



March 21, 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 Center for Inclusive Entrepreneurship (CIE) helps people with limited resources take the lead in creating equitable, resilient, and sustainable local economies through entrepreneurship and business ownership. Reaching deep into marginalized communities, we meet people where they are, actively listen to their ideas and challenges, and offer ongoing individualized support to help them achieve their goals. Leadership develops as they launch microenterprises, move out of poverty, build generational wealth, create jobs, and contribute to rural places that thrive.

KeyBank has been an engaged partner and has provided philanthropic support in 2020, 2021 and 2022. Thanks to Key's support, we have served 300 North Peninsula clients who have started 37 new businesses, mobilized \$3,455,356 in business capital, and created 89 new jobs.

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 (206) 235-6029 or email me at mike.skinner@cie-nw.org.

A handwritten signature in blue ink, appearing to read 'Mike Skinner', with a long, sweeping underline.

Mike Skinner
Executive Director



**Creating Self-Esteem
Creating Friendship
Creating Community
Since 1969**

**Administration Office
2212 S. Jackson St.
Seattle, WA 98144
(206) 322-2387 Fax: (206) 324-2520**

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.

Community Housing Mental Health Agency (CHMHA) works to provide a supportive family atmosphere in Seattle and King County for people with severe and persistent mental illness by providing mental health services to low and moderate income individuals in King County, WA. As an alternative to traditional clinical treatment, Community House provides a supportive family atmosphere for its members in which they can feel a sense of belonging and grow at their own pace. Community House members are encouraged to help design their own treatment. Staff incorporate a broad base of therapeutic approaches while maintaining a relationship that is open, informal, and caring. We provide a peer support day program, crisis intervention, medication prescription and management, and assistance and direction to assist members with basic living needs.

KeyBank has been an engaged partner and has supported CHMHA to provide affordable housing in conjunction with their mental health services to the community. This support demonstrates its commitment to serving low and moderate income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

In 2018 KeyBank, National Equity Fund and CHMHA partnered on a LIHTC affordable housing project in Seattle, WA. Thanks to CHMHA, residents have a full mental health clinic available to them for support with services onsite. This project was built and began lease-up during the pandemic where it experienced a high percentage of non-paying tenants. In order to support the tenants and CHMHA, KeyBank has authorized several extensions to this project and continues to work CHMHA to stabilize this development in service to 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 provide additional affordable housing and mental health services to households with 50-60% area median income in the heart of Seattle.

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 email me at cszala@chmha.org.


Chris Szala
Executive Director
Community House Mental Health Agency



COMMUNITY ROOTS
— HOUSING —

February 28, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
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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.

Community Roots Housing develops, preserves, and manages affordable homes for over 2,000 of our neighbors across Seattle. Our organization operates on the belief that this vital work is best accomplished by engaging in deep-rooted partnerships.

KeyBank has been an engaged partner of **Community Roots Housing for many years** and has consistently supported our organization's **efforts to foster vibrant and engaged communities**. This support has exemplified KeyBank's commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

Between 2019 and 2021, KeyBank worked with us to meet the needs of our community by sponsoring multiple events annually, bringing in critical funds to support our work that totaled roughly \$34,500. In 2020, KeyBank supported our COVID-19 Resilience campaign, granting \$15,000 to help us to provide emergency rental assistance to affordable housing residents that had been financially impacted by the pandemic. Additionally, KeyBank has helped to support local small businesses, sponsoring \$7,000 in restaurant stipends to offset the costs for the restaurants that participate in our annual food festival fundraiser. [REDACTED] KeyBank's DEI Strategy and Engagement Officer, has served on our Foundation board for many years, occupying several board leadership positions throughout her tenure. Currently, [REDACTED] holds the Vice President role on the board.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed Community Roots to be responsive to community needs and helped us to fund this critical work and support our neighbors across the city.

Our two organizations share many core values, and we look forward to continuing our invaluable partnership with KeyBank.

If you have questions, please contact me at cpersons@communityrootshousing.org

Christopher Persons, CEO
Community Roots Housing



FARESTART

GREAT FOOD • BETTER LIVES

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.

