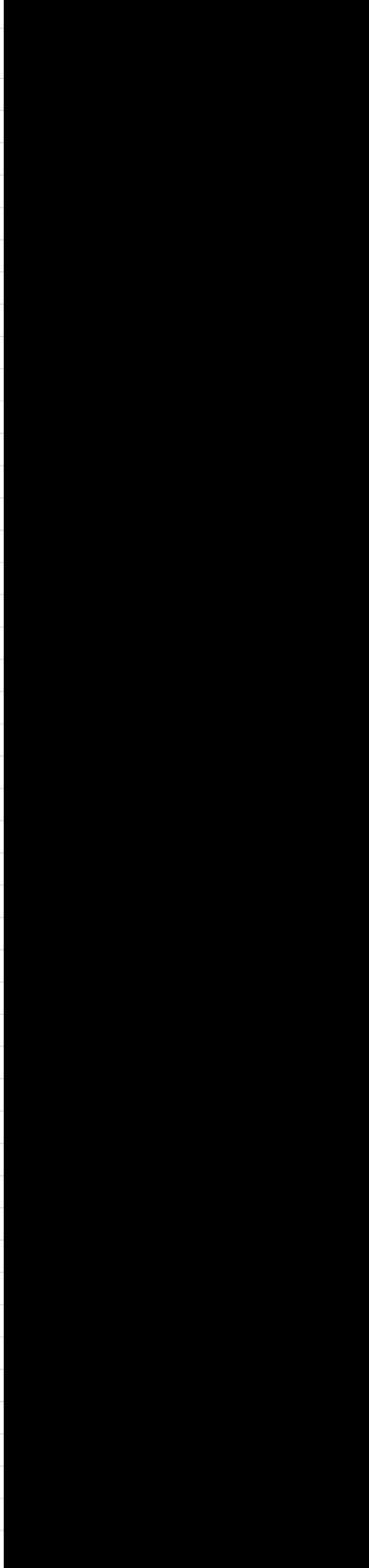
Subscribe

Empty content area for the alert details.

**Profile**

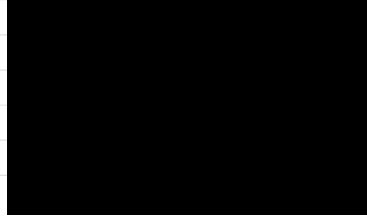
Customer Information

- Business Platform
- Channel Type (Online Banking / Mobile App / Key Navigator)
- Consumer Digital Unit
- CUSTOMER ID
- Digital Intra text
- Individual or Organization
- P3 Flag
- Relationship Segment
- Session Length
- Transaction Status
- Digital NPS
- Ease of Doing Business
- Branch of Assignment
- Business Checking Flag
- Business Credit Card Flag
- Checking Flag
- Client Age
- Customer DNS Election
- Customer Type
- Digital Platform
- KeyCashFlow Flag
- Language
- NAICS Code
- NAICS Description
- Positive Pay Flag
- Primacy Checking Flag
- Primacy Flag
- Primary RM Code
- RDC Flag
- Savings Flag
- Transaction Count
- Transaction Time
- Transaction Time
- Woman Owned
- Email
- Focus Industry Verticals
- Investable Asset Level
- Transaction Date (ET)
- Transaction ID
- Annualized Revenue
- Branch of Assignment
- Digital 3b Flag
- Tenure
- Tenure Text
- Customer ID
- Business Segment
- Transaction Description
- Transaction Event Code



Metadata Information

- Response Date (ET) 10/20/2022, 04:00 PM
- Survey ID
- IPI
- Customer IPI
- Transaction ID
- Unit
- Survey Program



### Activity

- Note Added**  
10/21/2022, 11:35:37 AM EST - [REDACTED] [CLF] Customer Advocacy Team  
Reassigning to ECR due to the language used
- Alert Assigned**  
10/21/2022, 11:35:32 AM EST - [REDACTED] [CLF] Customer Advocacy Team  
Assigned to [CLF] ECR Team by [REDACTED]  
Message:  
Reassigning to ECR due to the language used
- Alert Assigned**  
10/21/2022, 9:39:13 AM EST - [REDACTED] [CLF] Customer Advocacy Team  
Assigned to [REDACTED]
- Alert Assigned**  
10/20/2022, 4:21:02 PM EST - System Generated  
Automatically assigned to [CLF] Customer Advocacy Team
- Alert status set to New**  
10/20/2022, 4:21:02 PM EST - System Generated
- Alert Created: Unresolved Problem - Digital**  
10/20/2022, 4:20:54 PM EST - System Generated  
Unresolved Problem - Digital

[View Less](#) ^

### Score Report

#### Net Promoter Scores

Digital NPS  1


#### Digital

Digital NPS  1

Preferred Contact Method  Yes - Please contact me via phone  Yes - Please contact me via email  No

Did you experience any problems?  Yes  No

Channel Type (Online Banking / Mobile App / KeyNavigator)  Online Banking Service  Mobile App  KeyNavigator

Overall Digital Satisfaction  1

Ease of Doing Business  1

Satisfaction with Speed  1

Satisfaction with Accessibility  1

Satisfaction with Ease of Navigating  1

Satisfaction with Appearance  7

Impact of Problem  Minor  Moderate  Severe

Satisfaction with Understanding Features  7

Individual or Organization  Individual  Organization

Satisfaction with Range of Services  1

Recall using KeyBank's Digital Banking  Yes  No  Don't Know

Satisfaction with Information Clarity  7

Has Problem Been Resolved  Yes  No

#### Contact Method



Yes - Please contact me via phone  Yes - Please contact me via email  No

**Segments**

**Segments**

Focus Industry Verticals  
Contractors

**Verbatims**



Improvement for family

Become more user friendly. Keep the branches in the towns where clients can actually walk to the branches. Key is closing down the local branches that serve small communities where senior citizens walk to bank.

Range of services reason

Key Mobile is NOT business friendly.

Problem reason

Constantly get messages like....unable to ready signature on back of check. I have an ink pad. Terrible.



**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

December 2, 2022



Re: Key Case No. 10626101



Thank you for contacting us regarding your recent concern related to the Slatington and Palmerton branch closures or consolidations.

KeyBank is committed to a strong branch network in the communities we serve tailored to client convenience and preference. We know that while mobile and online options offer tremendous speed and convenience, many clients still want to sit down, face-to-face with our branch professionals to discuss more complex banking needs.

Like any other business, KeyBank continually reviews the structure of its organization to maintain a strong position in the marketplace and remain profitable while continuing to serve the financial needs of our clients. The decision to close or consolidate a branch may be based on decreased client foot traffic due to increased online/mobile banking usage and/or proximity to another KeyBank branch.

KeyBank is committed to making this transition as smooth as possible for our clients. Clients can expect to continue to receive the same high level of service from KeyBank at other nearby branches and will continue to have access to KeyBank's ATM network, telephone banking at 1-800-KEY2YOU, online banking via the internet at key.com, and mobile banking. For clients using a TDD/TTY device, please call 1-800-539-8336. Our clients have many options to connect with KeyBank when, where, and how they prefer.

