



Greg Gossard
(619) 543-4204
greg@hampstead.com

February 28th, 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 Hampstead Companies works to preserve at-risk affordable housing and create new affordable housing across the country.

KeyBank has been an engaged partner and has supported The Hampstead Companies to help preserve affordable housing by offering creative financing products that allow us to stay competitive in the marketplace and make meaningful change through investment in the communities that Hampstead owns. 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 a full suite of financing products including acquisition debt, construction debt, permanent debt, and tax credit equity.

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 preserve at risk affordable housing and make large scale investment in communities across the country to make them sustainable, healthy, and safe.

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 619 543 4204 or email me at greg@hampstead.com



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San Diego, CA 92101
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Sincerely,



Greg Gossard

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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



Dear Mr. Poszywak,

This letter to is offer comments regarding Key Bank's CRA exam conducted by the OCC for 2019 through 2021.

NeighborWorks Salt Lake was established in 1977 in response to red lining that was occurring in underserved neighborhoods in Salt Lake City, Utah. Public and private sector collaborated with residents in these neighborhoods to create the organization to help revitalize blighted property and engage banks in meeting the credit needs of these struggling neighborhoods.

In NeighborWorks Salt Lakes' 45 years of serving neighborhoods, lending institutions have been and continue to be a critical partner in our non-traditional lending products, real estate development, economic development and our community engagement programs.

I have the privilege of serving NeighborWorks since 1986 and can speak to the tenure of our partnership with Key Bank. I was appointed CEO in 1989 and NeighborWorks established a partnership with Key bank in 1992 to help us respond to meeting the credit needs in the many communities we serve. Key bank has been instrumental in helping build the organizations' capacity to grow our services through their grant program. Responded to our affordable housing development needs through low interest lines of credit and mortgage lending loan pools. Their leadership have played an important role in the governance of the board of directors when Key Bank leadership has served as board presidents and credit committee chairs. Key bank was instrumental in bringing other lending institutions to the table to help create a mortgage lending loan pool to help prevent families from experiencing foreclosure in 2010. These are only a few examples of Key Banks willingness to collaborate with community partners to respond to meeting the needs of low-moderate income communities. Annually, we meet with Key Bank partners to update them on community needs and how they can help NeighborWorks Salt Lake respond to the changing needs in the neighborhoods we serve.

We are deeply appreciative of Key Bank's commitment to Utah communities and look forward to continuing this partnership. Please let me know if you have questions or would like additional information.

Sincerely,

A handwritten signature in blue ink that reads "Maria".

Maria Garciaz
CEO



February 20, 2023

[REDACTED] OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
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.

The South Valley Chamber has a major focus to work with small businesses to help them get the tools and education they need to succeed and thrive. As part of our South Valley Institute, we have our Key Bank Business Academy, which is a 10 week education course, taught by a well know college instructor and successful businessman. During these 10 weeks business owners and leaders learn how to generate financial statements, how to apply for credit, how to create a marketing plan, a business plan and if appropriate a sales plan. They learn about customers and customer relations, business relations, community relationships, competition and learn when to expand and also create an exit strategy. Businesses who have successfully completed this program saw increase in sales, increased and retained their employees and when necessary obtained need financial support from financial institutions.

KeyBank has been an engaged partner and has supported the South Valley Chamber to help us Educate, Advocate, Connect and Grow the businesses in our footprint. This support is also demonstrated by our working together to serving low- and moderate-income neighborhoods through education, 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 Key Bank Accelerator and helped us bring this amazing business training to over 40 low income and/or minority businesses along with 40 other businesses. Key Bank has also been active in our board meetings and committees which has given us the support and insight from a major business and community leader.

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 their support has allowed us to issue scholarships to many of these businesses.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community. The Key Bank Accelerator has become a hallmark and has other chambers of commerce asking lots of questions.

If you have questions, please contact me at 801-7274510 or email me at jay@southvalleychamber.com

Jay K. Francis

President/CEO



UTAH FOOD BANK

Fighting Hunger Statewide

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.

Utah Food Bank works to provide food relief for hungry people in Utah. Through our Emergency Food Assistance program, we distribute food to 230 food pantries and partner agencies. We also fight hunger through direct service programs. These include Kids Cafe, which prepares and delivers nutritious evening meals to children, Mobile School Pantry, which provides monthly food pantry services at high-need schools; the Food Box program, which delivers monthly supplemental food boxes to the homes of low-income seniors and people with disabilities; and the Mobile Pantry program, which offers isolated, underserved communities access to food pantries where none exists.

KeyBank has been an engaged partner and has supported Utah Food Bank with our mission of *Fighting Hunger Statewide*. 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 funds to help us procure and distribute emergency and supplemental food assistance to Utahns experiencing food insecurity in low and moderate-income communities.

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 helped us to provide grocery-style food to children and their families in high-need schools, provide emergency food assistance during the COVID-19 pandemic, and develop the infrastructure to better provide culturally responsive foods in diverse low-income neighborhoods. We look forward to continuing our partnership with KeyBank. If you have questions, please contact me at 801-978-2452 or email me at ginetteb@utahfoodbank.org.

Ginette Bott
President & CEO

Ginette Bott, President & CEO
Jennifer Pratt, CFO
Scott Woodhead, COO

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