

CONSERVANCY

FOR CUYAHOGA VALLEY NATIONAL PARK

March 1, 2023

██████████ OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear ██████████

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

The Conservancy for Cuyahoga Valley National Park works to connect the community with the national park in their backyard. The Conservancy offers overnight and field trip programs to students in Northeastern Ohio, especially to children in the Cleveland Municipal School District and the Akron Public Schools. We also oversee the park's cultural arts program and engage local artists to provide programs in the park that are culturally relevant.

KeyBank has been an engaged partner and has supported the Conservancy to make this national park accessible and appealing to urban youth, families, and adults. KeyBank has supported our education programs, our arts programs, and our work in creating and maintaining accessible trails. This support demonstrates KeyBank's commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by financially supporting our outreach efforts, sponsoring concerts and other cultural arts activities and by providing volunteers to assist us in a variety of projects in the park, from tree planting to family oriented activities in the park.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. In our case, their work is assisting us in assuring that lower-income communities and children have access to a national park. KeyBank has helped us take the park to the people as well, by supporting us in sending staff teams to Cleveland neighborhoods to enjoy special outdoor programming. The health and wellness benefits of parks are well documented and we appreciate KeyBank's willingness to help assure that area residents can easily enjoy this important asset.

If you have questions, please contact me at 440-403-4251 or email me at dyandala@forcvnp.org

Sincerely,



Deb Yandala, President and CEO

3/2/23

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Kent State University Foundation, Inc. works to achieve the university's needs and priorities, provides leadership to raise private sector funds and exercises stewardship of assets.

KeyBank has been an engaged partner and has supported Kent State University Foundation, Inc. to assist low-income and underrepresented students complete a degree, reduce the overall cost to the student and increase the impact of their degree. KeyBank's support of Key Connections program provided resources to remove financial, academic, and belonging barriers to graduation – and future success. Their support demonstrates KeyBank's commitment to serving low- and moderate-income neighborhoods through philanthropy and investments in college attainment for low-income students.

Between 2019 and 2021, KeyBank has worked with us to meet the needs of our NE Ohio community by supporting the Key Connections with an investment in this student success initiative program with a grant of \$1,000,000. As a result of their significant investment, both the persistence and graduation rates of the low-income and underrepresented students benefiting from the program have increased.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership has helped us to provide direct funding to support students with tuition, course supplies and providing professional development including internships, research and more. This initiative also supports the Summer Advantage Bootcamp program, a week-long residential experience designed to give incoming students an early college experience that includes introduction to campus resources, staff, and services to prepare them for future careers through a support network of peers and professional staff.

Kent State University Foundation looks forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.



Valoree Vargo

Vice President, Philanthropy and Alumni Engagement and CEO, Kent State University Foundation, Inc.

Kent State University Foundation, Inc.

March 7, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

ArtsinStark works to build community, we develop and advocate for a strong, inclusive, and collaborative network of arts and culture nonprofits and artists. We inspire people by partnering with community organizations, schools and educators to provide accessible arts and culture opportunities for all ages. We enable Stark County to thrive in a world economy, by funding innovative programs and services that engage audiences more broadly and deeply.

KeyBank has been an engaged partner and has supported ArtsinStark to uses the arts to create smarter kids, new jobs, and healthier communities. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by supporting The NE Ohio Genius Project this program has challenged the minds of students from Stark, Summit, Portage, Tuscarawas, Columbiana and Mahoning County. This 9-week project seeks to ignite the genius that resides in all young people by utilizing multiple academic standards including but not limited to math, science, art and financial literacy. Genius Team members will grow in problem solving skills, creative thinking, and project management as they work collectively to complete the challenge.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to bring arts education to life in public schools around the county.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at 330.409.7595 or email me at dlee@artsinstark.com

David Lee
Director of resource development



United Way
of Greater Stark County
Serving Stark and Carroll Counties

March 8, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

United Way of Greater Stark County serves all of Stark County and parts of Carroll County with a focus on alleviating the impacts of poverty on children and families, and the barriers they face as a result of poverty. United Way is dedicated to helping and supporting families and children in need. We recognize that child poverty is an issue that cannot be ignored in our community, and community resources must be aligned to address this urgent crisis. One out of every five children in Stark County live in households below the poverty level. It is imperative to take a two-generation approach in order to reduce childhood poverty rates and we do this by ensuring basic needs are met for families, providing early learning and school supports and empowering families to achieve financial stability to move out of poverty. The price of poverty affects all of us as a community and this is something that KeyBank has recognized and proven their commitment to address.

KeyBank has been an engaged partner and has supported United Way of Greater Stark County to improve the quality of lives in our communities by leading in the development of solutions to critical social issues in the areas of health, education, and financial stability. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by engaging employees through a workplace campaign, offering a corporate matching program, providing direct program support to CARE Team – a school based program that removes non-academic barriers affecting a student's learning and event sponsorship. United Way of Greater Stark County has also been fortunate to benefit from KeyBank leadership with an employee serving on our Board of Directors. In the past, KeyBank employees have served as Annual Campaign Chair, Campaign Cabinet members and in other volunteer leadership roles.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to maintain and grow services to meet our community's most urgent needs. KeyBank has been instrumental in the past year in helping United Way of Greater Stark County launch new programming directly focused on serving the needs of elementary students and their families at a local school with 100% of its student base defined as living in poverty.



United Way
of Greater Stark County
Serving Stark and Carroll Counties

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at **(330) 491-9974** or email me at carrie.clemens@uwstark.org.

Carrie A. Clemens

Carrie Clemens
Vice President, Resource Development
United Way of Greater Stark County



**Center for
Employment
Opportunities**

██████████ OCC Examiner-in-Charge

1 March 2023

National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear ██████████

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

The Center for Employment Opportunities (CEO) provides comprehensive employment services for the Nation's returning citizen population. Over the past 25 years CEO has grown from a pilot project in New York City to the largest reentry employment provider in the country, serving over 8,000 participants per year. CEO operates in 12 states and 31 jurisdictions, including the Midwest and Upstate New York, and these two regions are where KeyBank's philanthropic support has been impactful. Specifically KeyBank has supported our Cincinnati, Columbus, and Albany sites in 2021 through donations to those operations.

KeyBank has shown an active interest in our work and we appreciate KeyBank being an engaged partner supporting CEO's vision that anyone with a criminal record who wants to work has the preparation and support needed to find a job and stay connected to the labor force. By partnering with us, KeyBank has demonstrated that they believe that everyone, regardless of their past, deserves the chance to shape a stronger future for themselves, their family, and their communities. KeyBank's support demonstrates their commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism. Key Bank's partnership and engagement with CEO has allowed us to be responsive to the needs of the justice-impacted communities in Ohio and New York.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community. If you have questions, please contact me at jjcenteno@ceoworks.org.

Jessica Centeno
Deputy Executive Director
Midwest and Upstate New York

March 3, 2023

██████████ OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear ██████████

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

The Cincinnati Youth Collaborative (CYC) is on a mission to empower children and young adults to overcome obstacles and succeed in education, career, and life. At CYC, we work tirelessly to offer mentoring, college and career readiness, and additional supportive services for post-secondary success to young people annually. A constant area of need for the young people we serve is expanding their knowledge and understanding of the financial services industry as well as establishing and improving financial literacy. This often serves as a significant barrier for our students on their pathway to graduation and post-secondary pursuits.

KeyBank has been an engaged partner and has supported Cincinnati Youth Collaborative to provide educational and supportive services to our students for many years. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism. Almost the entirety of the over 4,000 young people CYC serves meet the requirements to be considered low to moderate income.

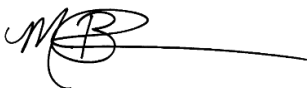
From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by providing for an emergency fund for our students that covers last minute or unplanned needs they may have; needs that become significant barriers to academic or career success. These needs include unexpected text book expenses, unplanned educational fees or even transportation to school/work. Because of this fund, we were recently able to help a student purchase a text book she was unable to afford personally. She had been told that without the book she would have to drop from her course at the University of Cincinnati, which would have then derailed her graduation timeline. Additionally, KeyBank has been a sponsor of our events which provides much needed funding for our human capital (a vital component to any organization providing human services).

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to remain agile on our journey to support our regions young people on their pathway to success.

We look forward to continuing and expanding our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at mrusincovitch@cycyouth.org or 513.604.7743.

Most Sincerely,



Marie Rusincovitch
Chief Development Officer
Cincinnati Youth Collaborative



Episcopal Retirement Services



March 7, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Re: KeyBank’s CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank’s Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021. Episcopal Retirement Services (ERS) works to provide quality housing throughout the full economic continuum. Our ERS Affordable Living strives to create communities that allow elders to thrive in safe housing. Our “secret” sauce is providing the health and life enrichment services that transform housing to communities. We call our communities Affording Living, not Affordable Housing. We believe that through Affordable Living communities we can transform our residents’ lives. After all, don’t our senior deserve to live on their terms after they have given so much to all of us?

KeyBank has been an engaged partner and has supported ERS to **enrich the lives of older adults in an innovative, person-centered, and spiritual-based way**. This support demonstrates its commitment to serving low and moderate income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by **providing much needed philanthropic support, providing loans, and assisting with financing**. KeyBank’s commitment and actions to serve the needs of low and moderate income communities are clear. KeyBank’s partnership and engagement have allowed us to be responsive to community needs and have helped us to **deliver our mission and help elders thrive**. **Without the support of KeyBank, we would provide housing, not living.**

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at 513.979.2222 or email me at llamb@erslife.org.

Sincerely,

Laura R. P. Lamb
President & CEO



February 22, 2023

██████████ OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear ██████████

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Founded in 1830 as Cincinnati Union Bethel, we are the longest continuously operating social service agency in Cincinnati, Ohio. Over the years, we have served hundreds of thousands of women, men, and children with meals, health care, education, housing, and other critical services. We changed our name to HER Cincinnati in 2021 to better reflect what we do (**H**ousing, **E**ducation, **R**ecovery) and who we serve (women). Support from Key Bank has helped build the capacity of our small staff of 21 FTEs to support approximately 300 people each year.

As a partner in our work, KeyBank helps us to fulfill our mission to empower women to break the cycles of poverty, addiction, and human trafficking. As 100% of our clients are economically challenged, support from Key Bank demonstrates their commitment to serving low income families.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community through their significant philanthropic support. Their investment in HER Cincinnati has allowed us to break the cycle of poverty two generations at a time at our Cincinnati Scholar House by helping both parents and children access the resources necessary for academic success and economic self-sufficiency.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at 513.768.6900 or email me at bschwartz@hercincinnati.org.

Sincerely,

A handwritten signature in black ink that reads "Beth Schwartz". The signature is written in a cursive, flowing style.

Beth Schwartz, CEO



Greater Cincinnati

March 3, 2023

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████████████████████
OCC Examiner-in-Charge
Office of the Comptroller
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Dear ████████████████████

I am writing on behalf of YWCA of Greater Cincinnati and am delighted to provide a recommendation for KeyBank’s Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

YWCA’s Mission is dedicated to eliminating racism, empowering women, and promoting peace, justice, freedom and dignity for all. Through education, advocacy, and programming, YWCA advances racial justice and empowers women of all races, ages, status, experience, and beliefs to take control over their lives, to be abuse-free, and to positively influence their community.

KeyBank has been an especially loyal and ongoing partner to YWCA in promoting our mission. Since 1994 to present, KeyBank has supported the YWCA with a lifetime giving total of over \$160,000. The three primary areas KeyBank has supported include our Domestic Violence Shelter Program (DVSP), our annual Career Women of Achievement Luncheon and our Racial Justice Breakfast.

YWCA's Domestic Violence Shelter Program (DVSP) provides survivors with the ONLY option for specialized domestic violence shelter in Southwest Ohio (Hamilton, Adams, Brown, and Clermont counties). Shelter services are operated 24/7, 365 days a year, reaching capacity nearly every night.

All services are trauma-informed and empower survivors to overcome the effects of abuse, gain financial stability, obtain stable housing, and reach self-sufficiency. Services include access to shelter, food, clothing, and personal care items; financial assistance; case management; mental health therapy,

referrals for legal, medical, psychological and substance abuse needs; work readiness training/adult literacy/financial education; support groups; court advocacy; children's services; affordable housing support; aftercare counseling; and pet protection.

In both 2022 and 2021, KeyBank provided \$25,000 in support to our DVS Program through its Affordable Housing initiative (\$50,000 total in support for both years).

Career Women of Achievement Luncheon

Established in 1980, YWCA Cincinnati's Career Women of Achievement (CWA) event honors eight community women who exemplify leadership and the important role of women in the workplace. The event increases community awareness and appreciation of the diverse contributions of women while also raising money for YWCA's domestic violence services. The luncheon has evolved into the YWCA's largest fundraising event, sponsored by 150 companies and organizations each year, with an attendance of over 2,100. In 2020, 2021, and 2022, we shifted the event to a TV/streaming broadcast with tens of thousands tuning in. We are thrilled that CWA will be back in person this year on May 10, 2023, at Duke Energy Convention Center.

Racial Justice Breakfast

The Annual YWCA Racial Justice Breakfast was established in 2001 to promote the YWCA's mission to eliminate racism and create a safe space where participants can confront racism. Attendees experience meaningful dialogue about racism's personal and community-wide effects and hear from keynote speakers who have had a national impact on landmark civil rights cases. This year, YWCA's 22nd Annual Racial Justice Breakfast was held on Tuesday, Oct. 11th at Music Hall. We had record attendance with almost 600 community attendees and raised almost \$123,000 for YWCA programs.

The remaining \$113,300 in support from KeyBank since 1994 has been directed to both of these events, as well as additional support for our DVSP, International Women's Day, and Annual Fund.

It is evident to our organization that KeyBank is committed to serving the needs of low- and moderate-income communities. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to carry out our mission to empower women and eliminate racism.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

Please feel free to contact me via email (mestes@ywcacin.org) or phone (513) 508-8681.

Sincerely,

Michelle Estes

Michelle Estes
Development Officer, Foundation Relations
mestes@ywcacin.org
(513) 508-8681

February 28, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Adun Spice Company works to provide our Cleveland community with quality sourced and created spices and spice blends. Through our passion for food, we have had the opportunity to share more information and educate our customers about our local foodways, urban farming, and what it means to truly support local by sharing other small businesses that are likeminded in sharing and providing intentional and inclusive food knowledge and availability. KeyBank helped by providing capital to expand what we started in 2020 and grew online in 2021. We were able to grow into a retail space, providing a safe and comforting space for the inquisitive cook, those looking to create good food memories with loved ones, and still do our best to give back to other small businesses that are fighting to grow and to those doing the work to feed the community.

KeyBank has been an engaged partner and has supported Adun Spice Company to supply all cooks with ingredients to help discover the way they want to cook and provide nutrients and delicious flavors to themselves, their family, and loved ones.

This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by highlighting the work we have always loved doing, and that is showing our support to other small business owners in Cleveland, as well as showcasing the full importance of legacy and supporting local. This support from Key is not only limited to a national commercial featuring my small business, but how we are all connected. This support increased when I decided to apply for my first business loan (SBA 7a) with Key.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to share our story of support, and show other small businesses that KeyBank is here to help and support the growth of small business in Cleveland and keep us thriving.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at [REDACTED] or email me at [REDACTED]

Thank you and be well,

[REDACTED]

Owner

Adun Spice Company



Monday, March 6, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306
Via email to CommunityAffairs@occ.treas.gov

Board of Directors

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Re: KeyBank’s CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank’s Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

America SCORES Cleveland works to inspire urban youth to lead healthy lives, be engaged students, and have the confidence and character to make a difference in the world. Our innovative tri-curricular approach teaches kids how physical activity, creative expression and teamwork nurtures a strong body, mind, and character. In 2004 America SCORES Cleveland was founded. While part of a national network that has touched the lives of over 100,000 youth internationally, America SCORES Cleveland operates as an independent 501(c)(3) organization.

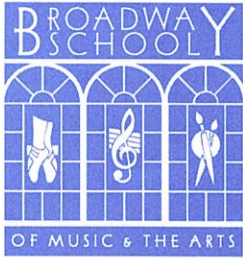
Our participants in Cleveland – of which more than 90 percent live below the poverty line- improve academically, increase physical fitness, and have a greater sense of confidence and belonging. America SCORES unique tri-curricular youth development programs are age-appropriate and aligned to Ohio’s English Language Arts and Physical Education Content standards, address all five of the Social and Emotional Learning Core Competencies and meets The Ohio Afterschool Network guidelines for providing quality afterschool programming. In addition, our physical activity/health outcomes reach Tier I-III standards of Every Student Succeeds Act. SCORES currently partners with 16 Cleveland Metropolitan Schools, the City of Cleveland Recreation centers, and various community non-profits in 12 diverse neighborhoods within Cleveland to serve 2,000 youth each year.

KeyBank has been an important partner for our organization for more than a decade demonstrating their ongoing commitment to serving low- and moderate-income neighborhoods through their leadership, financial support, expertise, and countless volunteer hours serving our organization. From 2019 to 2021, America SCORES Cleveland has benefitted from KeyBank professionals serving on our board in leadership positions, volunteering their time, talent and treasures, and advocating for our organization. Currently we have two KeyBank professionals serving on our Board of Directors as the board chair and vice chair. KeyBank’s partnership and engagement have allowed us to be responsive in meeting the needs of our community to deliver free, high-quality afterschool programming.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community. If you have questions, please contact me at 419-783-7634 or ablack@americascoroscleveland.org.

In service of our Poet-Athletes,

Alison Black, MSSA, LISW-S
Executive Director



Path to confidence,
creativity and joy

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March 14, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at
cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Founded in 1981, the Broadway School of Music & the Arts (BSMA) seeks to *enrich the lives of people by providing access to high-quality, diverse arts and music instruction and programming*. Like other member schools of the National Guild for Community Arts Education, BSMA provides these services to all individuals regardless of age, race, religion, level of ability, or financial means.

More than 2,821 individuals were directly involved in or directly benefited from the Broadway School of Music & the Arts programs in 2021-22, including 1,399 youth. Programs provided by 22 teaching artists took place both at our building and through 33 partnerships with public schools and community agencies across Cleveland serving children pre-K through high school, as well as older adults.

Throughout its history, BSMA has been committed to providing *access* to quality arts educational programming, particularly to underserved children, our primary audience. BSMA is located in one of Cleveland's poorest neighborhoods, Broadway/Slavic Village, which had a 2019 estimated 5-yr. poverty rate of 39.8%, including 55.6% of families with children living below the poverty level.

To serve our neighboring community, our onsite tuition and program fees remain below market rates, and ***over the past 22 years, BSMA has provided over \$125,000 in tuition assistance to needy students from our limited financial aid fund***. Over half of our private lesson students now receive such assistance covering up to 95% of their tuition, and we to loan instruments to students without them. With outside grant funding, we are able to offer our youth drum corps for just \$10/yr. to participants, and to provide many outreach programs free to community members. Our combined onsite and outreach student body is approximately 75% African-American and ranges in age from 3 to senior adults.