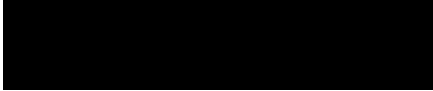
Also, your concern regarding KeyBank's business online banking limits and endorsement errors has been brought to our attention. The daily limit for mobile deposit is \$20,000 and \$80,000 in any 30-day rolling period. We hope you will find this amount sufficient for your banking needs. Our records show that you are having difficulties when attempting to make a mobile deposit. The error that is occurring is that the app is unable to correctly read the endorsement on the back of the check. Should this difficulty continue, please retake the image of the endorsement, and try to make the deposit again.

Lastly, please be assured that KeyBank takes its Community Reinvestment Act (CRA) responsibilities seriously. KeyBank is proud of its Outstanding ratings, which reflect our ongoing commitment to serving our communities and neighbors. For more information on how KeyBank invests in its communities and helps clients and communities thrive, please visit: <https://www.key.com/about/corporate-responsibility/corporate-responsibility-reporting.jsp>

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TDD/TTY device, please call 1-800-539-8336. We are available Monday through Friday from 8am to 7pm Eastern time.



Sincerely,



Enterprise Client Relations  
Office of the President



Unresolved Problem - Branch - goes to next state in 6 hours - Assigned to [CLF] ECR Team ESCALATED

9/10 September 16, 2022, 2:21 PM EST

[0 subscribers](#)

Respond 
Reassign Alert
Close
Add
Subscr

P, r o f

Customer Information

Client ID	[REDACTED]
Email	[REDACTED]
Age (Branch/ATM)	[REDACTED]
Associate ID	[REDACTED]
Associate Name	[REDACTED]
ATM / Branch ID	[REDACTED]
Branch/ATM Transaction Type	[REDACTED]
Client Type	[REDACTED]
Customer Type Export	[REDACTED]
Employee Type	[REDACTED]
Gender	[REDACTED]
Line of Business	[REDACTED]
Tenure	[REDACTED]
Transaction Date (ET)	[REDACTED]
Transaction Description	[REDACTED]
Transaction ID	[REDACTED]
Transaction Product	[REDACTED]

Metadata Information

Response Date (ET)	09/16/2022, 02:21 PM
Survey ID	[REDACTED]
IPI	[REDACTED]
Transaction ID	[REDACTED]
Unit	[REDACTED]
Client IPI	[REDACTED]
Survey Program	[REDACTED]
Unique Id	[REDACTED]

A, c t i v

- Alert**  
09/22/2022, 3:15:53 PM EST - [REDACTED] [CLF] Branch/ATM Team  
Assigned to [CLF] ECR Team by [REDACTED]  
**Message:**  
reassigning due to consolidation/discrimination claim
- Alert**  
09/16/2022, 2:17:29 PM EST - System Generated
- Alert**  
09/16/2022, 3:16:52 PM EST - System Generated  
Over-Profile
- Alert**  
09/16/2022, 2:41:20 PM EST - System Generated  
Automatically assigned to [CLF] Branch/ATM Team
- Alert\_status**  
09/16/2022, 2:41:20 PM EST - System Generated
- Alert Created: Unresolved**  
09/16/2022, 2:40:34 PM EST - System Generated  
Unresolved Problem - Branch

[View](#)

Score

Net

Branch NPS  9

Associate

Satisfaction with Associate  10

Warm Welcome  10

Easy to do Business  10

Genuine Thank You  10

Addressed by Name  Yes  No

Other

Needs Not Addressed  Yes  No

Flex Question  Yes, I would like to continue with the survey  No, I would like to submit the survey

Problem impact  Minor  Moderate  Severe

Problem resolved  Yes  No

Interacted With  Teller  Teller at Drive Up  Employee other than teller (Branch Manager, Personal Banker, Financial Wellness Consultant)

Reason for call  Yes  No

Preferred Contact Method  Yes - Please contact me via phone  Yes - Please contact me via email  No

Segments

Transaction Product  
CHECKING/MONEY MARKET

Transaction Description  
Deposit

Investable Asset Level  
\$50k to \$100k

Verbat

 Reason for Likelihood to Recommend Comment  
I would've gave y'all a 10. But y'all are closing down that branch and all them senior citizens that need that branch will be closed. I Think that's wrong.

Problem reason  
You are closing that branch. Maybe the young youth don't care. But the seniors do. They don't want to go to Huntington they want to go to Keybank with the same people that works there. But my opinion doesn't matter. Keybank do not care about Older customers. So take care



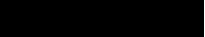


**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

December 7, 2022



Key Case No. 10564313

Dear 

Thank you for contacting us regarding your recent concern related to local branch closures.

KeyBank is committed to a strong branch network in the communities we serve tailored to client convenience and preference. We know that while mobile and online options offer tremendous speed and convenience, many clients still want to sit down, face-to-face with our branch professionals to discuss more complex banking needs.

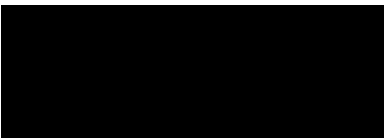
Like any other business, KeyBank continually reviews the structure of its organization to maintain a strong position in the marketplace and remain profitable while continuing to serve the financial needs of our clients. The decision to close or consolidate a branch may be based on decreased client foot traffic due to increased online/mobile banking usage and/or proximity to another KeyBank branch.

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In addition, At KeyBank, we're committed to diversity, equity, and inclusion in all we do. Please be advised that we take discrimination claims seriously, and I want to assure you that KeyBank complies with all Federal and State anti-discrimination laws in addition to our own internal policies regarding discrimination. KeyBank does not discriminate against individuals based on age, race, color, religion, national origin, sex, sexual orientation, veteran status, disability, marital status, familial status (e.g. family size or childbearing intentions), receipt of public assistance income or any exercise of rights under the Consumer Credit Protection Act.

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TDD/TTY device, please call 1-800-539-8336. We are available Monday through Friday from 8am to 7pm Eastern time.

Sincerely,



Enterprise Client Relations  
Office of the President



## Executive Client Relations

---

**From:** KBM Client Complaints  
**Sent:** Friday, September 16, 2022 12:47 PM  
**To:** Executive Client Relations  
**Cc:** [REDACTED]  
**Subject:** Home Lending High Risk Complaint [REDACTED]

**Attachments:** [REDACTED]

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** new case

Hello ECR Team,

KBM Client Complaints has received the following high risk complaint and we would request that you review the complaint, open a case and contact our client.

### Client Information

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

### Application/ Loan Information

<b>System + App or Acct Number(s)</b>	[REDACTED]
<b>Scenario</b>	Purchase
<b>Product/ Term</b>	To Be Determined
<b>Status</b>	In Origination

### Related KeyBank Employee Information

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

### Complaint Information

<b>Critical Deadline(s)?</b>	Client needs product information asap since the seller's agent needs a response
<b>Date of Client Escalation</b>	9/15

<b>Date Rec'd by KBM Complaints</b>	9/15
<b>Contact Method</b>	Client escalated to Home Lending Leader
<b>Summary of Complaint</b>	Client is requesting additional documentation of loan product procedures
<b>High Risk Language</b>	Client claims that the banks practices are predatory, discriminatory and illegal.
<b>Client's Desired Resolution</b>	Additional documentation to what she has already received regarding loan products
<b>Current status of the complaint from the client's perspective?</b>	Waiting for a response to her request
<b>Preliminary Research and Feedback from KBM Complaints</b>	Email chains are attached with the client, loan officer and home lending leader

Requested From Executive Client Relations

**If procedurally permitted, please contact our client by phone and interview them about their experience.** Please fill in as much detail as possible from our client's perspective and seek to learn what the path to resolution is from their standpoint.

<u>Question</u>	<u>Guidance</u>	<u>ECR PLEASE COMPLETE</u>
<b>What would you add to our summary above?</b>		
<b>What did the client say that their desired resolution was?</b>	<i>Just an apology or a call from a manager? Employee coaching or discipline? Rate, fee or term change prior to close? Refund of fee? Other compensation or reimbursement? Credit bureau revision? Do they require a response in writing?</i>	
<b>Is our client threatening further action if not resolved to their satisfaction?</b>	<i>e.g. lawsuit, contact regulator, contact executives, social media, news media, etc.</i>	
<b>Can our client share documentation supporting their concerns?</b>	<i>Please attach. E-mails, text messages, receipts for expenses, etc.</i>	
<b>Did our client receive their initial disclosure package for their loan? Do they understand their disclosures?</b>	<i>For rate and term issues, did the client receive and read their disclosures? For Application Processing Fee Deposits, did the client read the disclosure where it is explained to be non-refundable?</i>	
<b><u>When</u> does the client expect to hear back from someone at Key?</b>	<i>Be sure to set reasonable expectations for your/ our next follow-up.</i>	

<b>Who does the client expect to contact them next?</b>	<i>Typically ECR SPOC. May be MLO or Home Lending Leader or someone else for certain scenarios.</i>	
<b>What else do you need KBM Client Complaints to research or answer?</b>		

To help us provide “crazy good service”, please update the gray boxes above and add any other information that will help us to further research and determine our LOB resolution.

<<<<Special Request from Executive Client Relations>>>>

<<<<i.e. if you agree, please engage employee relations, compliance, privacy, legal, sales practices, etc. in accordance with your procedures.>>>>

Once received, we will work to complete our research and provide our resolution decision.

Please don't hesitate to call with any questions.

Thank you

[Redacted signature block]




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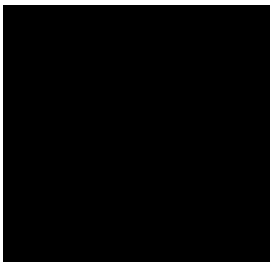
**From:** [Redacted]  
**Sent:** Thursday, September 15, 2022 4:21 PM  
**To:** KBM Client Complaints <kbm\_client\_complaints@keybank.com>  
**Subject:** [Redacted]

Just a FYI I just spoke with the borrower. She is stating that none of the qualifications were discussed with her on the Key Community program.

I am working on getting the email chain between the LO and the borrower now.

Sincerely,

[Redacted signature block]



KeyBank 

---

**From:** [REDACTED]  
**Sent:** Thursday, September 15, 2022 3:41 PM  
**To:** KBM Client Complaints <[kbm\\_client\\_complaints@keybank.com](mailto:kbm_client_complaints@keybank.com)>  
**Subject:** [REDACTED]

Hi Team,

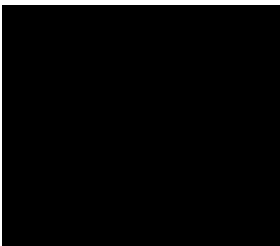
How would you like me to handle this? I just called the client to answer her questions, but it went straight to VM and I left her a vm msg.

I am not understanding what she is insinuating with her comments below. Please let me know what you would like me to do.

Thank you.

Sincerely,

[REDACTED]



KeyBank 

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**From:** [REDACTED]  
**Sent:** Thursday, September 15, 2022 3:35 PM  
**To:** [REDACTED]  
**Subject:** Re: Documentation

Hi

Sorry I am perplexed. What other options did your loan officer discuss and what it's the avoidance with Key Bank not disclosing the full disclosure of a program that is offered through the bank that you

work for. It would be nice to take accountability for the lack of transparency your institution has displayed and is continuing to display.

Thank You

On Thursday, September 15, 2022, 03:13:05 PM EDT, [REDACTED] wrote:

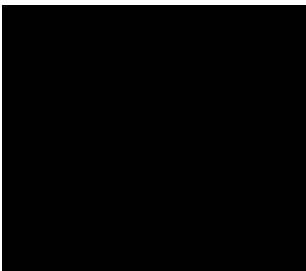
[REDACTED]

Here is the program information that my Loan Office was working on qualifying you for. From my understanding we did discuss other programs and could revisit them if you would like.

Please let me know if you have any other questions.

Sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



---

**From:** [REDACTED]  
**Sent:** Thursday, September 15, 2022 3:00 PM  
**To:** [REDACTED]  
**Subject:** Re: Documentation

Hello

Will you be able to send me over the documents I have requested.

Thanks

[REDACTED]

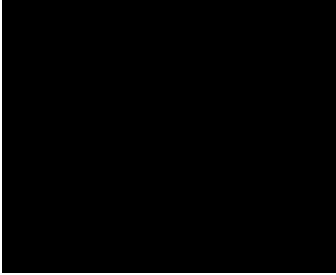
Good evening [REDACTED],

Thank you for bringing this to my attention. What Loan Officer are you working with and do you know what program was discussed?

Sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]



---

**From:** [REDACTED]  
**Sent:** Wednesday, September 14, 2022 8:18 PM  
**To:** [REDACTED]  
**Subject:** Documentation

**WARNING:** This email originated externally. Exercise caution. Think before clicking links or opening attachments.

Good Evening

I have requested documentation from your Home lending officer that she is refusing to allow a loyal customer of Key Bank view. Now as a Fortune 500 Company I find it odd as well as illegal not to provide consumers with requested documentation regarding. program that is offered to 1000 of customers. At this time your practices are being displayed as predatory and discriminatory which is not a good outlook for your institution. Once again I would like to receive a full disclosure of the qualifications of your 100% financing option. Thank you for your assistance with this matter.

Respectfully

KeyCorp Public



This communication may contain privileged and/or confidential information. It is intended solely for the use of the addressee. If you are not the intended recipient, you are strictly prohibited from disclosing, copying, distributing or using any of this information. If you received this communication in error, please contact the sender immediately and destroy the material in its entirety, whether electronic or hard copy. This communication may contain nonpublic personal information about consumers subject to the restrictions of the Gramm-Leach-Bliley Act. You may not directly or indirectly reuse or redisclose such information for any purpose other than to provide the services for which you are receiving the information.

127 Public Square, Cleveland, OH 44114

If you prefer not to receive future e-mail offers for products or services from Key, send an email to <mailto:DNERequests@key.com> with 'No Promotional E-mails' in the SUBJECT line.



**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

December 16, 2022

[REDACTED]  
[REDACTED]

RE: Mortgage Purchase Applications [REDACTED]  
[REDACTED]

Dear [REDACTED]

This letter is in response to your concern regarding the Applications. We regret the frustrating experience you've had and would like to share the results of our investigation.

On August 1, 2022, you submitted an Application for a [REDACTED]. Due to the property's location, the Application was eligible and qualified for our Key Community Mortgage Program (please see the enclosed flyer for the program). This Application was withdrawn on August 9, 2022.