KeyBank encourages its teammates to provide expertise through volunteerism and board service. Their teammate has supported Broadway School of Music & the Arts mission to enrich people's lives through free and affordable arts instruction by engaging as an active board member and volunteer. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community through a teammate's invaluable engagement on our Board, through regular philanthropic support, and through enthusiastic volunteer teams of KeyBank employees sprucing up our grounds and building during KeyBank's annual Neighbors Make the Difference Day.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to provide high-quality arts learning experiences to people of all ages in our community who otherwise would not have access to such instruction.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at 216-641-0630, or email me at broadwaysch@yahoo.com.



Barbara Bachtell
Executive Director

Akron Children's Hospital Foundation

March 3, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

*Shelly E. Brown, MAOL, CFRE
Vice President, Development
and
Executive Director, Foundation*

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Akron Children's Hospital works to improve the health of children and our community. At Akron Children's Hospital, we continue to deliver our three founding promises of treating every child as if they were our own, treating everyone how they want to be treated and turning no child away for any reason, including inability to pay.

KeyBank has been an engaged partner and has supported Akron Children's Hospital in continuously improving the health of our community. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by supporting our ASCEND program (Assuring Success with a Commitment to Enhancing Nurse Diversity). ASCEND allows us to grow the needed healthcare workforce while delivering experiences to diverse, low- and moderate-income families who may otherwise not be able to pursue this educational track. KeyBank also supports various other initiatives that help with the area of greatest need throughout the Akron Children's Hospital footprint, often focusing on social determinants of health and behavioral health.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to grow our healthy community initiatives and our workforce.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at (330) 543-8900 or email me at mbrown2@akronchildrens.org.

With gratitude,



Shelly Brown
Executive Director, Foundation
Akron Children's Hospital



The Power of a Permanent Address.™

March 1, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

CHN Housing Partners has over 41 years of experience as an affordable housing developer, housing stability service provider and residential lender. Our organization was founded in 1981 by a group of community development corporations to address housing abandonment and the lack of quality, affordable housing in Cuyahoga County. Our role was to pool and share financial, construction and management expertise in targeted areas. In 1987, CHN used the newly created Low-Income Housing Tax Credit (LIHTC) to design its Lease Purchase Program, a 15-year pathway to homeownership for families earning 60% or less of the area median income. Today, CHN's model is replicated across the country to help low-income families achieve affordable, sustainable homeownership. CHN also develops and manages multi-family homes for low-income families, seniors, individuals with disabilities and individuals experiencing chronic homelessness in Cuyahoga County.

In addition to affordable housing, our work focuses on energy conservation and lead intervention, utility and emergency assistance, counseling and education, community building and engagement and residential lending through CHN Housing Capital, our nonprofit Community Development Financial Institution (CDFI), which provides scalable access to capital for communities of color, low- to moderate-income homebuyers and homebuyers in low-income census tracts of Cuyahoga County.

2999 Payne Avenue, Suite 134
Cleveland, Ohio 44114
P: 216-574-7100
www.chnhousingpartners.org





The Power of a Permanent Address.SM

KeyBank has supported CHN's mission to leverage the power of affordable, stable housing to change lives and improve communities for many years. Through support for our homeownership readiness efforts, our affordable housing developments, our CDFI's work in low- to moderate-income communities, our efforts to help families claim their Earned Income Tax Credit, and so much more, KeyBank is one of CHN's closest partners and most generous funders. In recent years, KeyBank has:

- Contributed \$400,000 awarded in 2021 (a 4-year grant) for the Family Success Initiative, our program that helps families become ready for homeownership.
- Awarded our lending arm, CHN Housing Capital, \$250,000 (a 3-year grant) to support our efforts to improve access to residential lending in low- to moderate-income communities.
- Consistently sponsored CHN signature events, such as our biennial Appreciation Event, and our annual Believe in Home 5K.
- Invested in many CHN developments, most notably our multifamily and permanent supportive housing buildings. In 2019, KeyBank invested \$4.7 million in Legacy at St. Luke's, a 27-unit development in Cleveland, and in 2021, invested nearly \$11.5 million in New Granada Square Apartments, a 40-unit development in Pittsburgh.
- Provided construction loans for many CHN developments over the years, including a \$3.3 million loan for Legacy Village in 2019 and an \$11.5 million loan for Granada Square in 2021.
- Provided a \$602,000 line of credit for our Chevybrook Estates development in Parma, Ohio.
- Consistently sponsored our Earned Income Tax Credit (EITC) Super Refund Saturdays. That sponsorship includes financial support and a significant number of trained volunteers (more than 40 each year). Additionally, KeyBank's CRA staff spend many hours helping us plan the event, tending to logistics and developing marketing materials.

This support demonstrates KeyBank's commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments and volunteerism. KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear and have allowed us to be responsive to community needs, serving more than 50,000 residents annually.

We are grateful for KeyBank's support and look forward to continuing our partnership as we work together to meet the needs of our community. If you have questions, please contact me at (216) 774-2417 or email me at knowak@chnhousingpartners.org.

Sincerely,

A handwritten signature in black ink that reads 'K.J. Nowak'.

Kevin J. Nowak
Executive Director

2999 Payne Avenue, Suite 134
Cleveland, Ohio 44114
P: 216-574-7100
www.chnhousingpartners.org





March 13, 2023

**The City Club
Board of Directors**

Kristen Baird Adams
President
Louis Chaiten
Vice President
John J. McGuire
Vice President
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Vice President
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Kaye Ridolfi
Mark Ross
Alex Schmitt
Fareed Siddiq
Nigamanth Sridhar
Charles Stack
Sheila Wright

Stanley Poszywak
OCC Examiner-in-Charge
Large Bank Supervision
Office of the Comptroller
via email: CommunityAffairs@occ.treas.gov

RE: Key Bank, CRA Comment

Dear Mr. Poszywak,

I want to tell you a story about last Monday. Pulitzer Prize winning author Andrea Elliott was on stage in downtown Cleveland, speaking to roughly 500 people who had read her book *Invisible Child: Poverty, Hope, and Survival in an American City*. This was a conversation about family homelessness, foster care, and the cracks in our social fabric that too many families fall through. After Ms. Elliott spoke, we invited the audience to offer their questions. While that's usually a very engaging part of our forums, the most poignant moment came when a young woman who identified herself as having been a part of the foster system asked a question. The entire theatre leaned in. This conversation wouldn't have happened if not for Key Bank.

I lead the City Club of Cleveland, one of our nation's oldest and most significant free speech forums. Our mission is to create conversations of consequence that help democracy thrive. We present about a hundred forums every year. The one I describe above is just one of the many made possible by Key Bank's direct financial support. Every year, they provide vital financial support that allows us to welcome the community to hear from visiting authors, thinkers, and advocates. They also sponsor our State of the City and State of the Schools events, vitally important civic dialogues that welcome hundreds and hundreds of our neighbors to conversations with the leaders of our city and our schools.

The bank has been a partner to that work for decades, and I have to come to think of them as integral to our success. Their support directly underwrites access to our events for members of our community. They have supported free transit passes to our large free off-site forums; they have supported student attendance at our State of the Schools; and they continue to be invaluable collaborators and supporters through board service, participation at events, and thought and planning partnership. Together, we are able to meet the civic engagement needs of our community.

If I can provide any more information or answer any questions you might have, please don't hesitate to reach me at dmoulthrop@cityclub.org or by phone at 216.621.0082.

Sincerely,

Dan Moulthrop
Chief Executive Officer

March 7, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

City Year Cleveland helps students and schools succeed. Our mission is to ensure that every student, especially those who face inequity, has access to caring adult mentors, positive learning environments, and the educational resources they need for school and future success.

KeyBank has been an engaged partner and has supported City Year Cleveland to provide research-based interventions in attendance, social-emotional learning, math and literacy to students in Cleveland's Buckeye/Shaker, Central and Slavic Village neighborhoods, helping them to build the skills and mindsets that underpin lifelong achievement. This support demonstrates Key's commitment to serving low- and moderate-income neighborhoods through philanthropy and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community through philanthropic support and through Board participation/volunteering by multiple senior leaders at Key.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to sustainably operate our signature Whole School, Whole Child (WSWC) program within the Cleveland Metropolitan School District (CMSD) and at Breakthrough Public Schools' Village Prep & E Prep Cliffs Campus (grades K-8). KeyBank is a committed and major supporter of WSWC since the program began in 2010.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at (216) 373-3408 or email me at tcomer@cityyear.org.



Toi Comer

Senior Vice President & Executive Director



Investing For Impact
1240 Huron Rd. E, Suite 300, Cleveland, OH 44115
clevelanddevelopmentadvisors.com
p 216 592 2274 | f 216 592 2248

March 14, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Cleveland Development Advisors (CDA) works to promote access to real estate and business lending that advances community impact, stabilizes markets, and catalyzes future investment and development in underserved communities. CDA has multiple tools and affiliate funds to help advance equitable real estate development in Cleveland, Ohio. This includes Cleveland Development Advisors Community Reinvestment Fund, Inc., a nonprofit certified by the Community Development Financial Institutions Fund (CDFI Fund) as certified CDFI; as well as Cleveland New Markets Investment Fund II, LLC, a certified Community Development Entity (CDE) by the CDFI Fund.

KeyBank has been an engaged partner and has supported Cleveland Development Advisors to build inclusive and thriving neighborhoods in Northeast Ohio by providing innovative financing solutions and technical assistance to catalytic real estate and business development projects. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by having participation on our Board of Directors. [REDACTED], National Manager of Community Development Lending and Investment, KeyBank and President, Key Community Development Corporation, currently serves on CDA's Board of Directors and was appointed on December 10, 2021. Prior to [REDACTED] joining the CDA Board, [REDACTED], Executive Vice President & Regional Sales Executive, Central Region, served on CDA's Board of Directors from March 28, 2019 to December 10, 2021 and [REDACTED], served on CDA's Board of Directors while he was Midwest Regional President from December 3, 2015 to March 28, 2019.

Additionally, in 2021, KeyBank made a \$7,500,000 investment commitment to a CDA affiliate fund which is managed by our CDFI, to Opportunity CLE Loan Fund, LLC (OCLF). The purpose of OCLF is to support transformative, strategic and catalytic projects that provide a positive and social economic benefit to targeted low-income communities across Northeast Ohio, with a focus in Cuyahoga County. OCLF will deploy capital into projects with a purpose of revitalizing or stabilizing low-or-moderate-income areas and/or underserved or distressed metropolitan middle-income areas; or providing affordable housing, for or community services targeted to, low-or moderate-income persons.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to advance Greater Cleveland for over 30 years. KeyBank has been a long-time supporter of CDA and has invested a total of \$45 million into CDA, as well as having representation on CDA's Board of Directors. To date, CDA has invested more than \$510 million in over 167 projects in Greater Cleveland, of which over 95% has been invested in projects that are located within low -moderate income communities and/or primarily serve low-moderate income individuals.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at 216-592-2363 or email me at yittu@greatercle.com.

Sincerely,



Yvette M. Ittu
President & CEO
Cleveland Development Advisors, Inc.





Cleveland State University Foundation

March 10, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

The Cleveland State University Foundation exists solely to raise, receive and manage private gifts for the advancement and benefit of Cleveland State University (CSU). Historically, the KeyBank Foundation has been a strategic partner in advancing CSU's educational mission and supporting student success initiatives to increase student retention and graduation rates. In 2021, KeyBank awarded a \$1 million gift to help CSU further prepare students to be actively engaged citizens who have a positive, direct impact on their communities. The Beth E. Mooney Center for Transformative Leadership honors Mooney and her unwavering commitment to diversity, equity and inclusion. In addition, the Foundation provides funding for an accounting internship to support minority-owned businesses in the area.

Cleveland State University's long-standing partnership with KeyBank has been instrumental in serving low- and moderate-income students in their pursuit of a college education. KeyBank is an annual sponsor of our signature fundraiser that provides scholarships for college tuition. The student body of more than 15,000 includes those who are first in their family to attend college, as well as later-career, non-degree professionals. One-third of CSU students are from under-represented minority populations and many students work multiple jobs to support their families. According to the CSU Financial Aid Office, 39% of our undergraduate students are Federal Pell Grant-eligible. Of the Pell Grant-eligible students, 21% are a Zero Expected Family Contribution.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our campus community by investing in CSU's education priorities. Furthermore, [REDACTED], private banking executive and national director of channel management and client acquisition for Key Private Bank, serves as chair of the CSU Board of Trustees and Sr. Vice President and Manager, Community Relations and Corporate Initiatives for KeyBank, [REDACTED] is the chair-elect for the CSU Foundation Board of Directors.

KeyBank's partnership and engagement have allowed us to be responsive to the financial needs of our students, as well as the increased demand for support services have helped us to earn national recognition as the best public university in Ohio for helping economically disadvantaged students graduate, start careers and get ahead financially, according to *U.S. News & World Report*. The magazine's 2022 Best Colleges rankings rate CSU #1 among public universities in Ohio and 127th nationally for social mobility.

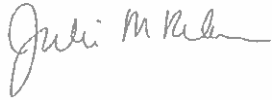
CLEVELAND STATE UNIVERSITY FOUNDATION
2121 Euclid Avenue
UN 501
Cleveland, OH 44115-2214

Campus Location
Union Building
1836 Euclid Avenue, Suite 501
Cleveland, OH 44115-2214

T 216.687.5522
F 216.687.9270
giving@csuohio.edu
supportcsu.org
csuohio.edu/giving

CSU also furthers the prosperity of Northeast Ohio businesses by developing the next generation of talent for the region. More than 80% of our graduates choose to live, work, and raise their families here. We look forward to continuing our partnership with KeyBank as we work together to meet the educational needs of our students.

If you have questions, please contact me at 216.762.7151 or email me at j.rehm@csuohio.edu.



Name: Julie M. Rehm, Ph.D.

Title: Vice President Advancement, CSU and Executive Director, CSU Foundation

CLEVELAND STATE UNIVERSITY FOUNDATION
2121 Euclid Avenue
UN 501
Cleveland, OH 44115-2214

Campus Location
Union Building
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March 10, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
KeyBank
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

The first organization of its kind, College Now Greater Cleveland works to increase postsecondary educational attainment through college access and career advising, financial aid counseling and scholarship and retention services. Our community continues to be impacted by generational poverty and racism that too often deprive people of their access to postsecondary education and the resulting benefits of postsecondary educational attainment. By 2025, 65 percent of jobs in Ohio will require a postsecondary credential or degree, and in Greater Cleveland alone, 75 percent of current available jobs require at least some college, while 42 percent of jobs require a degree. Increasing the rate of postsecondary education attainment by just one percent would boost the region's economy by \$2.8 billion annually and provides opportunities for people to succeed in a career and increase their earning potential.

KeyBank has been an engaged College Now partner since 2012 and continues to support our mission through generous financial support and robust volunteer leadership. KeyBank helped create and has supported College Now with \$60,000 each year since 2012 for our Early Action for the Motivated Middle program, in which a cohort of approximately 180 Cleveland Metropolitan School District (CMSD) juniors and seniors receive in-depth, case-managed, individualized college access support. Qualifying students are invited to participate in Early Action by their College Now advisor in their schools and are college-ready as defined by having earned a GPA of 2.5+ and a 960-1190 on the SAT. Though college-ready, these students fall shy of qualifying for special programming and supports available to the lowest and highest achieving CMSD high school students. With KeyBank's support of this program, College Now to provide college entrance exam preparation, essay feedback, access to technology, career exposure, college visits and well as a stipend.

Each student who receives a College Now or a Say Yes Cleveland scholarship is paired with a College Now mentor for four years of a student's postsecondary educational journey. KeyBank has been the exclusive title sponsor of Bags & Bourbon (formerly the Bag Lady Event), our bi-annual fundraiser for the Mentoring Program. Our most recent Bags & Bourbon took place in April 2022 and netted \$475,000, with KeyBank contributing \$50,000 as the title sponsor. Additionally, KeyBank has already committed \$50,000 for next year's fundraiser.

College Now is proud that, as of December 2022, 56 KeyBank employees currently serve as volunteer mentors to our college scholarship recipients. We've also had tremendous engagement from KeyBank on our Board of Directors. [REDACTED], regional executive, Northeast Ohio and Central region, Key Private Bank, joined College Now's board in 2021, is a mentor and also co-chairs our professional advisory council. [REDACTED], KeyBank chief of staff and director, Corporate Center, is a former board member. In addition, KeyBank provided us with important financial information and materials to help the parents of students with whom we work become more financially astute. We look forward to furthering our work with parents.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and help us provide the necessary wraparound services to students so that they have the tools they need to excel in the career of their choice, creating generational wealth for their families and contributing to our region's economy.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at lfriedman@collegenowgc.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee Friedman". The signature is fluid and cursive, with the first name "Lee" and last name "Friedman" clearly distinguishable.

Lee Friedman
Chief Executive Officer



Where futures begin™

March 6, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

KeyBank has been a steadfast and vital partner in the mission of Cuyahoga Community College (Tri-C), which is to provide high-quality, accessible and affordable education to promote individual development and improve the overall quality of life in a multicultural community. Through significant philanthropic support and volunteerism, KeyBank has invested heavily in the success of Tri-C and its students. Therefore, I am pleased to provide these comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Cuyahoga Community College works to provide education and training for 41,000 students a year and offers associate degrees and industry-recognized certificates and credentials at a low-cost. Our student population reflects our diverse community. Forty percent of Tri-C's students are minorities, 58% are first-generation college students, 75% are part-time and more than 75% of students are low- and moderate-income. KeyBank's investments in Tri-C scholarships and programs are truly life-changing for our students, their families and our region.

Since 1993, KeyBank has played an integral role in ensuring people can access education and training who otherwise would not be able to attend Cuyahoga Community College. From **2019-2021** specifically, KeyBank's partnership has helped to remove barriers and increase access to high-quality education, training and community outreach programs. During this period:

- Chris Gorman, President and CEO of KeyBank, has served as co-chair of a transformational Tri-C campaign, *Skills to Succeed*, which kicked off in 2019 and has successfully raised \$50 million to close the workforce skills gap by supporting students in-need with the goal to create inclusive prosperity for all.

Office of the President

District Administrative Services | 700 Carnegie Avenue | Cleveland, Ohio 44115-2878
216-987-4851 | Fax 216-987-4848

Cuyahoga Community College is an affirmative action/equal opportunity institution.