On September 13, 2022, you submitted an Application for a property located at [REDACTED]. Shortly after the Application was submitted, we discovered that this property did not qualify for the Key Community Mortgage Program. To assist you with finding a property that would meet the requirements for the Key Community Mortgage Program, the loan officer assisting you emailed you a link with properties that would meet the requirements. Per your request, this Application was withdrawn.

While the loan officer did his best to explain the Key Community Mortgage Program to you, we feel that the loan officer could have explained the requirements of the program in more detail to you. We apologize for the frustration and inconvenience this caused you and please be assured that we have handled this internally with the appropriate personnel.

At KeyBank, we're committed to diversity, equity, and inclusion in all we do. Please be advised that we take discrimination claims seriously, and I want to assure you that KeyBank complies with all Federal and State anti-discrimination laws in addition to our own internal policies regarding discrimination. KeyBank does not discriminate against individuals based on age, race, color, religion, national origin, sex, sexual orientation, veteran status, disability, marital status, familial status (e.g. family size or childbearing intentions), receipt of public assistance income or any exercise of rights under the Consumer Credit Protection Act.

Thank you for allowing us to serve your banking needs and contribute to your financial wellness. If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TDD/TTY device, please call 1-800-539-8336. We are available Monday through Friday from 8am to 7pm Eastern time.

Notice: The federal Equal Credit Opportunity Act prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age (provided the applicant has the capacity to enter into a binding contract); because all or part of the applicant's income derives from any public assistance program; or because the applicant has in good faith exercised any right under the Consumer Credit Protection Act. The federal agency that administers compliance with this law concerning this creditor is the Bureau of Consumer Financial Protection, 1700 G Street NW, Washington, DC 20006.

Sincerely,

[Redacted signature]

Enclosures  
Key Community Program Flyer

Notice: The federal Equal Credit Opportunity Act prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age (provided the applicant has the capacity to enter into a binding contract); because all or part of the applicant's income derives from any public assistance program; or because the applicant has in good faith exercised any right under the Consumer Credit Protection Act. The federal agency that administers compliance with this law concerning this creditor is the Bureau of Consumer Financial Protection, 1700 G Street NW, Washington, DC 20006.

KBO - Feedback - goes to next state in 34 hours - Assigned to [CLF] ECR Team IN PROGRESS

2/10 September 8, 2022, 8:16 PM EST

[0 subscribers](#)

Respond
Reassign Alert
Close
Add
Subscribe

Profile

Customer Information

App ID (Mobile)

City

Digital Survey

Origin Type

Region

Client Name

Metadata Information

Response Date (ET)

Survey ID

UPI

Unit

Activity

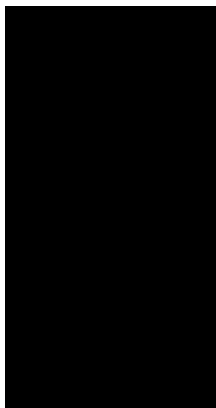
- Note  
09/09/2022, 5:07:14 PM EST - [Redacted] [CLF] Customer Advocacy Team  
ocr
- Alert  
09/09/2022, 5:07:01 PM EST - [Redacted] [CLF] Customer Advocacy Team  
Assigned to [CLF] ECR Team by [Redacted]  
Message:  
closed branch
- Alert  
09/08/2022, 8:38:42 PM EST - System Generated  
Automatically assigned to [CLF] Customer Advocacy Team
- Alert status  
09/08/2022, 8:38:42 PM EST - System Generated
- Alert Created: KBO  
09/08/2022, 8:38:39 PM EST - System Generated  
KBO - Feedback

[View](#)

Score Report



Custom



## V e r b a t



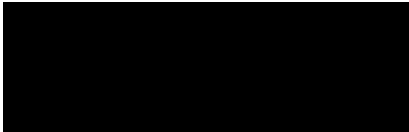
## Reason for Score Comment

I live near Kresgeville pa. For 25 years I banked at a local bank located here on route 209 It changed names many times but I stayed with that local building It became KeyBank and I stayed AT THAT LOCATION. A few months ago it closed So now we lost that local office. It was usually busy not empty I So now we go Into Palmerton office. That's ok not too far 15 minutes away. They recently seemed to have a PUSH to take out a loan including calls to my son who has a small business so he wound up taking a loan out which ties us even more to the bank and to stay with the bank. Well now PALMERTON office closes soon. Seriously, I'll be leaving as soon as I can figure out where else to go this is the last straw. Unfortunately my sons business loan ties him to this bank For now. That was sneaky all the years this bank buildings held different names for almost 40 years I went to them (25 years Kresgeville Palmerton office before that ) Now we have lost BOTH buildings because of KeyBank. I'm sure this doesn't mean anything to you and I'm sure no one cares but you always send me information wanting reviews so now you have mine. I can see closing one in an area but two in the same area is hurting a lot of people and I know I'm not alone. I can't wait to get out of this bank One last thing Lehighton is terrible I refuse to go there again done waiting one day 15 minutes to get waited on its small office and terrible road and area to get in and out of



**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

March 17, 2023



RE: Key Case No. 10551108

Dear [REDACTED]

This letter is in response to your issue regarding recent branch interactions and the [REDACTED] branch consolidation. We regret the frustrating experience you've had and would like to share the results of our investigation.

First and foremost, we would like to thank you for being a longtime KeyBank client and appreciate your feedback regarding wait times at the [REDACTED] branch. We will continue to do our best to minimize wait times and address your banking needs promptly when you visit. Regarding your concern about the construction around this location; we are not affiliated with this construction project and unfortunately have no knowledge of when it will be completed. Furthermore, we have also investigated your claims of sales pressure and were unable to find any evidence of wrongdoing.

KeyBank is committed to a strong branch network in the communities we serve tailored to client convenience and preference. We know that while mobile and online options offer tremendous speed and convenience, many clients still want to sit down, face-to-face with our branch professionals to discuss more complex banking needs.

Like any other business, KeyBank continually reviews the structure of its organization to maintain a strong position in the marketplace and remain profitable while continuing to serve the financial needs of our clients. The decision to close or consolidate a branch may be based on decreased client foot traffic due to increased online/mobile banking usage and/or proximity to another KeyBank branch.

Lastly, please be assured that KeyBank takes its Community Reinvestment Act (CRA) responsibilities seriously. KeyBank is proud of its Outstanding ratings, which reflect our ongoing commitment to serving our communities and neighbors. For more information on how KeyBank invests in its communities and helps clients and communities thrive, please visit: <https://www.key.com/about/corporate-responsibility/corporate-responsibility-reporting.jsp>

KeyBank is committed to making this transition as smooth as possible for our clients. Clients can expect to continue to receive the same high level of service from KeyBank at other nearby branches and will continue to have access to KeyBank's ATM network, telephone banking at 1-800-KEY2YOU, online banking via the internet at key.com, and mobile banking. For clients using a TDD/TTY device, please call 1-800-539-8336. Our clients have many options to connect with KeyBank when, where, and how they prefer.

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Thank you for allowing us to serve your banking needs and contribute to your financial wellness.