- [REDACTED] KeyBank's Chief of Staff and Director of Corporate Center served as a Tri-C Foundation Board Member from 2014-2021 where she led the Foundation's strategic planning effort and served as Board Chair in 2019.
- KeyBank support enabled 416 scholarships totaling \$631,700 to be awarded to students with financial need from 2019-2021 through the KeyBank Creative Arts Scholarship Fund, KeyBank Hispanic Endowed Scholarship Fund, and KeyBank Business Endowed Scholarship Fund.
- KeyBank broadened access to Tri-C's JazzFest as its presenting sponsor for the past nine years. JazzFest is a nationally-recognized educational jazz festival that celebrates Cleveland's cultural diversity and jazz heritage. KeyBank helped eliminate barriers and provide access to world-class performances and programming. Over 112,000 individuals engaged in enriching experiences while enjoying "America's music" through this partnership.
- KeyBank invested a \$1.4 million multi-year grant in Tri-C's Public Safety and Education Training Center which spanned 2016 through 2019. This support enabled Cuyahoga Community College to expand and enhance public safety education through significant scholarships and outreach and has led to a more diverse workforce, reflective of our core communities.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities is demonstrated by their significant investments in Cuyahoga Community College. KeyBank supports Tri-C as they know their support helps students in-need, and that a Tri-C education can decrease employment and income inequity. We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at 216-987-4850 or email me at Michael.Baston@Tri-C.edu.

Sincerely,



Michael A. Baston, Ed.D., J.D.
President
Cuyahoga Community College



3659 Green Road
Suite 220
Cleveland, OH 44122
p. 216-752-3000
f. 216-752-4974
www.diversitycenterneo.org

February 23, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021. The Diversity Center of Northeast Ohio works to eliminate bias, bigotry, and racism, through advocacy and education. We teach acceptance and work to build communities where all people are connected, respected, and valued.

KeyBank has been an engaged partner and has supported The Diversity Center of Northeast Ohio in its mission to eliminate bias, bigotry, and racism in northeast Ohio. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by providing philanthropic support of our annual Humanitarian Award Celebration and Walk, Rock, Roll and Run events, enrolling employees in our LeadDIVERSITY program, as well as employees volunteering and participating in the Walk, Rock, Roll and Run event each year. We have also had a KeyBank employee serve on our board of directors for many years.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us by providing grants to do specific school and youth programming in the Cleveland Metropolitan School District.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at 216-752-3000, or email me at pzfisher@diversitycenterneo.org.

Sincerely,

A handwritten signature in blue ink that reads "Peggy Zone Fisher".

Peggy Zone Fisher
President & CEO



**Esperanza's
Board Officers**

Carmen Castro-Rivera
President
Baldwin Wallace University

Pam Hobe
1st Vice President
PNC

Jaime Caraballo
2nd Vice President
DealerTire

Camila Negret
Secretary
PwC

Directors

Laura Almazan
Eaton Corp.

Anna Avelar
Gannett

Adelaida Mihu
Biogen

Richie Bachala
Yugabyte

Eric Logan
KPMG

Bill McCarron
Huntington Bank

Stephanie Milk-Wade
Masco

Edgar San Jose
The Timken Company

Leslie Suffredini
Stanley Black & Decker

Jose Torres
Cuyahoga County

Presidents Emeriti
Al López (1944-2014)

Luis Martinez

Felicia Soto

Executive Director
Victor Ruiz

2/28/2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

The mission of Esperanza is to empower Northeast Ohio Hispanic/Latinx communities to flourish by equipping learners for educational attainment and lifelong success. Since 1983, Esperanza has helped Northeast Ohio's Hispanic/Latinx community access education and employment. Our mission has since grown to include postsecondary scholarships and comprehensive academic support services geared toward middle school, high school, and postsecondary students.

KeyBank has been an engaged partner and has supported Esperanza's mission and work for decades through financial support, board representation, and internship opportunities for our students. From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by providing us with over \$375,000 in financial support and over 100 hours of board service. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to serve thousands of people. As a result we have provided college scholarships to hundreds of students, and have helped our students graduate high school and college at rates higher than the local and national average (over 90%).

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community. If you have questions, please contact me at 216-651-7178 or email me at victor@esperanzainc.org.

Sincerely,

Victor A. Ruiz
Executive Director



3841 Washington Park Blvd.
Newburgh Heights, OH 44105
216.641.7799
firstteecleveland.org

Board of Directors

Ronna McNair
Chair
Craig Glazier
Chair-Elect
Patricia Tomko
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Sonal Robinson
[REDACTED]
Steve Srmag
Dawn Swit
Kevin Thomas
Rob Walker
Lorna Wisham

Chair Emeriti

Andre' Thornton
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Ann Harlan
Trent Meyerhoefer
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Patricia A. LoPresti
Executive Director
David Alexander, PGA
Paula A. Domzalski
Brian McFarland
Mary P. Patton
Mike Reiter
Dorothy Kasper
Michael Lisman

March 9, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act Exam conducted by the Office of the Comptroller of the Currency.

First Tee – Cleveland – a youth development organization that enables kids ages 6-18 to build the strength of character that empowers them through a lifetime of challenges. By seamlessly integrating a life skills curriculum with the game of golf, First Tee creates active learning experiences that build inner strength, self-confidence and resilience.

Our chapter has created strong partnerships with over 30 community partners, many in Cleveland's inner city, in true collaboration by sharing resources and programs. Additionally, we have secured a partnership with the Cleveland Metropolitan School District through which over 14,000 kids in all CMSD K-8 schools will experience our program by the end of 2024.

When the pandemic hit, our chapter pivoted to create new ways to deliver our program to deserving local youth. Kids in our community, especially in the underserved neighborhoods, were hit hard. They experienced lack of access to learning and lack of access to social and emotional support. Our team revised our curriculum, made smaller class sizes and created a safe environment for outdoor programs. Our chapter served more kids through the pandemic than any other time in our 20-year history.

We could not accomplish all of this without the time, talent and treasure of our Board of Trustees, our Ambassadors Committee (young professionals), and volunteer coaches. We are blessed to have longstanding support and representation from **KeyBank** on the board level and the Ambassadors. Since 2018, one particular Ambassador, a KeyBank teammate, has gone over and above in terms of involvement by planning and attending fundraisers and contributing to our success. She is passionate about our mission to instill core values in local youth and is a true leader and asset to First Tee – Cleveland.

KeyBank has been a valued corporate partner, supporting our annual events as well as our capital campaign to add an Activity Center to host year-round programs for low-income families in the community. From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by lending philanthropic support, board participation and volunteerism. KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are admirable.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community. If you have questions, please contact me at 216-641-7799 or email me at plopresti@firstteecleveland.org.

Kind regards,

Patricia LoPresti
Executive Director



3615 Superior Avenue | Bldg 44, Suite 4403A
Cleveland, OH 44105
(P) 216.456.2086
breakthroughschools.org

March 1, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

We would like to provide our comments in advance of KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Breakthrough Public Schools is a nationally recognized network of free, high-performing public charter schools in Ohio. Our mission is to develop a growing network of distinctive school options that prepare Cleveland area students for success in life. We currently have five campuses serving nearly 3,100 students in low-income neighborhoods throughout the city. Our campuses are located in the Glenville, St Clair - Superior, Mt. Pleasant, Union Miles, and Cudell communities. Unfortunately, nearly all our students are living below the poverty line. Our long-term vision is to further Greater Cleveland's transformation by providing distinctive school options to thousands of Cleveland's K-8 students. Our work, in partnership with CMSD and others, will help the city reach a tipping point towards providing a high-quality education for all.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. As a critically important partner for our schools, Breakthrough has benefited from KeyBank's continued leadership and financial support since we formed in 2010. From 2019 to 2021, two senior KeyBank professionals have supported Breakthrough Schools serving on Friends of Breakthrough, our fundraising and advocacy board, as well as many KeyBank volunteers advocating, fundraising, and assisting alumni on behalf of our students and schools. We also have a KeyBank executive currently serving on the Breakthrough Board of Directors. Through all of these volunteer supportive interactions, KeyBank's partnership and engagement allow us to respond proactively to meet our community's need for delivering high quality education to our scholars.

We appreciate the years of committed partnership KeyBank has contributed to Breakthrough Public Schools, and we look forward to continuing our partnership well into the future. If you have questions, please feel free to contact us at RJohnson@breakthroughschools.org or JZitzner@breakthroughschools.org.

With Gratitude,

A handwritten signature in black ink, appearing to be "R. Johnson".

Ralph E. Johnson, CEO, Breakthrough Public Schools

A handwritten signature in black ink, appearing to be "John Zitzner".

John Zitzner, President, Friends of Breakthrough

OUR SCHOOLS

E Prep & Village Prep Woodland Hills
9201 Crane Avenue

E Prep & Village Prep Cliffs
1417 E 36th Street

E Prep & Village Prep Willard
9401 Willard Avenue

**Citizens Academy Southeast &
Citizens Leadership Academy Southeast**
15700 Lotus Drive

**Citizens Academy Glenville &
Citizens Leadership Academy Glenville**
12523 Woodside Avenue

March 13, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Global Ambassadors Language Academy (GALA) works to **provide a tuition-free, public K-8 education for primarily economically disadvantaged students of color in the city of Cleveland. GALA provides a rigorous academic program that is delivered in a bilingual setting in both Mandarin Chinese and Spanish, in which students are immersed in Mandarin/Spanish daily for 50-70% while learning the language, Math, Science, and Social Studies.**

KeyBank encourages its teammates to provide expertise through volunteerism and board service. Their teammate has supported **Global Ambassadors Language Academy (GALA)** to **ensure each student achieves lifelong academic success, bilingualism, and appreciation for diversity, in an engaging and academically rigorous language immersion environment**, by engaging as an active board member and volunteer. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by **philanthropic support, board participation, and staff volunteering.**

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to **further the mission of Global Ambassadors Language Academy (GALA).**

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at **216.370.8006** or email me at MRogers@GALACleveland.org.

Sincerely,



Meran Rogers

Founder and Executive Director

Global Ambassadors Language Academy (GALA)



March 16, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Submitted via Email:

- CommunityAffairs@occ.treas.gov
- cra_comment_letter@keybank.com

KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Greater Cleveland Partnership (GCP) works to accelerate growth and prosperity through an All In Plan to achieve the vision of a "Great Region on a Great Lake". KeyBank is a primary partner across all of our priorities: building dynamic businesses, developing talent, generating inclusive opportunity, and developing an appealing community.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community through active leadership on our Board of Directors, committees, and working groups. KeyBank CEO Chris Gorman has served on the Executive Committee of GCP throughout that period and co-chairs GCP's Equity & Inclusion Committee. The Equity & Inclusion Committee has focused on:

- **Growing minority businesses** through advisory services and connections to customer opportunities. Keybank has actively participated in the region's supplier diversity initiatives to create opportunities and has provided advisory support and financial services to select minority enterprises through this effort.
- **Expanding diversity in middle and high-wage jobs** by reducing barriers and developing mentorship networks. Keybank has been a leader in promoting the Equity & Inclusion initiatives with other corporations and large organizations throughout our community.
- **Promoting digital equity** through device donations, affordable broadband, and digital literacy support. Keybank has been a significant device donor in our community campaign.

In addition to that work, Keybank has been particularly active in our Talent Initiatives, specifically on expanding access to technology careers to individuals throughout our region. KeyBank's commitment contributed to a \$5.8M grant award from the Department of Labor for an Equitable Registered Apprenticeship Hub to drive apprenticeship expansion and employment equity in Northeast Ohio. Further, Keybank led by example by becoming an initial employer for tech apprentices.

KeyBank has been an engaged partner on small businesses and has supported the Cleveland Chain Reaction project that creates businesses and jobs in Cleveland's low- and moderate-income neighborhoods through providing education and support for aspiring entrepreneurs. KeyBank serves on the selection committee for this program and provides business advice to the entrepreneurs.

Finally, KeyBank has been an active funder and participant in Cleveland Development Advisors, our real estate affiliate focused on investing in catalytic projects in low-to-moderate income neighborhoods throughout Cleveland. Our affiliate is submitting a separate letter with details on KeyBank's involvement.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at 216-592-2284 or email me at bshah@greatercle.com.

Sincerely yours,

A handwritten signature in black ink that reads "Baiju R. Shah". The signature is written in a cursive, flowing style.

Baiju R. Shah
President & CEO

6701 Carnegie Avenue, Suite 100
Cleveland, Ohio 44103



www.jumpstartinc.org • follow us: @jumpstartinc

February 26, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak,

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

JumpStart's mission is to unlock the full potential of entrepreneurship to transform entire communities. In partnership with the KeyBank Foundation, we provide greater access to capital, services, and connections in Ohio, generating over \$10B in annual economic impact in Ohio since 2010.

KeyBank has been an incredibly engaged partner providing over \$25M in charitable support to JumpStart Inc. to enable it to make progress in advancing its mission. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

A member of KeyBank's senior leadership team serves on our Board of Directors, and KeyBank's support in 2021 allowed JumpStart to work with small businesses in low- and moderate-income communities in Northern Ohio to create \$171M in economic impact, including \$94M in labor income, \$18M in federal and \$10M in state and local taxes while creating/supporting 1,971 jobs and 1,326 households. KeyBank also provided support in 2019 and 2020. As a result, JumpStart's efforts during these years generated a total economic impact that exceeded \$300M in low- and moderate-income communities.

Since 2017, I've also had the privilege of serving on KeyBank's National Advisory Council to represent the community in overseeing progress against the plan's objectives and sharing insights on community needs. Through the council, I received regular updates on KeyBank's strong performance and ultimate achievement of the commitments made through the National Community Benefits Plan.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at 330-310-2535 or Ray.Leach@JumpStartinc.org.

Sincerely,

A handwritten signature in black ink, appearing to read "R. T. Leach".

Ray T. Leach, CEO

Board of Directors

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President + CEO

Tony F. Sias

March 16, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at
cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Karamu House is a place where people from different races and backgrounds use the arts as a mighty platform to educate, celebrate, and activate around cultural touchstones. Karamu embodies the principles of inclusion and contributes to the livability of Greater Cleveland through its arts-based concentration on social relevancy.

KeyBank has been an engaged partner and has supported Karamu House to produce professional theatre, provide arts education, and present community programs for all people while honoring the Black experience. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community through its generous philanthropic support.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to continue producing and presenting important artistic and social justice content during a seminal moment in our community and our country when the twin pandemics of COVID-19 and racial reckoning occurred in the spring of 2020. Through its instrumental lead sponsorship of Karamu's original production "Freedom on Juneteenth," a history of the African American experience and a call to action, Key provided critical support to our institution and to the geographic and cultural communities we serve.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community. If you have questions, please contact me at 216-795-7074 or email me at tsias@karamuhouse.org.

Sincerely,



Tony F. Sias
President + CEO



March 9, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Minds Matter Cleveland provides intensive out-of-schooltime programming to prepare students from low-income households to earn college degrees in order to ensure stable workforce participation, diverse corporate and civic leadership, and intergenerational economic mobility.

KeyBank encourages its teammates to provide expertise through volunteerism and board service. Two of their teammates have supported Minds Matter Cleveland as a volunteer mentor, working to connect driven and determined students from low-income families with the people, preparation, and possibilities to succeed in college, create their future, and change the world by engaging as an active board member and volunteer. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by having volunteers represented among our tutor and mentor corps.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to tutor and mentor students from low-income families.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at **440-836-3156** or email me at sara@mindsmattercleveland.org

Sincerely,

A handwritten signature in black ink, appearing to read "Sara Elaqaad".

Sara Elaqaad
Executive Director
Minds Matter Cleveland

NewBridge

3634 Euclid Ave, Suite 100
Cleveland, OH 44115
216-867-9775

Michael Adams
Swagelok

Stephen Caviness
Team NEO

Jason Drake
(Vice-Chairman of the Board)
Dan T. Moore Co.

Roger Frank
(Secretary of the Board)
Little Jacket

Heather Frutig
Gradient

Jennifer Gaglione
PPLSI

Richard Gibson
Elizabeth Baptist Church

[REDACTED]

Ron Goldfarb
Goldfarb Weber Creative

Eric Gordon
(ex-officio)

Cleveland Metropolitan School System
Oliver (Pudge) Henkel
(Director for Life)

Cleveland Clinic (Retired)

Samantha Holmes
Cleveland Metropolitan School District

Robbin Hudson
(Chairman of the Board)
Gradient

David D. Legeay
Glenmede

Dave Lupyan
Lupyan & Associates

Anne Nelson
Cleveland State University

Alan K. Nevel
The MetroHealthSystem

Grafton Nunes
Cleveland Institute of Art

Laritsa Ortiz
Eaton

Lydia Pitts
Cleveland Clinic

Ronn Richard
(Ex-Officio)
Cleveland Foundation

[REDACTED]

Kim Shelnick
University Hospitals

Jason Smith
Cleveland Metropolitan School District

Bill Strickland
(Ex-Officio)

Manchester Bidwell Corporation
Jason Tidmore, Sr

Harvey Rice Wraparound School
Jeffrey R. Vlasek

BakerHostetler
Rick Wilmot

1848 Ventures
Dawn Wojnarowski
J.P. Morgan

March 2, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at
cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021

About New Bridge

New Bridge works to positively change the lives of adults and youth in Cleveland who face deeply entrenched economic disparity. Since its founding in 2010, New Bridge has impacted the lives of more than 3,000 youth and adults throughout Greater Cleveland using a combination of workforce skills training and job placement services for adults and arts-infused social-emotional learning programming for youth.

New Bridge's mission is for all students to achieve optimal health by integrating mental and physical well-being and life purpose for themselves and the community. Its vision is one of a vibrant community living to its fullest education and economic potential. To achieve this, New Bridge intentionally fuses mentorship, education, and optimism in a space in which people of all ages have the opportunity to learn.

To avoid duplication of efforts in service in the community, a three-year feasibility study was conducted to assess Cleveland's workforce training and youth leadership development needs before launching the organization in 2010. Today, New Bridge is one of 11 affiliates of the Manchester Bidwell Corporation, Pittsburgh's internationally renowned center for arts and technology, which boasts a 51-year track record of success in transforming the lives of youth and adults.

New Bridge is driven by the principle articulated by Manchester Bidwell founder Bill Strickland: "Every human being, despite the circumstances of his or her birth, is born full of potential, and the way to unlock that potential is to place individuals in a nurturing environment and expose them to the kind of stimulating and empowering creative experiences that feed the human spirit.

To that end New Bridge's workforce training programs offer an opportunity for Clevelanders with low incomes to build the knowledge and aptitudes they need to be hired into well-paying healthcare jobs. New Bridge serves as an innovative training provider because of the no-cost training solutions provided to individuals who would otherwise be screened out of other workforce pathways due to limited basic skills, technical skills, insufficient employability skills, and loan default, which largely stems from previously attempts at traditional post-secondary institutions.

More than 25% of New Bridge's adult students have begun and failed a previous post-secondary education option. To meet these students' needs and to provide opportunity for success, students work to combat past and current traumas through developing SEL competencies related to workplace success, such as relationship skills, responsible decision making, social awareness, and goal-directed behavior.

KeyBank encourages its teammates to provide expertise through volunteerism and board service. Their teammate has supported New Bridge's mission **for all students to** achieve optimal health by integrating mental and physical well-being and life purpose for themselves and the community. **To that end Key Bank has provided an active board member and volunteer.** This support has demonstrated its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by sponsoring equipment for the new Medical Assistant Training Program that is currently in its third cohort, and general funding to aid in the continuation of being able to offer our programming at no cost to our students.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to **support the learning experiences of our students by providing state of the art equipment that resembles the population served within our community and the technology used within our health systems.**

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at **216-205-4583** or email me at ehubbardjr@newbridgecleveland.org.