Sincerely,



Enterprise Client Relations  
Office of the President

High-Risk: ECR - goes to next state in 37 hours - Assigned to [CLF] ECR Team NEW

10/10

December 19, 2022, 7:40 PM EST

[Subscribers](#)

[Respond](#) [Reassign Alert](#) [Close Alert](#) [Add Note](#) [Subscribe](#)

### Profile

#### Customer Information

Client ID [Redacted]

Email [Redacted]

CC Client Type [Redacted]

Age [Redacted]

Agent ID [Redacted]

Number of Holds [Redacted]

Number of Transfer [Redacted]

Tenure [Redacted]

Wait Time [Redacted]

#### Metadata Information

Response Date (ET) [Redacted]

Survey ID [Redacted]

IPI [Redacted]

CC Interaction Type [Redacted]

Unit [Redacted]

Client IPI [Redacted]

Survey Program [Redacted]

Unique Id [Redacted]

### Activity

- Alert Assigned**  
12/19/2022, 8:32:06 PM EST · System Generated  
Automatically assigned to [CLF] ECR Team
- Alert Assigned**  
12/19/2022, 8:32:06 PM EST · System Generated  
Automatically assigned to [CLF] ECR Team
- Alert status set to New**  
12/19/2022, 8:32:06 PM EST · System Generated
- Alert status set to New**  
12/19/2022, 8:32:06 PM EST · System Generated
- Alert Created: High-Risk: ECR**  
12/19/2022, 8:32:01 PM EST · System Generated  
High-Risk: ECR

[View Less](#)

### Score Report

#### Net Promoter Scores

Contact Center NPS 10

#### Contact Center Drivers



#### Others

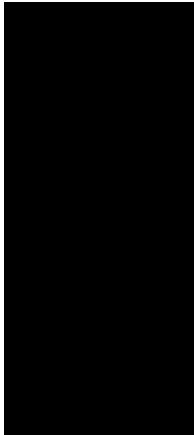
Problem Experienced

Reason for call



Segments

Segments



Verbatims



Reason for Likelihood to Recommend Comment

I went into my local bank and they helped me out with my bank fraud by giving me a number to call. When I called the number I was expecting an automated call but I spoke to a very polite and care man who guided me through everything and found a solution to the problem I addressed. I'm very pleased with how everything turned out! Thank you all!!

How could KeyBank be better for you?

They closed the key bank which was in my town so opening more branches for better access would be helpful for many people like me.

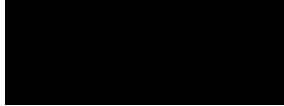
Describe Question

I had bank fraud.



**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

February 8, 2023



Re:

Key Case No. 2DT6L4

Dear 

Thank you for contacting us regarding your recent concern related to the Gray branch closure or consolidation. The Gray branch consolidated with the Windham branch on May 21, 2021.

KeyBank is committed to a strong branch network in the communities we serve tailored to client convenience and preference. We know that while mobile and online options offer tremendous speed and convenience, many clients still want to sit down, face-to-face with our branch professionals to discuss more complex banking needs.

Like any other business, KeyBank continually reviews the structure of its organization to maintain a strong position in the marketplace and remain profitable while continuing to serve the financial needs of our clients. The decision to close or consolidate a branch may be based on decreased client foot traffic due to increased online/mobile banking usage and/or proximity to another KeyBank branch.

KeyBank is committed to making this transition as smooth as possible for our clients. Clients can expect to continue to receive the same high level of service from KeyBank at other nearby branches and will continue to have access to KeyBank's ATM network, telephone banking at 1-800-KEY2YOU, online banking via the internet at key.com, and mobile banking.

Lastly, please be assured that KeyBank takes its Community Reinvestment Act (CRA) responsibilities seriously. KeyBank is proud of its Outstanding ratings, which reflect our ongoing commitment to serving our communities and neighbors. For more information on how KeyBank invests in its communities and helps clients and communities thrive, please visit: <https://www.key.com/about/corporate-responsibility/corporate-responsibility-reporting.jsp>

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TDD/TTY device, please call 1-800-539-8336. We are available Monday through Friday from 8am to 7pm Eastern time.

Sincerely,



Enterprise Client Relations  
Office of the President

## Executive Client Relations

---

**From:** [REDACTED]  
**Sent:** [REDACTED] :30 PM  
**To:** [REDACTED]  
**Subject:** Re: Insurance

Greetings [REDACTED]

Let me start this email by stating that I don't intend for this to be directed personally toward you. You have been responsive and nice to work with.

To say that I'm disappointed by this message is an understatement. From the beginning of our conversations, KeyBank has continually moved the goalposts. I have had commitments going back six years both from CRS and KeyBank that explicitly stated that having two heritage home loans on these separate houses wouldn't be an issue. As recently as this year we had a Heritage Loan on the rear house that my in-laws live in and a HELP loan on the back house, and a HELP loan on the front home. THREE LOANS FROM KEYBANK! This is in addition to the primary mortgage from Third Federal. We paid off the original HELP loan leaving one Heritage on the back house and one HELP loan on the front house. Speaking with folks at CRS, they didn't see an issue in consolidating a new Heritage into the existing loans. Then we were told that wasn't possible, but if we paid off the second HELP loan we could have one Heritage on the back house and one Heritage on the front house. Now we are being told that a new policy was created sometime recently that doesn't even allow this!? You even told me that a second Heritage Loan would have an interest rate of 2% instead of 1.4%. How is that possible if you won't be in the third position? You've pulled our credit scores and talked with our employers. All of this information was known at the time of application and we continue to provide all the information as requested even though the existing loans were shared from the onset.

Our two houses are both over 100 years old and are on a street that is zoned as two-family pro [REDACTED]. Our street exemplifies a pre-automobile neighborhood from the late 19th century. The former owner, [REDACTED], lived in the house with her family starting in the mid-'40s buying it with the G.I. Bill. She passed away in 2016 at 102. To say the houses need updating is putting it mildly. In fact, the back house wasn't habitable and we almost weren't able to close on the house because no one would insure it in its previous condition. We poured over \$100K into that house not to mention over a year of sweat equity to return it to a beautiful state for my aging in-laws to live in. These homes are in Ohio City. I can only imagine how KeyBank would treat someone trying to get a loan to rehab a house in Hough or Mount Pleasant. Cleveland continually has to demolish thousands of houses a year that have gone into severe disrepair. Yet here we are, trying our best to rehab historic homes by bringing them into the 21st century, and we are getting shifting responses, and ultimately a no!? Who makes these decisions? If we arbitrarily had a lot split with two separate parcel numbers, somehow this bureaucratic rule would dissipate? Are you telling me that no one at KeyBank has the creative capacity to look at the aerial imagery and make an informed decision here? It's not a cash flow issue, the back house has a monthly rental income of \$1375 and has since march of 2017 which we demonstrated with our tax returns. It's not an appraisal issue, this neighborhood has appreciated greatly since 2016, and I know it's not a credit issue--KeyBank sent us letters recently stating that our credit scores are 850. Plus, both of our incomes have increased significantly over the past 24 months. My question is what is KeyBank actually doing to help the residents in the city that you tower over? I work closely with the National Community Reinvestment Coalition for my day job and they seem to be asking the same questions.

Since 2016, NCRC has facilitated the creation of community benefits agreements with 21 bank groups worth a combined \$589 billion for mortgage, small business and community development lending, investments and philanthropy in less privileged communities. The very first of these agreements was with KeyBank. They recently announced that they are withdrawing from negotiations for a new community benefits agreement with KeyBank. They also published a report that found that from 2018-2021 KeyBank had the lowest percentage of mortgage originations to Black borrowers among the 50 largest mortgage lenders, and a dramatic drop in the

bank's overall lending to low- and moderate-income (LMI) borrowers.

Here's more on what they found:

Press release: [KeyBank Promised To Improve, Then Became The Worst Major Mortgage Lender For Black Homebuyers](#)

Report: [KeyBank Failed Black America Despite Its Commitments To Improve](#)

Since moving to Cleveland, I have been a KeyBank customer. When my parents recently moved here, I told them to be KeyBank customers. However, it is now clear to me that you don't care about us as customers or our neighborhood that we've spent the last six years continuously investing in. It seems the only reason you have a branch in our neighborhood is to check the CRA box. How in the world are we ever going to make the collective investment needed to revitalize Cleveland if the biggest bank in town can't figure out how to make two loans on two houses on one tax parcel? If this is a risk issue would having more money in a KeyBank savings account reduce that risk? What is the default rate of Heritage loans overall over the past five years from people with our lending profile? We keep getting various forms of no but would appreciate some creative problem-solving on this issue.

I strongly urge you and your colleagues to reconsider the decision you conveyed in yesterday's email. Feel free to call me if you would like to discuss this further.

[Redacted]

On Wed, Dec 21, 2022 at 1:01 PM [Redacted] wrote:

Hello [Redacted] There will be no need to send the 2021 returns. I just got a message from the underwriter letting me know that they will not be able to proceed with the loan as this would be a third lien position if it were to be written regardless of the fact that the loan was used on a different property. The fact is that since it is one parcel. The liens are considered to be on the same property so currently that would mean that we would be working on a 4<sup>th</sup> lien position and then 3<sup>rd</sup> if the HELP loan were to be paid off. Key Bank no longer does 3<sup>rd</sup> lien position loans since last year so they would no longer be able to continue with this loan. Please call me at your convenience if you would like to discuss further.

[Redacted]

**Begin your home p  
prequalification or  
application here.**



---

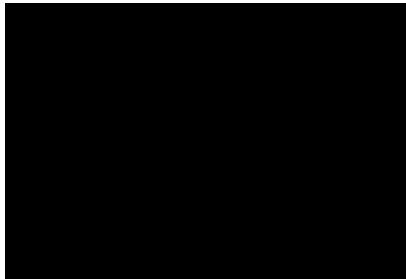
From [REDACTED]

[REDACTED]  
Subject: Re: Insurance

Ok, I will scan and send those over later today.

On Wed, Dec 21, 2022 at 9:17 AM [REDACTED]

Thank you. I will need 2021 as well please



Begin your home p  
prequalification or i  
application here.



---

From [REDACTED]

[REDACTED]  
Subject: Re: Insurance

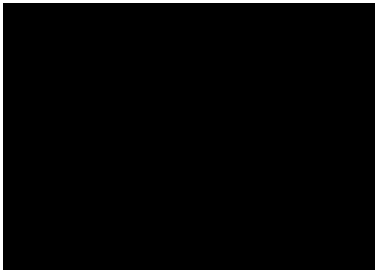


Nice chatting with you today. Attached, please find my tax return that shows the rental income from the back house-- \$1,375 monthly.

[REDACTED]

On Tue, Dec 20, 2022 at 9:55 AM [REDACTED] wrote:

So far so good. We are waiting on the appraisal to come in.



**Begin your home p  
prequalification or  
application here.**

**KeyBank**

---

**From** [REDACTED]

**Subject:** Re: Insurance

**WARNING:** This email originated externally. Exercise caution. Think before clicking links or opening attachments.

[REDACTED]

I wanted to follow up on our loan application and see how things are on your end. I think CRS has everything they need.

On Fri, Dec 16, 2022 at 9:03 AM [REDACTED] wrote:

[REDACTED]

I realize that I failed to mention that we have two separate policies for the two structures (2160 & 2162). Please see the additional declarations page attached. After speaking with our insurance agent they said this should be sufficient for the total encumbrance of debt. Let me know if you have any questions. I'm still unclear on what amount we would need to cover--\$119K (first mortgage) \$42K (first Heritage on back house) ~\$100K (second Heritage on front house). Since we are having to pay off the existing HELP (\$25K on the front house) our total debt after this new loan would be approx. \$260K which is clearly covered by our two existing policies. As you can see our dwelling coverage is \$155K for the back house and \$320K for the front house. We also just got a new umbrella policy as well. Thanks for your assistance.

[REDACTED]

On Mon, Dec 12, 2022 at 10:27 AM [REDACTED] wrote:

Hello [REDACTED] the underwriter sent me a message:

APPLICATION ON HOLD- THE CLIENT'S COVERAGE ON THEIR HOME OWNER'S INSURANCE POLICY IS INSUFFICIENT. THE CLIENT WILL NEED TO INCREASE THEIR DWELLING COVERAGE TO AT LEAST COVER BOTH LIENS IN ORDER TO PROCEED

Please let me know if this is possible and send me the updated coverage once you have it. Thank you

[REDACTED]



**Begin your home p  
prequalification or i  
application here.**

---

**KeyBank**

KeyCorp Public

This communication may contain privileged and/or confidential information. It is intended solely for the use of the addressee. If you are not the intended recipient, you are strictly prohibited from disclosing, copying, distributing or using any of this information. If you received this communication in error, please contact the sender immediately and destroy the material in its entirety, whether electronic or hard copy. This communication may contain nonpublic personal information about consumers subject to the restrictions of the Gramm-Leach-Bliley Act. You may not directly or indirectly reuse or redisclose such information for any purpose other than to provide the services for which you are receiving the information.

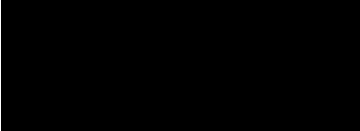
127 Public Square, Cleveland, OH 44114

If you prefer not to receive future e-mail offers for products or services from Key, send an email to <mailto:DNERequests@key.com> with 'No Promotional E-mails' in the SUBJECT line.

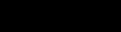


**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

February 17, 2023



RE: KeyBank Case No. 2DW4UC

Dear 

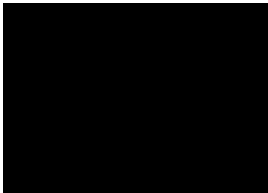
This letter is in response to your concern regarding your recent loan application. We regret the frustrating experience you've had and would like to share the results of our investigation.

KeyBank does not offer the loan terms you requested. As the terms requested are not offered by KeyBank, we were unable to complete the loan. We understand you have a property with two homes, but they are zoned as a two-family home and not as separate parcels. As there are already three liens on the property, we are unable to offer a fourth lien.