Sincerely,



Edwin Hubbard Jr.
VP of Development

February 24, 2023

Stanley Poszywak, OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

The Northeast Ohio Hispanic Center for Economic Development (NEOHCED) is a host organization to the Small Business Development Centers program, the Northeast Ohio Hispanic Chamber of Commerce (NEOHCC) and is the lead organization for the redevelopment and placemaking initiative, CentroVilla25. The Small Business Development Center provides bilingual, culturally relevant technical assistance and training to existing and pre-venture businesses in small, group-based training classes or in one-on-one advising sessions. The NEOHCC is committed to promoting and supporting the domestic and international economic development of Hispanic commerce and to serving as a liaison to the Hispanic market in Northeast Ohio. CentroVilla25 will catalyze economic impact through job creation and business development, growing a thriving local economy, and creative placemaking that celebrates the Latino culture of the neighborhood.

KeyBank has been an engaged partner and has supported the **NEOHCED** in its commitment to equitable asset building in Cleveland's Latino, and other underserved communities. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by encouraging their own employees to become part of our Board of Directors, most recently [REDACTED] served on our Board as Treasurer and [REDACTED] served on our Chamber Board. These individuals provided countless volunteer hours and contributed greatly to the strategic focus of the organization.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us in supporting Latino business owners in their growth and development.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at 216.281.4422 or email me at jcontreras@hbcenter.org

Sincerely,



Jenice Contreras
President & CEO

2511 Clark Avenue,
Cleveland, Ohio 44109

T 216.281.4422
F 216.281.4222
E info@hbcenter.org

hbcenter.org





Playhouse Square®

March 17, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Playhouse Square is a not-for-profit performing arts center whose mission is presenting and producing a wide variety of quality performing arts, advancing arts education and creating a destination that is a superior location for entertainment, business and residential living, thereby strengthening the economic vitality of the region. On an annual basis, an average of 1.2 million guests attend a performance, educational program or special event at Playhouse Square, generating an economic impact of more than \$359 million on the regional economy.

Through the years, KeyBank's generous partnership has been unparalleled in the corporate community. Playhouse Square is honored to have KeyBank's name on our largest theatre – the KeyBank State Theatre – as well as our seven-show KeyBank Broadway Series in recognition of its munificent gifts to support our stages. Between 2019 and 2021, KeyBank's grants have been critical to sustaining our leadership status in the industry and propelling Playhouse Square's 44,000+ season ticket holder base to the largest in North America.

Perhaps nowhere has KeyBank's philanthropy had more impact than in supporting our mission to make the arts accessible to people of all backgrounds, means and abilities. In 2017, KeyBank committed \$2.5 million to strengthen Playhouse Square's reach into Cleveland public schools through community engagement and education programming. Cleveland Metropolitan School District (CMSD) is the most under-resourced district in our region with the highest concentration of poverty. Historically disadvantaged in the arts, CMSD students stand to benefit greatly from the 21st century skills and alternative methods of learning provided by arts participation and integration.

The foundation for arts education and the engagement of young people at Playhouse Square is children's theater and, as such, KeyBank chose to specifically direct its long-term support to the Bus and Ticket Subsidies program. This program provides discounted tickets and travel subsidies to eligible school groups, removing the barrier of cost that would otherwise prevent attendance for many.

1501 Euclid Avenue
Suite 200
Cleveland, Ohio 44115

tel 216-771-4444
playhousesquare.org

Stanley Posqwak
March 16, 2023
Page Two

Between 2019 and 2021, KeyBank's gift made it possible for Playhouse Square to serve over 58,000 CMSD students and educators with children's theater and accompanying educational content. This includes the costs of 479 buses to bring over 17,000 students and educators to Playhouse Square for in-person performances in 2019 and 2020. In 2021, when the theaters were closed and all programming was prevented virtually, KeyBank's gift provided 41,163 CMSD students with access to our streaming student matinees.

KeyBank's engagement goes beyond its financial support. Since her 2013 election to the Board of Trustees, [REDACTED] KeyBank Chief Information Officer, has played a pivotal role in the growth and development of Playhouse Square. In July 2020, [REDACTED] stepped into the role of Board Chair and found herself navigating Playhouse Square through the unprecedented challenges posed by Covid-19. Under her steady direction and strong example, Trustees took their engagement to a new level to help keep operations stable and ready for the day when live performance could return to our stages.

KeyBank's commitment and actions to serve the needs of low- and moderate-income populations and enhance the quality of life for all people in our community are clear. We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have question, please contact me at (216) 640-8500 or email me at Craig.Hassall@playhousesquare.org.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Craig', followed by a period.

Craig Hassall AM
President and CEO



March 2, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Say Yes Cleveland provides scholarships and support services to students at the Cleveland Metropolitan School District and our partnering charter schools. In 2019 we made a 25-year commitment to provide post-secondary tuition scholarships to qualified graduates of the school district. These can be used at a four year or two-year college or university, or a Pell eligible trade certificate program. Our program provides these funds to students who live within the boundaries of the school district for all four years of high school and attend a CMSD or partnering charter school for all four years of their high school education. The goal is to increase the number of students who attain a post-secondary degree and can then fill the job openings in our community, enhancing the economic development of the region, while increasing their lifetime income and their family's economic security.

KeyBank has been an engaged partner and has supported Say Yes Cleveland to provide these tuition scholarships for post-secondary education. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by providing \$10 million for these post-secondary tuition scholarships. Key is the largest corporate donor to this fund. In addition, they provided board support. One of their executives served on the national board of Say Yes and provided local leadership in fundraising. Another Key executive has served on the Say Yes Scholarship Board since 2021. This Board reviews Say Yes policies and tracks the progress of the scholarship program.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to provide a post-secondary education to many students who would not be able to attend without these scholarships. Most of our scholarship students are the first in their families to attend college. Over 90% of our students live in poverty and would not be able to afford a college education without this program. This school year there are 1300 Say Yes Scholars across the state

and across the country. Although the program is just three years old, we have already had 90 graduates from four-year, two year and certificate programs.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at 440-773-7649 or email me at ddowning@sayyescleveland.org.

Sincerely,

Diane Downing,

Executive Director, Say Yes Cleveland



South Euclid

UNITED CHURCH OF CHRIST

Rev. Courtney Clayton Jenkins, Senior Pastor and Teacher

4217 Bluestone Road
South Euclid, OH 44121
216.791.5200

www.SouthEuclidUCC.org

February 27, 2023

[REDACTED] OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear [REDACTED]

I am very pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

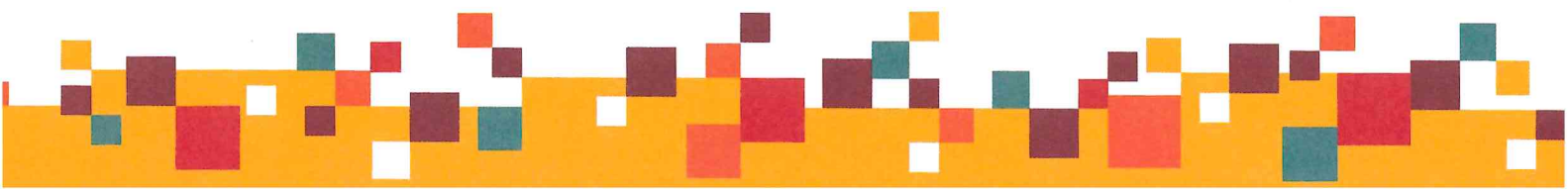
South Euclid United Church of Christ (SEUCC) is a local religious institution located in a low to moderate income area which, in addition to our religious purpose, has a strong focus on strengthening our community. We have the following programs at our church to help to make our community stronger and safer:

1. A Food Pantry serving over 200 local families helping to alleviate food insecurity in our community.
2. A Special Needs Adult Day Care and vocational guidance and training program.
3. A mentorship program for high school young adults in partnership with the local High School.
4. We annually provide grants to our community helping to keep people in their homes (housing insecurity), provide scholarships, and enhance minority entrepreneurship in our community.

These programs are vital to our community. Key has been a long-time supporter of the in providing top tier banking services to our smaller business. As a matter of fact, Key has allowed for these vital community programs to continue by administering the Paycheck Protection Program (PPP) for the church during the dire days of the pandemic. While it was a Federal Program, KeyBank fully supported a small local church in making sure that we, and our vital programs, would survive during those difficult days. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through their philanthropy and banking support and expertise.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our low to moderate income community by providing a strong banking relationship to a smaller organization up to and including the administration of the PPP Loan program of the Federal Government, which assured the survival of the church in the difficult days of the pandemic.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to survive as a church via their administration of the PPP Program loan for the church.



We look forward to continuing and even expanding our partnership with KeyBank as we work together to meet the needs of our community.

If you need to contact the church, please call me at (216) 658-4260 or via email at mheaden@southeucliducc.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'MEH', with a stylized flourish at the end.

Michael E. Headen

Chief Financial Officer

A handwritten signature in black ink, reading 'Courtney Clayton Jenkins' in a cursive script.

Courtney Clayton Jenkins

Senior Pastor and Teacher

March 15, 2023

Stanley Poszywak | OCC Examiner-in-Charge
Large Bank Supervision | Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Re: KeyBank's CRA Exam

Dear Mr. Poszywak:

I am pleased to share these comments regarding KeyBank's Community Reinvestment Act Examination conducted by the Office of the Comptroller of the Currency for 2019 through 2021.

The mission of Cleveland Clinic is threefold: caring for life, researching for health and educating those who serve. Among our top priorities is taking care of the communities that we call home. To this end, the KeyBank Foundation has partnered with us across several impactful initiatives, including the following:

- By eliminating financial barriers for aspiring physicians, the **KeyBank Minority Medical Student Scholarship** enables promising students to pursue a medical career. With a philanthropic commitment from KeyBank, the Cleveland Clinic Lerner College of Medicine matriculates minority students, leveraging scholarship opportunities to actively recruit a diverse student body prepared to lead the future of healthcare. Three scholarships are awarded annually.
- Funding from KeyBank allowed Cleveland Clinic to host the **Minority Men's Health Fair** and the **Celebrating Sisterhood Summit**, which provided free health screenings and health education for hundreds of members of underserved communities.
- Ongoing support from KeyBank helps to sustain Cleveland Clinic's **Stephanie Tubbs Jones Health Center** in East Cleveland, which delivers comprehensive medical care and support services (e.g., health education; transportation to appointments; access to healthy food) for underserved patients.
- Funding from KeyBank was matched by the former Chair and CEO of KeyCorp. [REDACTED] to the Cleveland Clinic's **ASPIRE** program provides a pathway to nursing careers for high school students from economically marginalized communities, while simultaneously helping to address pressing workforce needs for more nurses in Northeast Ohio and across the nation.
<https://www.cleveland.com/healthfit/2023/02/the-pipeline-is-real-aspire-nurse-scholars-program-helps-diversify-nursing-ranks-1st-graduates-at-cleveland-clinic.html?outputType=amp>
- In addition, KeyBank has been an incredible corporate sponsor for **VeloSano**, our annual **Bike to Cure** event, that raises funds for cancer research. Their sponsorship, is invaluable to engage their employees and raise awareness for the pressing need for research funding and the importance of cancer screenings in the community.

It should also be noted that since 2019, Cleveland Clinic's Board of Trustees and Board of Directors have been led by [REDACTED], former Chair and CEO of KeyCorp. [REDACTED]'s tenure saw our nonprofit health system rise to the unprecedented challenges of the COVID-19 pandemic while continuing to grow, regionally as well as internationally. [REDACTED], retired Chair and CEO of the KeyBank Foundation, also serves on Cleveland Clinic's Board of Trustees. Their volunteer leadership and the leadership at KeyBank and KeyBank Foundation have continued to co-invest with the Clinic's commitment to support the communities which we serve.

Cleveland Clinic looks forward to continuing to work with KeyBank to meet the needs of our communities. If you have any questions, please call me at 216.445.8695 or email me at kalafal@ccf.org.



Sincerely,
Lara Kalafatis



February 28, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

The Cleveland Foundation is the world's first community foundation founded in Cleveland, Ohio in 1914. Over the past 109 years, it has become one of the largest foundations of its kind with assets over \$2.8 billion and annual grants of more than \$120 million. In partnership with its donors and across its tri-county footprint – including Cuyahoga, Lake, and Geauga counties – the Cleveland Foundation seeks to improve the lives of residents through supporting arts & culture, economic development, education, the environment, health & human services, neighborhood revitalization, youth, and workforce development.

KeyBank has been an engaged partner and has supported the Cleveland Foundation by working together to address key community challenges and opportunities. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community in multiple ways in recent years. Since before 2019 and continuing through today, it has contributed to the leadership and support of Say Yes to Education – a 25-year wrap-around services and postsecondary scholarship program serving the students of Cleveland Metropolitan School District with the aim to increase the graduation rates and bolster the community's future workforce needs. KeyBank continues to play an important role and provide leadership on the fundraising committee, scholarship board, and as a community advocate for the program.

Additionally, KeyBank has been a wonderful partner in supporting the foundation's work in Midtown, including assisting with the financing of the foundation's new Headquarters building and its second building, the Midtown Collaboration Center. Located on the east side of Cleveland, Midtown is a historically redlined neighborhood that has witnessed significant disinvestment over the past many decades. With its move to the neighborhood, the foundation is engaged with various partners to support equitable redevelopment, ensuring that the future of the neighborhood incorporates residents' voice and vision.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please email me at r-richard@clevefdn.org.

Respectfully,

A handwritten signature in blue ink that reads "Ronald B. Richard". The signature is written in a cursive style with a large initial 'R'.

Ronald B. Richard
President & CEO



1228 Euclid Ave., Suite 400
Cleveland, Ohio 44115
Phone (216) 475-8900
www.nrpgroup.com

3/14/2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

The NRP Group is a vertically integrated developer, owner, builder, and manager of best-in-class multifamily housing. Since its founding in 1994, NRP has developed more than 50,000 apartment homes, and currently manages over 26,000 residential units.

KeyBank has been an engaged partner and has supported NRP's mission to continue to create exceptional rental communities for individuals and families, regardless of income. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by providing various financing for 1,917 apartment homes across NRP's footprint. KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us provide affordable housing with two apartment communities in their backyard in the Broadway- Slavic Village and Clark-Fulton neighborhoods.

We believe that the future of Affordable Housing is Healthy Housing, a concept whereby healthcare systems and nonprofits partner with developers to leverage safe, high quality affordable housing as a platform for improving social determinants of health such as food and nutrition, workforce training, social services, and more. These institutions and social service providers have begun to embrace the proven efficacy of healing the patient by healing the neighborhoods in which they live.

The NRP Group is very proud to be a pioneer in forming Healthy Housing partnerships with healthcare providers and nonprofits to help create the future of affordable housing. Here are a few examples where KeyBank provided financing:

[Via Sana, Cleveland, OH](#)

- Apartment Homes: 72
- Product Type: 9% LIHTC
- AMI Range: 30 - 60% AMI
- Partners: The MetroHealth System, Cuyahoga Community College

- **Healthy Housing Features:** Vía Sana is the first \$15 million investment in The MetroHealth System's \$60 million mixed-use development. In addition to 72-affordable units, Vía Sana will also house the MetroHealth Opportunity Center that will be operated by a partnership between Cuyahoga Community College (Tri-C®) and MetroHealth's Institute for H.O.P.E offering job training, financial and digital literacy training, and access to Tri-C classes.

[5115 at The Rising, Cleveland, OH](#)

- Apartment Homes: 88
- Product Type: 9% LIHTC
- AMI Range: 30 - 60% AMI
- Partners: University Settlement, Cuyahoga Community College
- **Healthy Housing Features:** Developed in partnership with University Settlement, a non-profit organization serving over 12,000 residents of the Slavic Village neighborhood, 5115 at The Rising will offer a 20,000 commercial space to serve as the organization's new headquarters. It features a vast array of social support services including food centers and community meals, after-school programming, family support services and senior citizen engagement. Cuyahoga Community College will partner with University Settlement to offer a wide range of life-enhancing classes in the space.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at **440-610-4064** or email me at **kloos@nrpgroup.com**.



Name: Noam Magence

Title: Secretary of The NRP Group LLC



Towards Employment

Empowering individuals to achieve and maintain self-sufficiency through employment.

Office: (216) 696-5750
Fax: (216) 696-5119
TowardsEmployment.org

BOARD OF DIRECTORS

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Tiffany Short
Shenise Johnson Thomas
Melanie L. Webber

President & CEO
Jill Rizika

March 9, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Towards Employment works to help people find family-sustaining jobs, navigate life's obstacles, and secure long-term careers. We use a proven WorkAdvance Model to provide wrap-around services and extended job coaching to achieve a \$2 ROI for every \$1 spent.

KeyBank has been an engaged partner and for over 15 years has supported **Towards Employment** in our mission to empower people to achieve and maintain self-sufficiency through employment. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank hworked with us to meet the needs of our community by providing initial funding to incorporate the WorkAdvance model into core programming. Excellent and strategic board leadership from KeyBank helped us navigate the pandemic, and we have benefited from Neighbor Make a Difference Day with projects that ranged from mock interviewing, conducting financial literacy workshops to painting the participant lunchroom since it started in Cleveland in the early 1990's.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and embed economic mobility into our organization.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at **(216) 696-5750** or email me at jrizika@towardsemployment.org

Jill Rizika
President and CEO

Towards Employment
Mailing Address (Checks)
P.O. Box 6687
Cleveland, OH 44101

Towards Employment
Headquarters
3301 St. Clair Ave.
Cleveland, OH 44114

Young Adult Resource Center
OMJ | CC
1910 Carnegie Ave.
Cleveland, OH 44115

TE Industry Partnerships
MAGNET
1800 E 63rd St.
Cleveland, OH 44103



2930 Prospect Ave.
E. Cleveland Ohio 44115

March 10, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

UBIZ Venture Capital (UVC) works to providing low cost and flexible capital to minority small businesses.

We are proud to call KeyBank our community partner. KeyBank has been responsive to community needs. KeyBank has been an engaged partner and has supported **UBIZ Venture Capital** in our goal to provide underserved or disadvantaged small businesses an opportunity to compete and grow in their industry. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by Providing funding to assist with our loans and programs which is helping businesses to expand and preserve their legacy. We also encourage financial education and provide opportunities for businesses to learn how to become bankable.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to KeyBank has supported our mission since inception by generously providing financial support to cover some of our operational costs. KeyBank has also provided its executives to serve on our board of directors and loan committee on a voluntary basis with their expertise in financial services industry.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at **440-212-2567** or email me at **mobi@ulcleveland.org**.

A handwritten signature in black ink that reads "Michael Obi".

Michael Obi

President and CEO

UBIZ Venture Capital

2930 Prospect Ave E, Cleveland, OH 44115
216-539-1163



March 7, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email: CommunityAffairs@occ.treas.gov and cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

United Way of Greater Cleveland connects people, dollars, and services to confront local poverty, disrupt its cycle, and help people overcome barriers to economic mobility. United Way of Greater Cleveland directly assists more than 120,000 people annually through United Way 211, a free and confidential service that connects all people in need to appropriate health and social service agencies across several Ohio counties. The greatest needs are consistently for food insecurity, housing instability, and utilities assistance, all indicators of people living in or near poverty.

Cleveland's poverty rate remains among the highest of all major cities in the country. United Way of Greater Cleveland, therefore, invests strategically in nonprofit organizations able to meet the immediate needs of low- and moderate-income residents and implement innovative anti-poverty strategies. The support focuses on:

- economic mobility to help families thrive via early childhood programs that prepare children with social-emotional, behavioral, cognitive, and/or language risks for kindergarten and teen and adult workforce development and job placement;
- housing stability to provide people facing homelessness with emergency shelter, homelessness prevention services, and case management services; and
- health pathways to promote the health and well-being of low-income senior adults by providing access to nutritious food and socialization.

United Way also partners with area nonprofit organizations, healthcare providers, government agencies, and other stakeholders to implement solutions to multi-faceted root causes of poverty. These initiatives include ensuring single parents have the post-secondary education needed for employment by providing wraparound housing, childcare, and financial education support; legally representing families facing eviction for free in Housing Court; delivering medically tailored meals to seniors with chronic health conditions; and supporting low-income families facing eviction/foreclosure with emergency financial aid for housing expenses paid to landlords.

As an engaged partner, KeyBank has supported United Way of Greater Cleveland's mission to mobilize people and resources by creating solutions that improve lives and our community. This support demonstrates KeyBank's commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community through its generous philanthropic support of United Way 211 (formerly 2-1-1 HelpLink) and board participation and advocacy of United Way's work by [REDACTED].

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and enabled us to respond quickly and connect people to service providers able to address their immediate needs. This was especially true during the COVID pandemic when United Way 211 received thousands of dire calls for help locating open food pantries and finding assistance for rent payments in arrears.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at 216.436.2015 or email me at sjordan@unitedwaycleveland.org.

Sincerely,



Sharon Sobol Jordan
President and CEO



March 1, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

University Hospitals has been on a mission to heal, teach and discover. As an academic medical center and community hospital network, we've expanded across Northeast Ohio to deliver what matters most to our patients: personalized, compassionate, affordable care that is close to home.

Over the last decade, we have invested \$3.5 billion in the community and we must do more. Narrowing the health care disparity gap improves a community's quality of life and we've made this a major component of our strategic plan. Continuing to invest in food security, well-being and safety, maternal and child health and workforce development are a few examples of how University Hospitals contributes to the health and welfare of Northeast Ohioans.

KeyBank has been an engaged partner and continues to support University Hospitals and our programs that advance health equity. This support demonstrates KeyBank's commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by pledging \$1 million over five years to support the Rainbow Connects Program. A program designed to identify and address families' basic social needs, like food, clothing, diapers, utilities and furniture, to help them stay healthy. KeyBank continues to support cancer research by sponsoring our premier event to benefit UH Seidman Cancer Center. In addition to philanthropic support, [REDACTED], CEO and President KeyCorp, has been on our Board of Directors since 2015.

KeyBank's partnership and engagement have allowed us to be responsive to community needs and help us to expand programs that promote health equity in our region.

We look forward to continuing our partnership with KeyBank to meet the needs of our community.

If you have questions, please contact me at Sherri.Bishop@uhhospitals.org.

Sincerely,

A handwritten signature in black ink that reads 'Sherri A. Bishop'.

Sherri Bishop
Chief Development Officer



March 7, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

West Park Kamm's Neighborhood Development works to develop a vibrant, livable, and multi-generational neighborhood, known for its welcoming people, thriving businesses, and connection to the environment. WPKND addresses the challenges of the neighborhood through housing rehab, senior home repair, community engagement, neighborhood events, urban planning, pilot projects, small business support and development, real estate development, and neighborhood revitalization.

KeyBank encourages its teammates to provide expertise through volunteerism and board service. Their teammate has supported **West Park Kamm's Neighborhood Development to cultivate a neighborhood where the diverse needs of its people are met through community-building, stewardship, and development initiatives. by engaging as an active board member and volunteer.** This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by **supporting bank employees in leadership roles on our Board of Directors and providing matching dollars to their contributions. Key Bank branch employees have also completed volunteers days to do neighborhood clean-ups.**

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to **develop strong organizational leadership to ensure that our mission is fulfilled.**

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at **216-252-6559 x 1100** or email me at **rosemary@westparkkamms.org**

Rosemary Mudry
Executive Director



February 27, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Youth Opportunities Unlimited is a nonprofit workforce development organization that serves teens and young adults, ages 14-24, living in under-resourced areas in Northeast Ohio. Y.O.U.'s programs and services are focused on ensuring these individuals are ready to pursue a path to economic self-sufficiency through mentoring, employability skills training, industry-based credential training, career exploration, jobs, and internships.

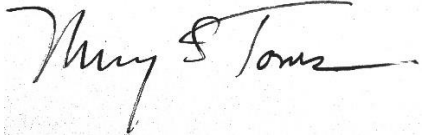
KeyBank encourages its teammates to provide expertise through volunteerism and board service. Their teammate has supported Youth Opportunities Unlimited to prepare teens and young adults to become economically self-sufficient contributors to building Northeast Ohio's educated, skilled, and inclusive workforce by engaging as an active board member and volunteer. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by providing philanthropic support for programs, participating on the board of directors and committees, and volunteering in the classroom to support youth learning.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to continue providing workforce development education in the schools and to innovate programming through the expertise our KeyBank board member provides.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at 202.674.7717 or email me at mtoms@youcle.org.

A handwritten signature in black ink that reads "Missy S. Toms". The signature is fluid and cursive, with a long horizontal stroke at the end.

Missy S. Toms
VP, Development & Communications

March 6, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

The Ursuline Sisters of Cleveland have served the population of Greater Cleveland faithfully since 1850. Since their arrival in Cleveland, the Ursuline Sisters have established schools for children of all ages, with a special emphasis on poor and underserved communities. Through their ministry, they have fostered a love of lifelong learning for generations of local students, all while cultivating a rich heritage of compassionate service. Additionally, the mission of the Ursuline Sisters of Cleveland seeks to transform lives through contemplation, justice, and compassion. To that end, they work tirelessly for the good of thousands of individuals in local schools, parishes, hospitals, hospice facilities, nursing homes, shelters, and more. The congregation's mission places special emphasis on serving families, women, the economically poor, and the powerless. Throughout the years, the sisters have expanded their ministries beyond classroom teaching to include justice and peace advocacy, comforting the sick and dying, pastoral ministry, and more. Ursuline Sisters currently serve with non-profit entities; government agencies; social service providers; educational institutions; healthcare, hospice and retirement facilities; and Catholic parishes and communities throughout Northeast Ohio.

KeyBank encourages its teammates to provide expertise through volunteerism and board service. Your teammate has supported The Ursuline Sisters of Cleveland by helping the sisters to fulfill their mission in the community by engaging as an active board member and volunteer. The volunteer has served on one of our advisory boards as well as on a subcommittee of that board, participating in active fundraising efforts and supporting the sisters through annual philanthropic donations of her own. This support demonstrates KeyBank's commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community. As mentioned above, your teammate has served as the chairperson of our Development Committee and a member of the subcommittee that helps organize donations from local business vendors and community members for our annual basket raffle and gala. As Development Chair, this teammate has helped spearhead new initiatives and collaborations with the Ursuline's Marketing Committee and collaborated with a diverse membership to help encourage the philanthropic support that allows the sisters to continue their ministry within the community.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to continue our mission within the community by keeping younger members engaged with the sisters and continually offering fresh, innovative ideas while serving the sisters with generosity, good will, and dedication. We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at (440) 229-5600 ext. 5634 or email me at cjohnson@ursulinesisters.org.

Cindy Johnson
The Ursuline Sisters of Cleveland

Sue Angell
Associate Director of Development
Phone: (440) 229-5603

Ursuline Sisters of Cleveland
6085 Parkland Blvd. #175
Mayfield Hts., OH 44124
440-229-5620
www.ursulinesisters.org

Adelphi Bank.

March 3, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

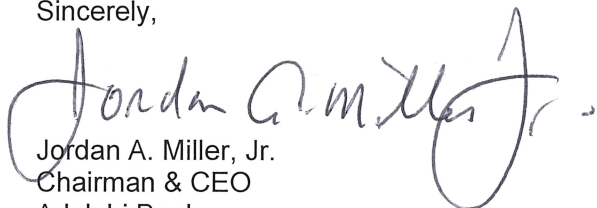
Adelphi Bank is an Ohio based Minority Depository Institution (MDI) that was approved by the FDIC and Ohio Department of Financial Institutions (ODFI) on January 18, 2023. Adelphi Bank is the only Black MDI in Ohio and the first Black MDI formed in over 20 years in the United States. We began organizing the bank in late 2020 and KeyBank has been a critical partner and supporter through its donation, equity investment, and technical support. KeyBank's donation and investment allowed us to cover pre-opening expenses in order to gain the approval of both the FDIC and ODFI. However, its technical support and guidance has also been critical to us gaining approval.

Adelphi Bank is located in a historically disadvantaged community and our focus is to improve the lives of the underbanked and unbanked citizens in this neighborhood and in similar communities in Franklin County. We will do this by providing much needed banking services targeting home ownership, small business lending, and financial education. KeyBank's support and ongoing partnership will be critical in helping us meet the needs of this underserved community. They have demonstrated a high level of commitment beyond dollars invested by being a trusted partner in all aspects of our business.

We look forward to a long-term relationship that will include ongoing technical support and loan participations.

Please feel free to contact me with any questions about the mission of Adelphi Bank or KeyBank's support of our mission.

Sincerely,



Jordan A. Miller, Jr.
Chairman & CEO
Adelphi Bank
Jordan.miller@adelphibank.com
614-830-9704



February 27, 2023

██████████ OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear ██████████

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

COHHIO advocates for effective state and federal policies to expand access to affordable housing to end homelessness in Ohio. Our state has a severe shortage of rental homes that are available to the lowest income households, a situation that puts hundreds of thousands of extremely low-income Ohioans at risk of homelessness.

KeyBank has been an engaged partner and has supported COHHIO's advocacy efforts for many years. KeyBank regularly sponsors our annual conference, which provides a significant source of funding for our advocacy program. KeyBank also donated generously to our Pandemic Emergency Fund, which helped local homeless shelters throughout Ohio meet the dire need for PPE, food, staffing, and other supplies during the early days of the pandemic.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped COHHIO better represent the needs of extremely low income Ohioans. We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at 937.206.1480 or email me at amyriegel@cohhio.org.

Amy Riegel
Executive Director



175 South Third Street, Suite 580, Columbus, Ohio 43215
Ph: 614.280.1984 Fax: 614.463.1060
www.cohhio.org



homeport

March 1, 2023

[REDACTED] OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear [REDACTED]

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Homeport works to providing greater security, opportunity and dignity to thousands of low to moderate income individuals and families by building quality, affordable homes, primarily financed with private investment leveraged by Federal tax credits.

KeyBank has been an engaged partner and has supported **Homeport to create strong communities by developing quality, affordable homes on the cornerstone of dignity, security, and opportunity**. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by **supporting our Housing Advisory Services (HAS), an evidenced-based education and counseling program for low- and moderate-income individuals and families in managing finances, building wealth, and purchasing a first home. HAS annually benefits more than 1,200 Central Ohio residents from Delaware, Fairfield, Franklin, Knox, Madison, Pickaway and Union counties. The target demographic is the Low-to-Moderate Income population who are most in need of Homebuyer Readiness, Homebuyer Education (HBE), and Financial Fitness workshops, and individualized Homebuyer Counseling.**

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to **provide multiple services focused on improving the economic empowerment for all of Central Ohio regardless of race, gender, sexual orientation or socio-economic standing.**

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community. If you have questions, please contact me at 614-545-4860 or email me at jessica.byassee@homeportohio.org.

Sincerely,

Jessica Byassee
Grant Manager



homeport

February 28, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Homeport's mission to create strong communities by developing quality, affordable homes as a cornerstone of dignity, security, and opportunity is bolstered by the support it receives from partners like KeyBank. Every night over 7,000 people sleep in Homeport communities across Central Ohio. Housing where we provide not only affordable rents but access to necessary service connections. Affordable housing is challenging work and for non-profit, mission driven organizations partnership with our financial institutions is key to driving impact and moving the needle on revitalizing underserved and underinvested neighborhoods.

Recently, our partners at KeyBank have been instrumental in preserving an existing 144-unit affordable community for families through refinancing and negotiation for a new equity investment. This project is critical in a time when many apartments, including formerly affordable apartments, are being transitioned to market rate and seeing significant rent increases. It is important that KeyBank stays engaged in a growing community like Columbus to preserve affordability, advance homeownership, and support the place-based initiatives needed to build and sustain strong communities. Through this type of financing support and philanthropic investments in our Housing Advisory work, KeyBank has demonstrated its commitment to serving low- and moderate-income neighborhoods and individuals. The support of KeyBank also allows us to provide housing counseling and financial education services advancing homeownership, savings, improved credit positions, and empowered consumers in the marketplace.



homeport

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at (614) 946-2489 or email me at leah.evans@homeportohio.org.

Sincerely,

A handwritten signature in black ink that reads "Leah F. Evans". The signature is fluid and cursive.

Leah F. Evans
President and CEO





www.lifecarealliance.org

Nourishing The Human Spirit.



1699 West Mound Street
Columbus, Ohio 43223
Phone: 614-278-3130
Facsimile: 614-278-3143

March 1, 2023

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IMPACT SAFETY
COMMUNITY DINING CENTERS
COMMUNITY WELLNESS
CORPORATE WELLNESS PROGRAMS
CENTRAL OHIO DIABETES ASSOCIATION
DIABETES DAYTON
COLUMBUS CANCER CLINIC
PROJECT OPENHAND-COLUMBUS
MEALS-FOR-KIDS
FROZEN MEALS
L.A. CATERING

[Redacted] OCC Examiner-in-Charge

National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear [Redacted]

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 – 2021.

LifeCare Alliance works to keep over 30,000 seniors and individuals with medical challenges or disabilities in their own homes each year – through a comprehensive array of nutrition, health, and support services. This not only is where our clients want to remain as they age or navigate illness, but it also brings housing stability to hundreds of central Ohio neighborhoods as we help to provide food and supplies to help our clients maintain independence and dignity.

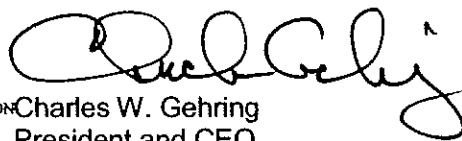
KeyBank has been an engaged partner, supporting LifeCare Alliance for many years, through Board services, volunteering, and financial support. KeyBank staff deliver Meals-on-Wheels regularly, and the company has supported our basic needs programming with grant funding. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

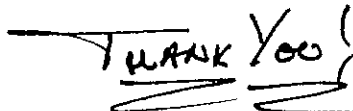
From 2019 – 2021, KeyBank has worked with us to meet the needs of our community by delivering Meals-on-Wheels weekly, and providing critical funding in both 2020 (\$15,000) and 2021 (\$10,000), as covid need increased our weekly meal delivery numbers by 68%.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to meet the sustained increases in need for our services.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community. If you have questions, please contact me at 614-437-2801 or email me at cgehring@lifecarealliance.org.

Sincerely,


Charles W. Gehring
President and CEO





You invest, families flourish.



February 28, 2023

██████████ OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear ██████████

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Move to PROSPER'S mission is to improve life outcomes for children and their parents by offering relocation opportunities that create affordable housing in safe neighborhoods that offer healthy and stable housing that is close to everyday conveniences and job opportunities; housing stability that reduces stress and supports improved health; schools that are higher-resourced and provide children with a better learning environment; and coaching that provides tools for being financially stable and transforming lives. KeyBank has been an engaged partner and has supported Move to PROSPER as we help families reach economic stability. This support demonstrates its commitment to serving low- and moderate-income neighbors through philanthropy and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by offering substantial philanthropic support, a board member and volunteers who help us expand our network in Central Ohio.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to expand our number of families served from a 10-family pilot, developed with the expertise of and evaluated by The Ohio State University, to 100 families who will enter the program from 2022-2025.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at 614-352-8889 or email me at amy.klaben@movetoprosper.org.

Sincerely,

Amy Klaben, Move to PROSPER President & CEO

Kim Campbell
Tamella Fair
Carl Faller
Lori Ann Feibel, Chair
Brendan Foley
Kate Giller
Steve Heiser
Keith Jones
Amy Klaben, President
Rachel Kleit
Debbie Manos-
McHenry
Bonnie Milenthal
Ernie Sullivan
██████████
Se-Se Yennes



March 1, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021. Ohio Capital Corporation for Housing ("OCCH") works to advance the preservation, production, and management of affordable housing through collaborative partnership and innovative thought leadership. We envision a world where stable, affordable housing is available to all, and the residents and communities we serve feel supported and empowered to grow and thrive. KeyBank has been an engaged partner and has supported OCCH to further advance our mission of supporting affordable housing throughout Ohio and surrounding states. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community through participation in our Equity Funds as well as our loan funds through our affiliate CDFI. In addition, through its philanthropic efforts, KeyBank is the founding sponsor of OCCH's Affordable Housing Training Academy ("AHTA") which provides nationwide, affordable web-based training in support of management companies in the affordable industry. KeyBank has also been supportive in providing financial education to OCCH staff on a regular basis.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to meet the affordable housing needs within Ohio, particularly in rural areas where capital is difficult to come by. Their willingness to be innovative and thoughtful has been a tremendous value to OCCH and the broader Ohio community.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at **614-545-7823** or email me at jseamons@occh.org.