Lastly, please be assured that KeyBank takes its Community Reinvestment Act (CRA) and Fair Lending obligations seriously. KeyBank complies and is committed to compliance with the letter and spirit of laws, regulations, and regulatory guidance that relate to fair lending. KeyBank does not discriminate against individuals based on age, race, color, religion, national origin, sex, sexual orientation, veteran status, disability, marital status, familial status (e.g. family size or childbearing intentions), receipt of public assistance income or any exercise of rights under the Consumer Credit Protection Act. For more information on how KeyBank invests in its communities and helps clients and communities thrive, please visit: <https://www.key.com/about/corporate-responsibility/corporate-responsibility-reporting.jsp>

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TDD/TTY device, please call 1-800-539-8336. We are available Monday through Friday from 8am to 7pm Eastern time.

Sincerely,



Enterprise Client Relations  
Office of the President

November 21, 2022

Christopher Gorman  
Chairman, Chief Executive Officer, and President of KeyCorp  
[Christopher\\_Gorman@KeyBank.com](mailto:Christopher_Gorman@KeyBank.com)

Dear Mr. Gorman,

I am writing to inform you of my decision to stop updated community benefits plan negotiations and to resign from KeyBank's Corporate Responsibility National Advisory Council. This is a very difficult decision. However, my team and I feel it is necessary given KeyBank's failure to meet many of its goals in the 2017 Community Benefits Plan (the "2017 Plan").

KeyBank provided information confirming that it did not achieve several of its goals in the 2017 Plan, including: (i) the commitment to target 35% of community development activities in KeyBank markets that overlapped with First Niagara over a five-year period; (ii) commitments to increase mortgage lending in specific overlap markets such as Buffalo and Rochester; and (iii) commitments to product innovations, including developing a rural lending and investing strategy. In fact, from 2018 through 2021, KeyBank's HMDA data reveals that lending to borrowers with low and moderate incomes decreased as a share of KeyBank's total lending. Equally troubling is that only 2.2% of KeyBank's 2021 mortgage originations went to African American borrowers. These are unacceptable results following the 2017 plan. In addition, we were disappointed to learn that KeyBank entered into a settlement agreement with the New York Attorney General's office following findings that KeyBank deceptively advertised the KeyBank Plus check cashing service, actively breaking another commitment of the 2017 Plan. KeyBank's decision to delay more heavily weighing loan units in compensation for mortgage loan officers until 2020, four years into the five-year plan, is further evidence of its blatant disregard and failure to actively implement the 2017 Plan. It is possible that KeyBank would have had more success at achieving its mortgage growth goals by implementing this change earlier.

KeyBank poorly executed its announcement of a new plan in 2021 with little communication to the National Advisory Board. In response to that announcement, we collaborated with you to host seven community meetings with our members throughout your service area in 2021. Nearly 140 organizations provided feedback on KeyBank's next community benefits plan during this process. These organizations took time away from serving their communities to provide KeyBank with recommendations that would help KeyBank better serve its markets. Follow up discussions since those meetings have been ineffective. KeyBank refused to take action on the majority of NCRC's and NCRC members' suggestions, and demonstrated an unwillingness to establish goals and processes that would address widespread dissatisfaction with the implementation of the 2017 Plan.

Overall, KeyBank has not prioritized the implementation of the 2017 Plan which has resulted in a failure to achieve many of its goals outlined in the plan. KeyBank's lending performance is one of many indicators depicting this failure. KeyBank has a great deal of work to do to align with NCRC's goals of creating a just and inclusive economy.

We hope KeyBank improves its performance throughout the communities it has an obligation to serve, but we cannot continue to collaborate with KeyBank given the troubling issues described above.

[Redacted]

President and CEO  
NCRC

CC

[Redacted]

[Redacted]

[Redacted]



Chris Gorman, Chairman, Chief Executive Officer, and President of KeyCorp, met with the complainant to discuss their letter on December 7, 2022.

High-Risk: ECR - goes to next state in 54 hours - Assigned to [CLF] ECR Team NEW

2/10

May 1, 2022, 4:01 PM EST   
[0 viewers](#) [0 subscribers](#)

**Respond** **Reassign Alert** **Close Alert** **Add Note** **Subscribe**

### Profile

#### Customer Information

Client ID	[REDACTED]
Email	[REDACTED]
Age (Branch/ATM)	[REDACTED]
ATM / Branch ID	[REDACTED]
Branch/ATM Transaction Type	ATM
Client Type	[REDACTED]
Customer Type Export	[REDACTED]
Gender	[REDACTED]
Line of Business	Consumer
Tenure	2-5 Years
Transaction Date (ET)	04/29/2022, 05:23 PM
Transaction Description	[REDACTED]
Transaction ID	[REDACTED]
Transaction Product	Checking account type

#### Metadata Information

Response Date (ET)	05/01/2022, 04:01 PM
Survey ID	[REDACTED]
IPI	[REDACTED]
Transaction ID	[REDACTED]
Unit	[REDACTED]
Client IPI	[REDACTED]
Survey Program	ATM
Unique Id	[REDACTED]

### Activity

- Alert Assigned**  
05/01/2022, 4:16:38 PM EST - System Generated  
Automatically assigned to [CLF] ECR Team
- Alert status set to New**  
05/01/2022, 4:16:38 PM EST - System Generated
- Alert Created: High-Risk: ECR**  
05/01/2022, 4:16:35 PM EST - System Generated  
High-Risk: ECR

### Score Report

#### Net Promoter Scores



#### ATM Drivers



#### Others

Needs Not Addressed  Yes  No

Segments

Segments

Transaction Product

Transaction Description

Investable Asset Level

Verbatims



Reason for Likelihood to Recommend Comment

I've been a KeyBank customer for several years now, and have several family members that have been with KeyBank for a multitude of years. However, I am extremely dissatisfied with KeyBank's decision to close the ONLY local branch in our city! Our choices are much further away and the traffic to get to these branches and in/out of the branches are ridiculous even in a good day! I don't think that those who make these types of decisions think about such things as how long we now have to travel to get to a branch, and what we have to go through (as far as smaller parking areas, restricted access to ATM because of a smaller lot area, and the traffic that we have to go through to even get in/out of these other branches! It all looks really good on paper, but to those of us who now have to travel further and go through the aggravation of traffic issues, which is why, for me (and others I know), I avoid these other locations as much as possible for such things as shopping, etc. This becomes even more important in the winter when driving comes to a stop due to weather! Your executive management teams aren't always very bright in these types of decisions because they don't think about the human side of your customer - maybe they should start! I, for one, will most likely choose a bank that has a branch located within our small city because they aren't forcing me to drive for miles and through abominable traffic to be their customer!

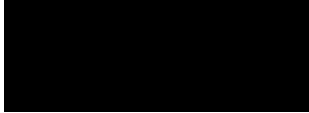
How could KeyBank be better for you?

KeyBank could serve me better by NOT closing the only branch in our city, forcing me to have to drive mor miles to use their branches located in other cities that are extremely difficult to get through due to ridiculously high traffic patterns, and smaller lots that make it difficult to maneuver through when they are now supposed to accommodate an increase of customers. I'm not happy about this, it wasn't thought through with your local customers convenience or safety in mind, and I most likely will choose a local bank that wants to keep a local branch to serve its Painesville and Painesville Township customer base!




**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

May 26, 2022



Re: Key Case No. 10374772

Dear 

Thank you for contacting us regarding your recent concern related to the  branch closure.