Jennifer Seamons

Executive Vice President
Ohio Capital Corporation for Housing



March 1, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

My name is David Harrison and I serve as the Senior Director of the Office of Diversity and Inclusion Student Services and Corporate and Community Outreach within the Fisher College of Business at The Ohio State University. I have over 36 years of service in higher education administration and student affairs at OSU. With our mission in mind, I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

At Fisher, we embrace diversity, equity and inclusion and recognize their value in shaping ideas within our community of learning and beyond. Ours is an environment reflective of business, where recognizing and respecting our differences can spark innovative ideas, better processes, and positive change and where students and faculty alike are empowered to share viewpoints, challenge assumptions and debate ideas. We embrace diversity and seek to promote opportunities for excellence to be achieved by all. The goals of the Max M. Fisher College of Business Office of Diversity and Inclusion Student Services and Corporate and Community Outreach are to provide quality student counseling, scholarship opportunities, career support services, and tutoring services which meet the needs of diverse undergraduate and graduate students enrolled or intending to enroll in the college. In addition, the office provides services and support internally to campus departments and organizations; and externally to corporations, companies, and agencies which seek to help all students succeed academically, financially, and socially. [Diversity & Inclusion | Fisher College of Business \(osu.edu\)](#)

KeyBank has been an engaged partner and has supported our **Annual MBA Minority Student Case Competition and our Annual Undergraduate Minority Student Leadership and Creativity Symposium**. In **2005**, KeyBank and Fisher College of Business established one of the nation's most recognized minority MBA student case competitions. The annual competition, directed and administered by the Fisher College of Business Office of Diversity and Inclusion Student Services, allows competing teams to hone their business acumen and team-building skills while learning from KeyBank executives. The competition has evolved to represent **25 to 30 teams** each year from the nation's leading institutions. Including this year, **19 case competitions** have been held, involving **89 selected universities** and over **1,049 MBA and business graduate students** from across the United States. The most recent case competition took place February 24-26, 2023. [KeyBank Case Competition | Fisher College of Business \(osu.edu\)](#)

This nationally recognized support demonstrates its commitment to serving the ethically under-represented, first generation, economically disenfranchised, veterans, disabled, and/or low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism. From 2019 to 2021, KeyBank collaborated with us to meet the needs of our graduate and undergraduate student communities. In fact, from 2020-2021, KeyBank joined us as we continued the programs virtually (online) for two years because travel was halted due to the COVID-19 Pandemic.

KeyBank's ongoing commitment and actions to serve the needs of marginalized, economically disadvantaged, and/or low- and moderate-income communities are clear. Key's financial support, partnership and civic engagement has allowed us to be responsive to community needs and helped our university serve the community. The Ohio State University Fisher College of Business was pleased to partner with KeyBank on this **19th Annual Minority MBA Case Competition**. As noted above, KeyBank and Fisher College of Business have a long-standing partnership that began with the establishment of the first minority MBA case competition in 2005.

But our partnership with Key is much deeper. In addition to the nationally recognized case competition, we also host an annual leadership and creativity undergraduate minority student symposium in Columbus that is also funded by the KeyBank Foundation. That program, which began in **2008**, has held **15 annual programs** and has benefitted over **660 talented undergraduate minority students** representing **over 94 universities** from all around the United States. The most recent undergraduate leadership and creativity symposium took place November 17-20, 2022. [KeyBank Undergraduate Symposium | Fisher College of Business \(osu.edu\)](#)

Recent Highlights of our Partnership with KeyBank:

- **2023 KeyBank Leadership Symposium broadens students' business perspectives**
[KeyBank Leadership Symposium broadens students' business perspectives | Fisher College of Business \(osu.edu\)](#)
- **2022 KeyBank and Fisher's Continuing Commitment to Diversity, Equity, and Inclusion Programs**
<https://fisher.osu.edu/news/a-continuing-commitment-diversity-equity-and-inclusion-programs>
- **2019 KeyBank and Fisher College of Business Leadership Symposium Unites our Country's Best and Brightest Minds**
<https://fisher.osu.edu/news/shaping-undergraduate-leadership-and-creativity-through-partnerships>
- **2019 KeyBank extends diversity commitment with an additional \$1M (\$211K per year X 5 years)**
<https://fisher.osu.edu/news/keybanks-financial-support-fisher-students-tops-3-million>

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our graduate and undergraduate student community. If you have questions, please contact me at 614-292-1017 email me at Harrison.3@osu.edu.

With sincere thanks,



David E. Harrison
Senior Director

<https://fisher.osu.edu/people/harrison.3>

March 5, 2023

██████████ OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear ██████████

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Per Scholas advances economic mobility by providing high quality skills and professional development training to individuals traditionally underrepresented in the tech field and connecting graduates to dynamic employers in need of talent. KeyBank supported Per Scholas from 2019 - 2021, enabling us to train 371 low and moderate income learners in the Columbus, OH region.

From 2019 to 2021, KeyBank worked with Per Scholas to meet the needs of our community by contributing philanthropic support for our technical and professional development training. KeyBank's investment of 3 grants totaling \$120,000 during this time were directed toward our general programming, COVID-19 relief, and the Tech Women of Color initiative, helping hundreds of individuals train for technology careers. Additionally, Per Scholas received generous support from KeyBank's Business, Boost & Build program powered by JumpStart, which enabled Per Scholas to train 371 learners, launching their careers in technology and increase their earnings by 9%.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to launch the IT careers of over 300 graduates and create over \$16M in new wages. Based on our projections, the Columbus campus will enroll 240 learners in 2023, helping launch the careers and change the lives of hundreds of individuals. We are grateful for KeyBank's support in this period and hope to continue to work with the bank in the future.

Columbus, OH is experiencing tremendous growth and development as more tech-based companies begin to call the City home. By providing rigorous technical skills and professional development training at no cost to learners and connecting them with local and national businesses, Per Scholas is able to open the doors of opportunity for individuals outside of traditional candidate pools.

KeyBank has been an engaged partner and has supported **Per Scholas to advance economic equity through rigorous training for tech careers, and to connect skilled talent to leading businesses.**

If you have questions, please contact me at [insert phone number] or email me at Jfowlerhoward@persholas.org.

Jenn Fowler Howard

Managing Director, Per Scholas Columbus



March 6, 2023

[REDACTED] OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear [REDACTED]

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Youth Over Us, Inc. serves at least 84 youth aged 18-24. We offer GED prep/High School Diploma prep, Leadership Development, Financial Wellness, Health & Wellness, Construction (Carpentry and Electrical), Phlebotomy, EKG, and STNA. This will include the following: we need a permanent location to house our organizational and programmatic efforts. We'd love to expand our reach to serve 500 youth and young adults per year plus year. This will include more qualified staffing, facilities, resources, and more for such an increase.

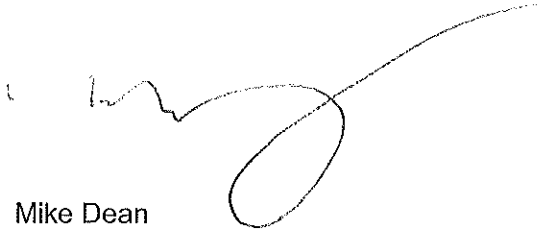
Therefore, as we expand our effort in the areas above, securing a loan for purchasing our space will be critical for our continued growth efforts. KeyBank has been an engaged partner and has supported Youth Over Us, Inc. Our mission is to provide support and training for the social, educational, and economic development of disadvantaged youth and support underprivileged families. This support demonstrates its commitment to serving low-and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by support in our education and training programs. For example, KeyBank's support assisted in providing student bus passes, tools, books, software, computers, and uniforms for construction and healthcare students.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and have impacted us in many ways; due to KeyBank's support, we have a 95% completion rate, over 75% of our participants have increased at least to grade levels in literacy and numeracy, 73% of our students are placed in a job or post-secondary education (with average earning of 17 dollars per hour) and, over 75% in certificate attainment in healthcare, construction, and GED.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at **614.893.9686** or email me at mdean@youthbuildfc.org.

A handwritten signature in black ink, appearing to read 'Mike Dean', with a large, sweeping flourish extending to the right.

Mike Dean

CEO

March 1, 2023

██████████ OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear ██████████

We are pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021. The Dayton Area Chamber of Commerce Education and Public Improvement Foundation Minority Business Partnership (MBP) strategically focuses on two specific areas for building inclusion: capacity building and creating connections in our region. The outcomes of these two areas are the source for creating a tangible return on investment to the community.

KeyBank has been an engaged partner since this initiative joined the Chamber in 2010 and has supported the expansion of the Minority Business Partnership's supplier diversity framework. From 2019 to 2021, KeyBank's support empowered us to meet the needs of our business community by providing resources via the KeyBank Business Boost & Build (KBBB) initiative. This small business accelerator and workforce development initiative provided resources and best practices that advanced our three pillars: access to contracts, access to capital and access to coaching coupled with connecting unemployed & underemployed individuals to employment opportunities.

As a result of the KBBB funding during 2019 through 2021, MBP and our small business collaboration launched programs that continue to deliver valuable support for our regional economy today:

- **Ecosystem Capacity Building:** Prior to KBBB, our ecosystem and support for minority-, women- and veteran-owned businesses was fragmented. KBBB provided the funding and guidance to build a strong foundation amongst resource providers needed to accelerate the growth of businesses in our region. Today, our collaboration is stronger than ever and continuing to ensure the needs of underserved businesses are at the heart of our programming.
- **Bankers Roundtable:** In 2019, MBP launched the Bankers Roundtable forum connecting minority and women-owned businesses to local and regional financial institutions. This luncheon series forum is comprised of approximately 20 lenders and investors, including banks, CDFI's and public sector capital programs. Bankers Roundtable proved to be extremely important in 2020 as we were impacted by the pandemic. These banking relationships established with the diverse businesses provided connections for Payroll Protection Plan (PPP) access for companies that would not have traditionally be included in the initial rounds of the program. MBP works with companies that don't have strong relationships with financial institutions and coaches them on their business pitch deck (which includes financials) enabling the financial institutions and diverse businesses to establish business banking relationships and leverage opportunities. Eighteen (18) companies have formally presented their pitch decks during the Bankers Roundtable forums. An additional, sixty-one companies were supported through the Bankers Roundtable related efforts (PPP support, EIDL, access to other capital sources – lines of credit, credit cards, and grants).
- **REACH (Reentry Entrepreneurship Accelerator CoHort):** This incubator was designed to provide entrepreneurial training to individuals that were returning from the penal system. MBP realized a gap exists in servicing returning and restored residents who have an interest in entrepreneurship. Some might ask, "why

design a special program for formerly incarcerated individuals?” Due to the increasing challenges this population faces in trying to reenter the workforce, there is a need to equip them with skills and a network to start their own businesses. Entrepreneurship provides an opportunity for restored citizens to start their own business and invest in their communities while minimizing systemic discrimination often faced in a challenged job market. Thanks to the support from KeyBank, our work provides education to individuals with criminal backgrounds, equipping them to rise above the stigma associated with their conviction - creating a path to economic opportunity.

- Finally, in addition to the philanthropic support, KeyBank supports the Dayton Chamber by participating in our events, leadership development program participants, volunteering to work our member events, program panelists/speakers, and convening community-wide conversations. While funding is especially important, KeyBank’s human resources are invaluable to our organization.

The above activities demonstrate KeyBank’s commitment to serving underrepresented businesses through philanthropy, lending, investments, products, and volunteerism.

KeyBank’s commitment and actions to serve the needs of low- and moderate-income communities are clear. Key’s partnership and engagement have allowed us to be responsive to community needs and helped us to strengthen the Dayton Region’s economy by investing in those historically disadvantaged businesses and communities.

We are excited to continue our partnership with KeyBank as we work together to meet the needs of our community. If you have questions, please don’t hesitate to contact either of us.

Kind Regards,



Christopher E. Kershner, President & CEO
Dayton Area Chamber of Commerce
cek@dacc.org
937-226-8289



Belinda Matthews Stenson, Vice President
Dayton Area Chamber of Commerce Business Inclusion
bstenson@dacc.org
937-226-8233

Board of Directors

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Su-Ann Newport

Matt Schnelle

Tom Tatham

February 24, 2023

██████████ OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination
Dear ██████████

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Habitat for Humanity of Greater Dayton has been the recipient of several substantial contributions from KeyBank to assist our critical repair work. Because of the support from KeyBank, Habitat for Humanity of Greater Dayton has been able to perform around 60 critical repairs to help people in need over the past 2 years.

Most repairs have been performed for senior citizens. All of the repairs have been executed on owner-occupied homes with household incomes below 60% of the median income level.

KeyBank provided \$25,000 in 2021 for our Critical Repair Program and \$43,100 in 2022 for the same program. KeyBank was specific when they provided the funding that the funds must be used to assist homeowners in low to moderate income census tracks on the West Side of Dayton.


Habitat for Humanity of Greater Dayton appreciates the opportunity to work with ██████████. Both ██████████ have been supporters of Habitat's work. ██████████ served on the Executive Board for Habitat for Humanity Ohio and ██████████ has always been a strong advocate for our work.

KeyBank has been an engaged partner and has demonstrated its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to serve more families and homeowners.

We look forward to continuing our partnership with KeyBank.

If you have questions, please contact me at dmauch@daytonhabitat.org or by phone at (937) 965-7677.

Sincerely,

David Mauch
Development Director
Habitat for Humanity of Greater Dayton





P.O. Box 5805 • Dayton, OH 45405

**Greater Dayton
REALTIST™ Association
Officers & Board
Members**

March 19, 2023

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Kim Williams

President

Traci Martin

1st Vice President

TyYanna Sharp

2nd Vice President

Michele Shehee

Recording Secretary

Kiersten Farmer

Corresponding Secretary

Lisa Scales

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Karen Aaron

Chaplain

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██████████ OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank’s CRA Examination

Dear ██████████

I am pleased to offer comments regarding KeyBank’s Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

The Greater Dayton Realtist Association (GDRA) works to help the underserved in the Dayton area which includes advocating for and educating residents to increase homeownership for low-to-moderate income families, particularly in the Black community. KeyBank has been a continual partner for over 10 years and has supported Greater Dayton Realtist Association’s mission “to promote "Democracy in Housing" by advocating for the underserved through education, leadership, and service.”

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by serving on our Executive Board, providing financial support, participating in special events focusing on L/M buyers and offering loan programs that will help potential buyers become successful homeowners! We also encourage Black Americans to start building wealth through homeownership by offering homebuyer education seminars, wealth-building workshops, discussions with government officials and other agencies regarding the state of housing in the Black community. KeyBank’s support of GDRA is paramount to help us accomplish these very important programs!

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at 937-286-0410 or email me at kimwilliams@howardhanna.com.

Kim M. Williams,

Kim M. Williams

President

Board Members

Veronica Bedell-Nevels

Cora Diggs

Fred Diggs

Drew Huggins

Carolyn P. Jackson

Bianca Miller

Joshua Nalls

Mission

To promote “Democracy in Housing” by advocating for the underserved through education, leadership, and service.

Vision

To be recognized as a source of empowerment for economic development in the communities we serve.





WESLEY
DAYTON
ACTION · IMPACT · CHANGE

February 27, 2023

██████████ OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear ██████████

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Wesley Dayton works with low-to-moderate income individuals through programs that assist community residents gain a better quality of life. From Baby Ready/Infant Mortality, Workforce Development, Food Distribution, After School Programming, Frail and Elderly, Transportation and Community Engagement all provide an opportunity for community residents to achieve personal goals and eliminate barriers that have been a hinderance in the past.

KeyBank has been an engaged partner and has supported Wesley Dayton to serves as a catalyst, convener and connector, in support of the citizens, businesses and organizations of the Westwood neighborhood and West Dayton to improve and enhance the physical, financial, social, emotional and spiritual well-being of the community.

This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by Philanthropic support, Board Development, Financial Literacy/Education, Community Sponsorships and volunteerism.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us increase the capacity amongst staff through staff leadership and development. KeyBank's commitment has also allowed the staff at Wesley Dayton to be compensated for their talents. Lastly, the commitment provided by KeyBank has allowed Wesley Dayton prepare to assist staff with health benefits and increase the quality of life for Wesley staff.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at (937) 263-3556 ext. 214 or email me at skerley@wesleydayton.org

Sincerely,

Shawn E. Kerley
Executive Director



840 Germantown St.
Dayton, OH 45402

February 28, 2023

██████████ OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear ██████████

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Co-op Dayton works to leverage community assets and talents to create cooperative businesses that meet the needs of working class and Black neighborhoods in Dayton, Ohio. A leading example of our work is our development of the Gem City Market. The Gem City Market is a full service grocery store owned by its workers and customers that we opened in a neighborhood impacted by a food apartheid (also known as a food desert). Beginning its operations in May of 2021, the Market serves 400-500 customers a day with fresh vegetables, meat, and pantry staples, as well as housing a community room and teaching kitchen.

KeyBank has been an engaged partner and has supported Co-op Dayton to incubate the Gem City Market. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism. From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by providing needed philanthropic support for our capital campaign to build the Market. Key Bank staff have also advised us informally on many occasions, and provided financial literacy training within the Market to customers.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community. If you have questions, please email me at lela.klein@coopdayton.org.

Best,

A handwritten signature in black ink, appearing to read 'Lela Klein'.

Lela Klein, Co-Executive Director



March 2, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Great Lakes Community Action Partnership (GLCAP) is a community action agency with a 58-year history of providing services to low- and moderate-income individuals, families and communities. GLCAP operates a Financial Opportunity Center, is a certified HUD housing counseling agency, provides financial education and homeownership counseling, has partnered in over a dozen LIHTC projects with for-profit developers, operates several loan funds, along with operating dozens of human service and community development programs, such as Head Start, Meals on Wheels, utility assistance, home weatherization and rehabilitation, and workforce development initiatives, to name a few. Our mission is to move low-income folks and disadvantaged communities to self-sufficiency.

KeyBank has been an engaged partner and has supported GLCAP in our mission. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by providing financial support for our work with moving folks toward self-sufficiency.

P.O. Box 590 **1-800-775-9767** **www.glcap.org**
127 S. Front St.
Fremont, Ohio 43420

This institution is an equal opportunity provider.

Stanley Poszywak
Page 2
March 2, 2023

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs through our direct work with low-income individuals, families and communities.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community. Please feel free to reach out with any questions or for additional information to 419-334-8911 or rahouse@glcap.org.

Sincerely,

A handwritten signature in blue ink that reads "Ruthann House". The signature is written in a cursive, flowing style.

Ruthann House
President/CEO

Angie Franklin
Executive Director

Tiffany Goings
Board President

1933 E. Second St.
Defiance, OH 43512
419-784-5136
fax 419-782-5648
www.nocac.org

Guiding Families
Toward Success

Serving Defiance,
Fulton, Henry,
Paulding, Van Wert
and Williams Counties
Since 1965

February 27, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

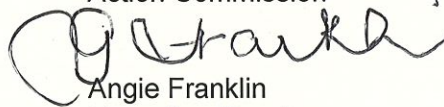
Northwestern Ohio Community Action Commission (NOCAC) is dedicated to minimizing the effects of poverty by connecting individuals to opportunities and resources that support a secure future. Our organization provides a variety of supportive services and programs to low-income families and individuals throughout rural northwestern Ohio. Included in these services is the operation of an Emergency Shelter program, a soup kitchen & community drop-in center, a Financial Empowerment Program, Home Energy Assistance Program (HEAP), Head Start, Homelessness Prevention & Rapid Rehousing programs and permanent supportive housing for chronically homeless persons.

KeyBank has been an engaged partner and has supported NOCAC in our important mission. This support demonstrates KeyBank's commitment to serving low and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, the support of KeyBank has contributed to meeting the needs of our community by providing grant funding to benefit the Financial Opportunity Center which improves the financial health and stability of low-income families through a focus on financial competence, confidence, and capacity. KeyBank's commitment and actions to serve the needs of low and moderate-income communities are clear. Key's partnership and engagement have allowed NOCAC to increase the capacity of our services to effectively and efficiently meet the needs of low-income individuals and families and support progress toward the achievement of stability and self-sufficiency.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community. If you have questions, please contact me at 419-784-5136 ext. 1101 or email me at afranklin@nocac.org.