KeyBank is committed to a strong branch network in the communities we serve tailored to client convenience and preference. We know that while mobile and online options offer tremendous speed and convenience, many clients still want to sit down, face-to-face with our branch professionals to discuss more complex banking needs.

Like any other business, KeyBank continually reviews the structure of its organization to maintain a strong position in the marketplace and remain profitable while continuing to serve the financial needs of our clients. The decision to close or consolidate a branch may be based on decreased client foot traffic due to increased online/mobile banking usage and/or proximity to another KeyBank branch.

KeyBank is committed to making this transition as smooth as possible for our clients. Clients can expect to continue to receive the same high level of service from KeyBank at other nearby branches and will continue to have access to KeyBank's ATM network, telephone banking at 1-800-KEY2YOU, online banking via the internet at key.com, and mobile banking. For clients using a TDD/TTY device, please call 1-800-539-8336. Our clients have many options to connect with KeyBank when, where, and how they prefer.

Lastly, please be assured that KeyBank takes its Community Reinvestment Act (CRA) responsibilities seriously. KeyBank is proud of its Outstanding ratings, which reflect our ongoing commitment to serving our communities and neighbors. For more information on how KeyBank invests in its communities and helps clients and communities thrive, please visit: <https://www.key.com/about/corporate-responsibility/corporate-responsibility-reporting.jsp>

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. We are available Monday through Friday from 8am to 7pm Eastern time.

Sincerely,



Enterprise Client Relations  
Office of the President





High-Risk: ECR - goes to next state in 58 hours - Assigned to [CLF] ECR Team NEW

0/10 H O Y T . . . July 29, 2022, 8:06 PM EST

[0 viewers](#) [0 subscribers](#)

Respond 
Reassign Alert
Close
Add
Subscribe

Profile

Customer Information

Client ID	[Redacted]
Email	[Redacted]
Age (Branch/ATM)	[Redacted]
ATM / Branch ID	[Redacted]
Branch/ATM Transaction Type	ATM
Client Type	[Redacted]
Customer Type Export	[Redacted]
Gender	[Redacted]
Line of Business	Consumer
Tenure	20 Years +
Transaction Date (ET)	07/22/2022, 01:30 PM
Transaction Description	[Redacted]
Transaction ID	[Redacted]
Transaction Product	[Redacted]

Metadata Information

Response Date (ET)	07/29/2022, 08:06 PM
Survey ID	[Redacted]
IPI	[Redacted]
Transaction ID	[Redacted]
Unit	[Redacted]
Client IPI	[Redacted]
Survey Program	ATM
Unique Id	[Redacted]

Activity

- Alert**  
07/29/2022, 8:07:48 PM EST - System Generated  
Automatically assigned to [CLF] ECR Team
- Alert status**  
07/29/2022, 8:07:48 PM EST - System Generated
- Alert Created:**  
07/29/2022, 8:07:44 PM EST - System Generated  
High-Risk: ECR

Score

Net Promoter Scores

ATMNPS 0

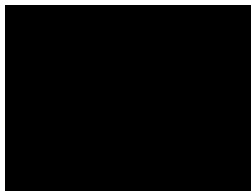
ATM Drivers

ATM Range of Services 0

Needs Not Addressed

Yes  No

Segments



Verbatims



Reason for Likelihood to Recommend Comment

During the Pandemic you closed both Statington branches, forcing everyone in our community to drive 25 -30 minutes to a branch that was nearest us. Now 12/3 your permanently closing the two branches in our area forcing us to drive the extra distance again. So much for customer service.

How could KeyBank be better for you?

Keep the local branches open



**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

August 3, 2022



Re: Case No. 10497685

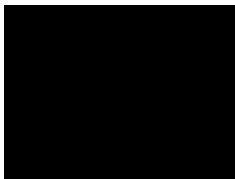
Dear 

Thank you for contacting us regarding your recent concern. KeyBank is committed to providing ease, value, and expertise to our clients and addressing any concerns timely.

I would like to discuss your concern however; I have been unable to reach you by phone. I kindly ask that you contact me, citing the case number above, at 1-800-625-3256 at your earliest convenience. For clients using a TDD/TTY device, please call 1-800-539-8336. We are available Monday through Friday from 8am to 7pm Eastern time.

Thank you for allowing us to serve your banking needs and contribute to your financial wellness.

Sincerely,



Enterprise Client Relations  
Office of the President

High-Risk: ECR - goes to next state in 16 hours - Assigned to [CLF] ECR Team NEW



September 4, 2022, 10:36 PM EST [0 subscribers](#)

[Respond](#) [Reassign Alert](#) [Close](#) [Add](#) [Subscribe](#)

Pr o f

Customer Information

App ID (Mobile)	
Browser Language	
City	
Device	
Digital Survey	
Origin Type	
Region	
Client Name	

Metadata Information

Response Date (ET)	
Survey ID	
IP	
Unit	

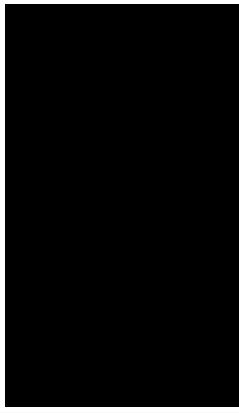
A c t i v

- Alert**  
09/04/2022, 10:53:27 PM EST · System Generated  
Automatically assigned to [CLF] ECR Team
- Alert status**  
09/04/2022, 10:53:27 PM EST · System Generated
- Alert Created:**  
09/04/2022, 10:53:24 PM EST · System Generated  
High-Risk: ECR

S c o r e  
R e p o r t



C u s t o m



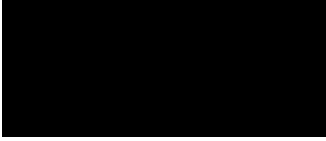
V e r b a t

**Reason for Score Comment**  
I recently learned that Key will be closing our local branch referring our business accounts to a branch 25 minutes away. The closing of the Palmerton branch will leave a single bank to serve a town of over 5500 and surrounding community of over 10000 people. While I dont claim to know the banking business, I cant help but think that there certainly is a demand for more than a single bank in a population center of over 15000 people. The alternate Key location that we have been referred to in Lehighton, Pa is simply too far away for the financial services our business requires. As a result and if the Palmerton branch truly is closed, our business will be forced to transfer our accounts to a different bank that can better provide the financial services we depend upon to operate a successful business. This will end an over 24 year relationship with the Palmerton location. Additionally, my family will also close our personal accounts with Key to better serve our personal needs in our community. I am truly saddened by this news and hope that perhaps this decision may be reconsidered. Thank you.




**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

September 15, 2022



Re: Key Case No. 10543359

Dear 

Thank you for contacting us regarding your recent concern related to the  branch closure or consolidation.

KeyBank is committed to a strong branch network in the communities we serve tailored to client convenience and preference. We know that while mobile and online options offer tremendous speed and convenience, many clients still want to sit down, face-to-face with our branch professionals to discuss more complex banking needs.

Like any other business, KeyBank continually reviews the structure of its organization to maintain a strong position in the marketplace and remain profitable while continuing to serve the financial needs of our clients. The decision to close or consolidate a branch may be based on decreased client foot traffic due to increased online/mobile banking usage and/or proximity to another KeyBank branch.

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Sincerely,



Enterprise Client Relations  
Office of the President