Northwestern Ohio Community
Action Commission



Angie Franklin
Executive Director

[REDACTED]

From: [REDACTED]
Sent: Thursday, March 2, 2023 2:23 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: [REDACTED] [REDACTED]

[REDACTED]

Please see my response below.

*Lets just be clear on what KeyBank is **Not** going to do:*

1. **Not** going to provide the controlling agreement for this account
2. **Not** going to provide the contact information for its outside counsel
3. **Not** going to provide my [REDACTED] an explanation of why this is happening
4. **Not** going to tell [REDACTED] in writing that [REDACTED] account is in process of being closed and what to expect
5. **Not** going to treat my [REDACTED] like a human deserving of utilizing the banking system with dignity and respect
6. **Not** going to follow its own Community Benefits Plan
7. **Not** going to serve an underserved community
8. **Not** going to honor its marketing offer to my [REDACTED]
9. **Not** going to follow its Funds Availability Policy
10. **Not** going to follow NACHA Operating Rules
11. **Not** going to issue a Reg. CC hold notice
12. **Not** going to provide timely, open and honest responses to Federal regulators
13. **Not** going to attempt to learn from this experience

According to a study commissioned by LendingClub, 63% of Americans live paycheck to paycheck as recently as November 2022. For most Americans, the loss of just 2 paychecks could be catastrophic. Although I am but a simple uneducated, rural bumpkin from the Midwest, I can assure you the actions of [REDACTED] by KeyBank are unreasonable to the average person of caution, care and consideration and inconsistent to those of a vibrant, innovative and functional financial services industry. Trust is the backbone of the entire American economy and consumers must be able to trust that FDIC-insured institutions are acting responsible, with reasonableness and with purpose beyond quarterly results.

[REDACTED] a lifelong public health servant tending to patients in an underserved, racially diverse and chronically understaffed healthcare market, opened an account with [REDACTED] Checking by KeyBank on or about January 30, 2023 after being inundated with marketing materials and based on [REDACTED] previous experience with the [REDACTED] by KeyBank Cashback Credit Card.

On the day of the account application, the account was placed in a pending status until the next business day at which time the account was opened and shown on the electronic website of Laurel Road by KeyBank. Utilizing the information provided by [REDACTED] including routing number and checking account number, [REDACTED] set up direct deposit with [REDACTED] employer, [REDACTED]. On or about February 8, 2023, [REDACTED] effected an electronic debit to [REDACTED] account at KeyBank, with an effective entry date of February 10, 2023. After confirming receipt of the direct deposit on February 10, 2023, [REDACTED] effected a credit from [REDACTED] [REDACTED] account to [REDACTED]

account at JPMorgan Chase Bank. [REDACTED] by KeyBank website showed the transaction request received and stated [REDACTED] JPMorgan Chase Bank account would be debited in an approximate number of business days.

[REDACTED] successfully effected a second debit to [REDACTED] [REDACTED] by KeyBank checking account on February 22, 2023, with an effective entry date of February 24, 2023. The two debits total \$3,000 and comprise a majority of [REDACTED] during the period.

On or about February 16, 2023, [REDACTED] viewed [REDACTED] balance at JPMorgan Chase Bank and realized that the transaction had not been debited to [REDACTED] account as she instructed. That's when she attempted to login to [REDACTED] public facing website using the credentials previously setup when applying for the Cashback Credit Card at some point prior to 2023, and the same credentials used to apply for the checking account and to request the transfer to JPMorgan Chase Bank on February 10, 2023. When she attempted to login on or about February 16, 2023, she received [REDACTED] first notification that [REDACTED] account was in some state of inaccessibility or blocked. On or about that same date she received a letter via USPS from KeyBank- not disclosing [REDACTED] as the marketing brand or identifying the last 4 of the account or any specifics useful to a reasonable consumer to prevent fraud and scams- accusing [REDACTED] of fraud or acting in contravention to the controlling agreement. No specifics were provided nor was she notified that [REDACTED] requested transaction to JPMorgan Chase Bank would not be effected as previously requested.

On or about February 16, 2023, [REDACTED] contacted [REDACTED] for assistance with unlocking [REDACTED] account. Prior to this point neither Laurel Road nor KeyBank had attempted to contact [REDACTED] electronically or telephonically. The representative on the February 16, 2023 call informed [REDACTED] that [REDACTED] account was inaccessible to [REDACTED] and the funds were being held. She stated that she needed these funds to pay [REDACTED] monthly bills. A vague timeline of 45 days or so was offered. No further explanation was elucidated.

During additional contacts, [REDACTED] received vague, confusing and somewhat aggressive responses alluding to the fact that KeyBank and [REDACTED] would hold [REDACTED] funds longer- and that they had the right to do so- because she complained to the CFPB. In addition, [REDACTED] was notified by [REDACTED] on March 1, 2023 that [REDACTED] account was being closed:

An unedited excerpt from the email: *i am sorry for the poor service you have experienced; we are working on closing your account and getting the funds sent to you.*

This email from [REDACTED] was in response to a customer satisfaction survey completed by [REDACTED] regarding [REDACTED] service from [REDACTED]. The response from [REDACTED] leads one to believe that the account is being closed due to the unfavorable survey response. Perhaps it's being closed because [REDACTED] plained to federal regulators or to KeyBank leadership. Furthermore, why is this the manner that [REDACTED] would be notified that [REDACTED] account is being closed.

Recapping the Facts:

- KeyBank has now held the February 10, 2023 and February 24, 2023 paychecks of [REDACTED] with no explanation provided.
- All activity in this account is in accordance with the stated purpose provided when applying for the deposit account. The only activity to date has been direct payroll deposits from the employer stated on the application.
- All activity that has taken place is in the name of [REDACTED], including [REDACTED] direct payroll deposits and the account she linked to at JPMorgan Chase Bank.

- All contacts to [REDACTED] have come from [REDACTED] utilizing the same telephone number she provided when opening the account.
- [REDACTED] has responded to all inquiries from KeyBank.
- [REDACTED] has not received the controlling agreement for this account.
- [REDACTED] has not reported fraud or any concerns to KeyBank outside of the unjustified hold.
- KeyBank has not been asked for additional information to alleviate any concerns or additional diligence requirements.
- KeyBank has failed to identify any Consumer Reporting Company or data source providing input into the decision to suspend or render this account inaccessible, preventing [REDACTED] from disputing any derogatory information. A check of [REDACTED] status within ChexSystems on February 28, 2023 and at the 3 major credit bureaus fail to present any derogatory information.
- [REDACTED] has suffered considerable harm, lost trust in the financial services industry and endured emotional distress from this incident.
- [REDACTED] by KeyBank has a reputation of reporting accounts to ChexSystems or other services by EarlyWarning.
- The [REDACTED] by KeyBank checking account in reference was opened and a debit card provided prior to the first electronic direct deposit.
- KeyBank did not take any efforts to effect a return of the February 10, 2023 or February 24, 2023 direct deposits. If KeyBank had concerns regarding the recipient of the direct deposit it would be reasonable to effect a return of one or more direct deposit.
- NACHA operating rules are not being adhered to in this instance.
- KeyBank is attempting to use a black box model to justify the actions taken on the account in reference.

On a personal note, I have never come across something so alarming in all of my days. Post Dodd Frank, post Enhanced Prudential Standards / Heightened Standards and post CFPB you'd think executives at a large, covered financial institution would have processes to address consumer concerns within a reasonable timeframe. **Nothing in banking takes this amount of time to address.** This has been ongoing since February 10, 2023 and not even communications to [REDACTED] [REDACTED] on February 16, 2023 or to [REDACTED] on February 23, 2023 could resolve this within 5 business days. This feels like an institution devoid of consequences, one with a poor tone at the top and a general lack of consumer banking knowledge and etiquette.

Finally, I will address what I personally find to be the most odious conduct. The inability of [REDACTED] to treat my [REDACTED] like a human being and [REDACTED] to hide behind an enterprise complaints process that is clearly not working as intended. Not one soul at KeyBank has taken the time to listen to the consumer, to listen to the human being behind the account. I pray that none of your family members ever experience the treatment that my [REDACTED] has experienced at the hands of your institution.

Let me know if you don't understand anything stated in this communication.

[REDACTED]
March 2, 2023

On Wed, Mar 1, 2023 at 2:52 PM [REDACTED] wrote:

Hello [REDACTED]

Key is not ignoring the situation so I wanted to write back to reiterate that Key's Enterprise Relationship team will provide a response to your [REDACTED]

[REDACTED]

[REDACTED]
Associate General Counsel

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



From: [REDACTED]
Sent: Wednesday, March 01, 2023 1:35 PM
To: [REDACTED] >
Cc: [REDACTED] >; [REDACTED] >
Subject: Re: [REDACTED] checking account

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

Afternoon,

Since I haven't received a response am I save to assume you are not going to provide me the controlling agreement for this account?

A deposit account agreement I have from a previous Key Bank account- while I imagine this document has been updated- does not allow for the kinds of holds [REDACTED] is currently placing on my [REDACTED] account. It does not take a major leap to see why the controlling agreement is not being shared at this time.

In addition, please provide me the contact information for your outside counsel. I continue to believe that KeyBank is actively engaging in UDAAP, specifically (but not limited to) Deceptive practices. In addition, it appears that Key is managing this account differently than other situated accounts. Since you're unable or unwilling to work with me amicably I must reserve all rights.

Thank you,

On Fri, Feb 24, 2023 at 13:31 [REDACTED] wrote:

Hi [REDACTED]

Thank you. Can someone in the office provide [REDACTED] an update? The last she was told by [REDACTED] was that they had until March to respond. Surely the team is aware of the urgency of holding someone's primary income source.

Also, at your convenience provide me a copy of the deposit account agreement and funds availability policies. I have not been able to locate an agreement applicable for this particular marketing brand and account type. An online agreement is insufficient.

@ [REDACTED] please provide me an authorization to disclose information. If Key does not have a template I will have a POA sent to your attention. It insufficient to not update my [REDACTED] and to then tell me you're handling it.

Thank you,

On Fri, Feb 24, 2023 at 13:23 [REDACTED] wrote:

Hi [REDACTED] thank you for your time today. After we talked, I discovered our Executive Office was already working to address the complaint relating to your [REDACTED] account. They are the experts in working with clients on their issues. Therefore, they will continue to take the lead in working with your [REDACTED] regarding [REDACTED] account.

Thank you, [REDACTED]

[REDACTED]

Associate General Counsel

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



KeyCorp Confidential

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.

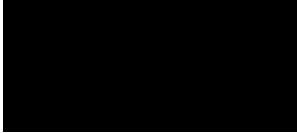
[REDACTED]

[REDACTED]



KeyBank
Enterprise Client Relations
127 Public Square
Cleveland, OH 44114

March 11, 2023



RE: Key Case No. 2EF8A3

Dear 

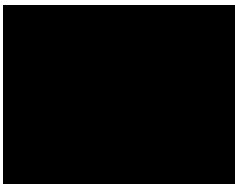
This letter is in response to your issue regarding Laurel Road. We regret the frustrating experience you've had and would like to share the results of our investigation.

KeyBank will provide resolution to the complaint to the account holder.

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



March 7, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Cleveland Neighborhood Progress' mission is to foster the equitable revitalization of neighborhoods throughout Cleveland by strengthening the community development ecosystem. We do this by building the board and staff capacity of the community development corporations and through our CDFI, Village Capital Corporation and our development subsidiary, New Village Corporation.

KeyBank has been an engaged partner, placing a C-suite level person on our Board that is actively engaged in the financial operations of CNP and the CDC network, which includes contributing to the CDC strategic investment initiative grant pool on an annual basis. Key has also supported our work through a four-year investment in the Buckeye and Glenville neighborhoods. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

We do agree that Key Bank, along with most other financial institutions in the Cleveland area, is not meeting the home mortgage and repair needs of traditionally redlined neighborhoods. That limited investment continues to hinder economic opportunity for residents of Cleveland, particularly in Black and low-to-moderate income communities. We have expressed that concern to Key, who is aware of its need for continued improvement alongside other financial partners.

Overall, KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are evident in other ways. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to repair and rehabilitate homes in the Buckeye neighborhood, setting the table for further philanthropic support from local banks.

We look forward to continuing our partnership with KeyBank to make more of our neighborhoods market ready for the Bank's mortgage products. We believe that Key has an opportunity to invest in and partner with local CDFIs to deploy capital in ways that meet its CRA objectives and business goals as well as market needs. Philanthropic support in Cleveland's middle neighborhoods also has the potential to make more of Cleveland's neighborhoods market ready.

If you have questions, please contact me at 216.333.3005 or email me at tmenesse@clevelandnp.org

Sincerely,

A handwritten signature in black ink, appearing to read "Tania Menesse".

Tania Menesse
CEO & President



127 Public Square
Cleveland, OH 44114

March 29, 2023

Cleveland Neighborhood Progress
Attn: Ms. Tania Menesse, CEO & President
11327 Shaker Blvd., Suite 500W
Cleveland, OH 44104

Dear Ms. Menesse:

Thank you for sharing your comments in your letter dated March 7, 2023, regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021. We appreciate you taking the time to share your feedback and look forward to our continued partnership in serving our communities and neighborhoods throughout Cleveland.

KeyBank takes its CRA responsibilities seriously and values feedback from community partners on how we can further our ongoing commitment to serving our communities and neighbors.

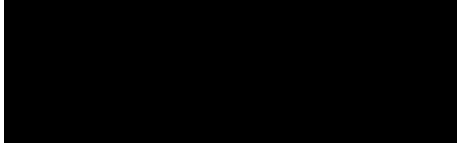
Below are just a few examples of how KeyBank continues to support the Cleveland community:

- Since 2017, KeyBank has invested \$1.83 billion through affordable housing, mortgage, and small business lending in low- and moderate-income communities, and transformative philanthropy in Cleveland and Northeast Ohio. This includes KeyBank's investments in high impact projects such as MetroHealth's Via Sana, University Settlement's 5115 Rising, and the Colfax Family Homes projects.
- KeyBank's philanthropic efforts have contributed to education, workforce development, and building safe, vital neighborhoods in Cleveland. This includes investments in Say Yes Cleveland, seed funding for CHN Housing Partners' CDFI, and investing more than \$3 million across workforce development programs, including CDA's Equitable Development Ecosystem Collaborative to support developers of color in real estate development.
- KeyBank's percentage of home lending in majority minority census tracts (MMTs) has outperformed peer banks every year from 2018-2021. In 2022, nearly 16% of home loans originated by KeyBank in the Cleveland Metropolitan Statistical Area were located in (MMTs).

Key is committed to helping Cleveland's communities thrive as demonstrated by our \$2.1 million investment in Cleveland Neighborhood Progress (CNP) between 2018 and 2021 to restore and revitalize the Buckeye and Glenville neighborhoods. In addition, Key's commitment is amplified through the expertise that KeyBank's teammates offer CNP through board service and other volunteerism.

We appreciate your continued partnership and look forward to additional discussions on how we can collectively address Cleveland's most pressing issues and opportunities.

Sincerely,



Head of Corporate Responsibility & Community Relations

Cc:

Via email: CommunityAffairs@occ.treas.gov
Stanley Poszywak, OCC Examiner-in-Charge
Office of the Comptroller
Large Bank Supervision Constitution Center
400 7th Street SW
Washington, DC 20219



◀ Active complaints

230109-10103820

Primary consumer information

FULL NAME

[REDACTED]

EMAIL ADDRESS

[REDACTED]

PHONE

[REDACTED]

ADDRESS

[REDACTED]

Methods of identification provided by the consumer

ACCOUNT NUMBER

[REDACTED]

Product information

PRODUCT OR SERVICE

Debt collection (Mortgage debt)

ISSUE

False statements or representation

Indicated you were committing crime by not paying debt

CONSUMER IDENTIFIED COMPANY NAME

KEYBANK NATIONAL ASSOCIATION

What happened

The US bankruptcy court granted to re-open my case in December 2022. Home foreclosed in 2021 by Keybank due to Bank of America misrepresenting the mortgage services process. Bank of America used loan fraud and discrimination by failing to make an accurate and complete disclosure of payments through the Obama Administration's efforts to provide relief to my mortgage and homeownership in Cleveland, Ohio. On May 9, 2009, the loan bankruptcy discharged the mortgage debt. They used deception through us a mail and by documents provided through Bank of America. On or about October 2014, Bank of America used an Associate title company to notarize documents under the save the dream foreclosure prevention program. Their mortgage servicing misled me to continue making payments after the bankruptcy discharge. Bank of America worked with PHH mortgage services to hold an escrow account for KeyBank National Association for the government-approved crisis funds. The document Save The Dreams reveals not to make payments; that loan foreclosure prevention would help clear the liens and Residential loans. They used documents and the MERS system to pretext a cause for collection to deprive me of credit and financial information as they knew the housing crises I was hurt. The Chapter 7 bankruptcy experience an undue hardship; the Chapter 7 bankruptcy discharged debt. Bank of America took advantage of me during the crisis and failed to satisfy the liens after they brought out Countrywide Mortgage Service. Instead, they used defective During the pandemic in 2021. My home had illegal foreclosure against Chapter 7 bankruptcy discharge (s) during a state of Ohio state and federal moratorium. 2001, I brought home through the City of Cleveland Homeward program that assigned KeyBank National Association as the bank to be an indirect mortgage holder for the City of Cleveland. The Cleveland Housing Network CHN Partner Network) is the seller of the property in the original loan origination and original warranty deed to the land property is me November 20, 2001, I signed documents at Cleveland Housing Network that included title insurance, homeowner insurance, truth in lending, Hud compliance document, 1003 Fannie Mae application mortgage servicer which, name as Countywide Mortgage Servicer, and agreement was no assumption of the loan, Bank of America used home-retention options to discuss government assistance after my bankruptcy discharge with my mortgage servicer(s), including refinances and programs through Loan Modification/Affordable Mortgage Modification forbearance and forgiveness and lien release. They used the system to Financially Fraud Residential Mortgage-Backed up by government assistance. They breach mortgage contracts and process scams against bankruptcy discharge and crisis.

ALREADY ATTEMPTED TO FIX THIS ISSUE WITH THE COMPANY?

Yes

Desired resolution

Fair Solution is public should know what happened to me, in how mortgage servicers and mortgage lenders withheld indirect loans for a non-profit organization used against 1st time home buyer African-American/Negro women people by using the investor system to take and deprive homeownership of working-class people and their family. How they Discriminated against my bankruptcy. Every party involved should be held accountable for their wrongdoing and audited through the government system for the document they provided through crisis and how the distributed fund was to assist consumers that needed help, and they failed. The Bank of America needs to provide the documents as to when they brought out the Countrywide mortgage in California and how they handle the state of Ohio mortgage in Ohio. They should have the original document loan documents and explain how they were allowed to transfer the agreement between Countrywide Mortgage to PHH mortgage; fail to reaffirm the loan through bankruptcy court. The originally signed documents on November 20, 2001, with a witness that provided that loan is considered a no-assumption loan. 2002-2014. The Statue of Limitation has expired. I want to be refunded me back all my money and all the money they received through save the dream since that act as the mortgage service for Countrywide mortgage to whom they brought out. They can provide all funds they received and; provide documents to PHH Mortgage Service and damages for going against bankruptcy and discrimination during a crisis.

Response recipients

SUBMITTED BY

Primary consumer

WHO WILL RECEIVE RESPONSES?

Primary consumer

What is the company's response?

Response categories

- In progress
- Closed with explanation
- Closed with monetary relief
- Closed with non-monetary relief
- Alerted CFPB
- Duplicate CFPB complaint reported
- Incorrect company
- Sent to regulator

COMPLAINT STATUS**COMPLAINT STATUS**

Pending Action By Company

SENT TO COMPANY

01/09/2023 14:28 ET

DUE DATE


01/24/2023

ACTIONS

 Respond

 Print

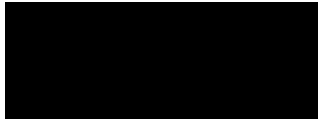
[Terms of service \(terms-of-service\)](#)

 An official website of the United States Government



KeyBank
Enterprise Client Relations
127 Public Square
Cleveland, OH 44114

March 10, 2023



RE: [REDACTED]
CFPB Case No. 221020-9609682
KeyBank Case No. 10723490

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 this concern has previously been filed with the CFPB, and KeyBank previously responded in writing on January 24, 2019, March 30, 2022, and November 18, 2022. I have enclosed all three letters for your review. As stated in the letters, no errors were identified prior to foreclosure proceedings resuming on January 8, 2019. We are unable to advise on what has transpired since January 8, 2019 as the mortgage referenced above is no longer housed with KeyBank, and we recommend contacting Amos Financial LLC regarding your concerns.

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/corporateresponsibility/corporate-responsibility-reporting.jsp>.

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

Attachments

CFPB Letter – January 24, 2019

CFPB Letter – March 30, 2022

CFPB Letter – November 18, 2022



THE CITY OF
CLEVELAND HEIGHTS

KAHLIL SEREN, MAYOR

March 24, 2023

Office of Comptroller of the Currency
400 Seventh St., SW
Washington, DC 20219

RE: Key Bank Branch
closures in Cleveland
Heights, Ohio

Mr. [REDACTED]

I'm writing on behalf of the City of Cleveland Heights and Greater Cleveland Community Reinvestment Coalition (GCRC) regarding the closure of the Key Bank branch at 1836 Coventry Road in Cleveland Heights, Ohio. This is the second branch closure by Key Bank in Cleveland Heights in a period of three years. The first was located at the Severance Shopping Center on Severance Circle. Both branches served many low to moderate income customers as well as a community of African Americans. As of 2020, African Americans make up 40.5% of the Cleveland Heights population.

This bank branch represents an important avenue for outreach for the customers served by the branch. A study done in 2011 by the Federal Reserve Bank of Cleveland found that bank branches play an important role in serving the credit needs of low-and-moderate income neighborhoods. Specifically, the study found that "low-income homebuyers who obtain their mortgages from banks with branches in their neighborhoods are less likely to default than homebuyers who use banks without a branch in the area or mortgage brokers".

<https://www.clevelandfed.org/publications/economic-commentary/2011/ec-201113-do-bank-branches-matter-anymore>

A recent study by the National Community Reinvestment Coalition found that branch closures have accelerated nationally since COVID-19, and have increased the most in Ohio. See "Ohio Outpaces Nation in Bank Branch Closures" in Crain's Cleveland Business, January 23, 2023. <https://www.crainsicleveland.com/finance/bank-branch-closures-ohio-outpaces-national-average>

40 SEVERANCE CIRCLE, CLEVELAND HEIGHTS, OHIO 44118

216•291•4444 www.clevelandheights.gov



THE CITY OF

CLEVELAND HEIGHTS

KAHLIL SEREN, MAYOR

With over \$25 billion dollars in deposits, KeyBank holds a 33% market share of all deposits from Cuyahoga County. As noted in Figure 1 below, this is more than double the market share of deposits held by any other bank in the county. The Coventry Road branch alone had total deposits of over 100 million dollars as of 2022. See “KeyBank Continues to Dominate Deposit Market Share” in Crain’s Cleveland Business, October 3, 2022. <https://www.craainscleveland.com/finance/keybank-continues-dominate-deposit-market-share-northeast-ohio>

Cuyahoga Deposits Held by Banks as of June 30, 2021 and Loans for Purchase, Home Repair or Refinance on 1-4 Family and Multi-Family Homes in Cuyahoga County in 2021 <i>(These 13 banks hold 99% of all Cuyahoga deposits)</i>					
Depository Bank	No. of Branches / Offices	Cuyahoga County Deposits (\$000) as of 6/30/21 ↓	Market Share of Cuyahoga Deposits	Dollars Loaned in Cuyahoga in 2021 (\$000)	% of Deposits Loaned In Cuyahoga County
Keybank	47	25,286,636	33.05%	488,845	1.93%
PNC Bank	38	10,251,489	13.40%	235,020	2.29%
Citizens Bank	37	8,986,469	11.74%	226,465	2.52%
Huntington National Bank	57	8,822,493	11.53%	706,935	8.01%
Third Federal S&L	14	4,948,470	6.47%	505,745	10.22%
Fifth Third Bank	30	4,040,881	5.28%	286,460	7.09%
JPMorgan Chase Bank	26	3,955,370	5.17%	237,780	6.01%
U.S. Bank	31	2,501,158	3.27%	110,370	4.41%
Dollar Bank	21	2,043,812	2.67%	123,700	6.05%
New York Community Bank	20	1,740,437	2.27%	69,930	4.02%
First Federal S&L Lakewood	14	1,323,282	1.73%	325,795	24.62%
Bank of America	5	1,125,057	1.47%	54,100	4.81%
First National Bank of PA	9	625,587	0.82%	206,105	32.95%
Totals		75,651,141		3,577,250	4.73%

Figure 1. Source: 2021 FDIC data and 2021 Home Mortgage Disclosure Data. Prepared by Frank Ford, Fair Housing Center, 2-6-23.

Despite being the ‘hometown bank’ with one third of all deposits, KeyBank’s market share of lending is significantly lower than one third. As noted in Figure 1 above, KeyBank only reinvested 1.93% of its deposits back into the county in the form of mortgage loans, while many of its peer banks reinvested a significantly higher share of



THE CITY OF
CLEVELAND HEIGHTS

KAHLIL SEREN, MAYOR

their deposits: US Bank (4.41%), Chase (6.01%), Dollar Bank (6.05%), Fifth Third (7.09%), Huntington (8.01%), and Third Federal S&L (10.22%).

Figure 2 below shows that in 2021 KeyBank’s lending in the East Inner Suburbs of Cuyahoga County, the market area where the two branches were closed, was substantially less than the volume of loans issued by many of KeyBank’s competitors.

While KeyBank has recently announced a product intended to enhance its mortgage lending, the “Key Cares Loan” product, closing branches where a person could apply for this product is counterproductive.

Top 15 Lenders That Made Home Purchase Loans on 1-4 Family Homes In East Inner Suburbs in 2021 Sorted by Loans Made						
Lender (CBA Lender in red)	Loans Applied For			Dollars Applied For		
	Loans Applied For	Loans Made ↓	Percent of Loans Applied For That Were Made	Dollars Applied For	Dollars Loaned	Percent of Dollars Applied For That Were Loaned
Crosscountry Mortgage	626	497	79%	91,380,000	72,865,000	80%
Huntington Bank	337	237	70%	44,455,000	31,245,000	70%
Rocket Mortgage	298	198	66%	44,580,000	29,310,000	66%
Fairway Independent Mortga	247	191	77%	29,145,000	22,735,000	78%
Howard Hanna Financial	209	168	80%	46,835,000	37,000,000	79%
Third Federal S&L	131	96	73%	24,445,000	18,440,000	75%
First Federal S&L Lakewood	117	92	79%	24,865,000	19,670,000	79%
Union Home Mortgage	112	83	74%	13,970,000	10,585,000	76%
Fifth Third Bank	114	76	67%	16,420,000	12,060,000	73%
American Midwest Mortgage	87	74	85%	13,315,000	11,370,000	85%
Guaranteed Rate	99	73	74%	20,125,000	16,225,000	81%
KeyBank	92	71	77%	24,760,000	19,665,000	79%
United Wholesale Mortgage	89	68	76%	13,795,000	10,980,000	80%
Liberty Home Mortgage	91	64	70%	13,275,000	9,260,000	70%
Chase Bank	87	60	69%	15,715,000	10,680,000	68%
Top 15 Total	2736	2048	75%	437,080,000	332,090,000	76%

Figure 2. Source: 2021 Home Mortgage Disclosure Data. Prepared by Frank Ford, Fair Housing Center, 11-17-22.

We respectfully request an opportunity to meet with you in Cleveland to discuss KeyBank’s closure of this branch.

Thank you in advance for your consideration,



THE CITY OF

CLEVELAND HEIGHTS

KAHLIL SEREN, MAYOR

Kahlil Seren
Mayor

Melody Joy Hart
Council President

Barbara Anderson
Chair Person (GCRC)

Craig Cobb
Council Vice President

Davida Russell
Councilmember

Tony Cuda
Councilmember

Anthony Mattox Jr.
Councilmember

Gail Larson
Councilmember

Janine Boyd
Councilmember

cc: CEO Christopher Gorman

[REDACTED]

The Honorable Sherrod Brown, U.S. Senator, Ohio
The Honorable J. D. Vance, U.S. Senator, Ohio
The Honorable Shontel Brown, U.S. Representative, Ohio, 11th Congressional District
The Honorable Marcy Kaptur, U.S. Representative, Ohio, 9th Congressional District

40 SEVERANCE CIRCLE, CLEVELAND HEIGHTS, OHIO 44118

216•291•4444 www.clevelandheights.gov

[REDACTED]

From: [REDACTED]
Sent: Sunday, May 7, 2023 3:21 PM
To: mayor@clevelandheights.gov; bbrooks@clevelandheights.gov
Cc: [REDACTED] CommunityAffairs@occ.treas.gov
Subject: Re: Letter to KeyBank

Dear Mayor Seren,

Thank you for sharing your feedback and concerns related to KeyBank's consolidation of our Coventry and Severance Center branches in Cleveland Heights and our community investments in Cleveland and Northeast Ohio. We value your feedback and look forward to working with you to meet the needs of our neighbors in Cleveland Heights. I know our team has reached out and we look forward to meeting with you.

KeyBank has made meaningful investments throughout Northeast Ohio through lending, investing, grantmaking, and volunteering. By themselves, these actions will not solve our challenges, but together they move our community forward. Between 2017 and 2022, our investments in Northeast Ohio have totaled more than \$1.8 billion. This includes helping homeowners achieve the dream of homeownership, closing the affordable housing gap, and providing capital to small businesses located in low-to-moderate income communities.

While we've made impactful investments, we are also very aware there is still work to do. A home is not only a source of pride for individuals, families, and communities, but it is also one of the best ways to build wealth. To meet this need, KeyBank has launched new products in addition to our existing loan products including our Key Community Mortgage, FHA Loans, VA Loans, and Fannie Mae HomeReady Mortgages.

I look forward to finalizing a meeting date where we can share additional details, hear any concerns you have, and exchange ideas on ways we can work together to meet the needs of the Cleveland Heights community.

Sincerely,

[REDACTED]

Head, Consumer Banking
KeyBank
127 Public Square
Cleveland, OH 44114
[REDACTED]

High-Risk: ECR - goes to next state in 7 hours - Assigned to [CLF] ECR Team NEW

2/10

May 10, 2023 at 2:16 PM EST [0 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**
05/11/2023, 9:10:45 AM EST - [REDACTED] Customer Advocacy Team
Assigned to [CLF] ECR Team [REDACTED]
- Alert Assigned**
05/11/2023, 9:10:13 AM EST - [REDACTED] Customer Advocacy Team
Assigned to [REDACTED]
- Alert Assigned**
05/11/2023, 8:36:31 AM EST - [REDACTED] Customer Advocacy Team
Assigned to [REDACTED]
- Alert Assigned**
05/11/2023, 7:47:11 AM EST - [REDACTED] Customer Advocacy Team
Assigned to [REDACTED]
- Alert Assigned**
05/10/2023, 2:33:07 PM EST - System Generated
Automatically assigned to [CLF] ECR Team
- Alert status set to New**
05/10/2023, 2:33:07 PM EST - System Generated
- Alert Assigned**
05/10/2023, 2:33:07 PM EST - System Generated
Automatically assigned to [CLF] ECR Team
- Alert status set to New**
05/10/2023, 2:33:07 PM EST - System Generated
- Alert Created: High-Risk: ECR**
05/10/2023, 2:26:35 PM EST - System Generated
High-Risk: ECR

[View Less](#) ^

Score Report

Net Promoter Scores



Contact Center Drivers

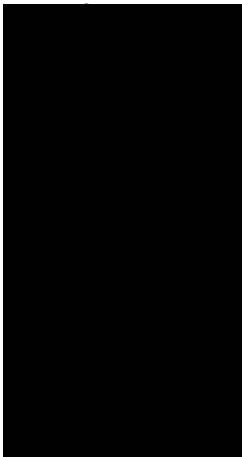


Others


Problem Experienced

Reason for call

Segments




Verbatims

 Reason for Likelihood to Recommend Comment
My daughter-in-law and I went to key bank in [REDACTED] to have her name removed from my account. They had no time for us. Told us to return. I was very upset and felt I was treated rudely. Now, I have no car and she moved. So, only alternative is to close accounts and change banks since we can't physically come in. Your rep on the phone was very concerned and I have nothing bad to say about her. You close neighbor banks. We are forced to go farther from home and then this happens.

I know, I don't have a lot of money. I live pay to pay. But I always felt comfortable with key.

The only reason my daughter-in-law is on my account was to be able to pay me rent. Since they moved, it's not a necessary option for us.

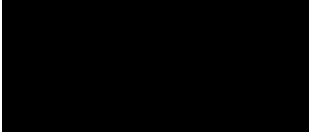
How could KeyBank be better for you?
 Keep more banks open instead of closing them.

Describe Question
Already explained





KeyBank
Enterprise Client Relations
127 Public Square
Cleveland, OH 44114



August 4th, 2023



Re: Key Case No. 2FEV7X

Dear 

Thank you for contacting us regarding your recent concern filed with Executive Offices Of KeyBank related to the  branch closure and  consolidation.

Our records show in May 2023, you went into  and attempted to remove your  from your account. We apologize for the negative experience this has caused.

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/cr-overview.html>

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

Respond

Reassign Alert

Close Alert

Add Note

Subscribe

Profile

Customer Information

Browser Language

City

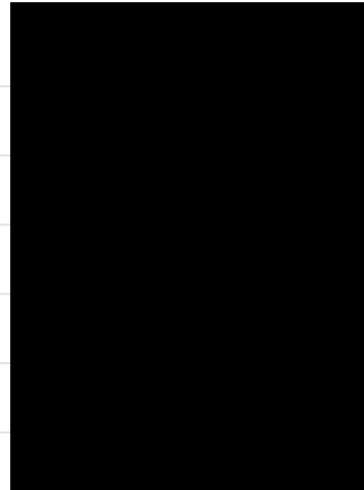
Device

Digital Survey

Origin Type

Region

Client Name



Metadata Information

Response Date (ET)

Survey ID

IPI

Unit



Activity



Alert Overdue

06/23/2023, 12:08:28 PM EST · System Generated



Alert Assigned

06/23/2023, 10:58:47 AM EST · [REDACTED]

Assigned to [CLF] ECR Team by [REDACTED]



Alert Assigned

06/23/2023, 10:51:36 AM EST · [REDACTED]

Assigned to [REDACTED]

View More

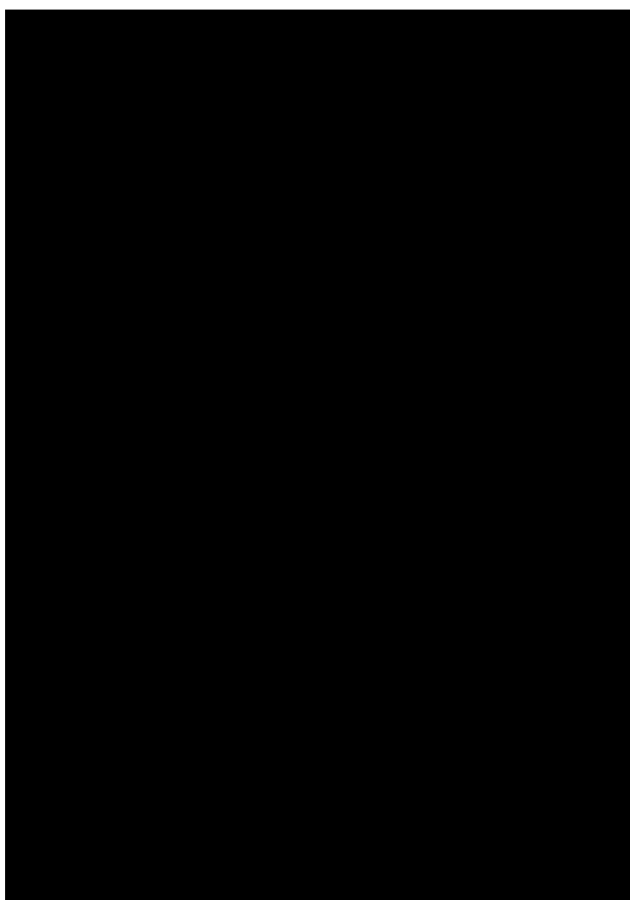
Score Report

Digital Satisfaction

Digital Satisfaction



Custom Parameters



Verbatims



Reason for Score Comment

I hope you will forward this to Public Relations. I am ***** every time I visit Keybank. Your slogan of "keybank Opens Doors" is a joke. You've SHUT the doors of every branch but two in the largest county in Ohio, and then you UNDERSTAFF those. I'm about one more bad transaction away from closing all of my accounts. You've ELIMINATED all the community branches AND the relationships built there. Nice move people..... poor choice of slogans.




KeyBank
Enterprise Client Relations
127 Public Square
Cleveland, OH 44114

August 1, 2023



Re: Key Case No. 2FY1TB

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.

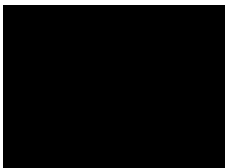
Like any other business, KeyBank continually reviews the structure of its organization to maintain a strong position in the marketplace and remain profitable while continuing to serve the financial needs of our clients. The decision to close or consolidate a branch may be based on decreased client foot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

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,



Enterprise Client Relations
Office of the President