FareStart is a Seattle-based nonprofit organization with a mission to transform lives, disrupt poverty and nourish communities through food, life skills and job training. We serve individuals who are furthest from opportunity and most affected by poverty, homelessness and hunger through job training, supportive services and food programs. We provide social services while managing mission-driven social enterprises businesses to deliver on-the-job training opportunities for students and to feed the community. Our holistic approach provides pathways toward achieving personal stability, economic mobility and food security.

KeyBank has been an engaged partner and has supported FareStart in our efforts to promote personal stability and economic mobility through job training. 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 (through grant awards and matching employee donations in 2021 and 2020) and engaging employee volunteerism with FareStart's work.

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 whole-person job training and supportive services to those furthest from opportunity in the greater Seattle area.

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 206.267.6223 or email me at Erika.van.merr@farestart.org.

Erika Van Merr
Director of Institutional Giving

Tuesday, March 14, 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.

Pan African Center for Empowerment or PACE is a Seattle-founded nonprofit that seeks to elevate the quality of life for people of African heritage across the globe. We use modern, cross-disciplinary tools to deconstruct the systems that oppress our communities and build human-centered, tech-powered solutions in their place. Through professional development resources, health and wellness initiatives, arts projects, media production, and more, PACE reimagines and re-forms the shared experience of the African Diaspora, so that we may be connected by our power rather than our pain.

Support from KeyBank's Community Reinvestment Act has gone to support one of PACE's programs, Nurturing Roots, a community urban farm program that provides volunteer opportunities, partners with local restaurants and hosts on-site gatherings and educational workshops where individuals, organizations, corporate groups and community members of all ages are able to learn about environmental justice and food systems that directly impact our community.

KeyBank has been an engaged partner and has supported PACE to elevate the quality of life for people of African heritage. 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.

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 increase our community outreach, self-sufficiency and volunteerism.

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 785-250-7372 or email me at jsc@getonpace.org.



Jade Solomon Curtis

Chief Operations Officer, PACE

ST. ANNE HOSPITAL FOUNDATION

March 10, 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.

St. Anne Hospital Foundation works to support the health of our local community in Burien, WA. Our vision is for everyone who lives in our community to experience excellent, compassionate care because St. Anne Hospital has the generous support of Foundation donors for the resources it needs to enhance people's health and to save lives.

Donations to the Foundation help to improve the health of everyone we serve. Our support provides: car seats and pack & plays to new mothers in need, food and gas cards to low income cancer patients, clothing to patients through our emergency clothing closet, urgent and critically needed medical equipment to the hospital, support to our staff through the employee assistance program and much more.

KeyBank has been an engaged partner and has supported **St. Anne Hospital Foundation to engage our community so that everyone has access to exceptional health care close to home.** 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 funding several of our Foundation programs. KeyBank has supported our low income cancer center patients with food & gas gift cards and rent assistance. As well as, our Health Connections program, serving those patients that need help navigating the health care system and understanding their complicated health conditions. In 2020, KeyBank funded a much needed COVID Relief program to support St. Anne Hospital's patients and employees.**

██████████ from KeyBank serves on our **St. Anne Hospital Foundation Board of Directors.**

ST. ANNE HOSPITAL FOUNDATION

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 support and care to our most vulnerable patients, our hospital staff and 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 **206-901-8507** or email me at **charlene.gillmore@vmfh.org**.

Thank you,

Charlene Gillmore

Charlene Gillmore
St. Anne Hospital Foundation
Director of Individual Giving



treehouse™

3/10/2023

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

Treehouse works to close the opportunity gap for youth and young adults experiencing foster care in Washington. We work directly with youth to provide support, and lead policy advocacy and collective action toward systems change. We fulfill our mission through programs that meet basic material needs, fund extracurricular and school activities, and provide individualized coaching and support for academic success and the transition to adult independence.

KeyBank encourages its teammates to provide expertise through volunteerism and board service. Their teammate has supported Treehouse to give youth in foster care a childhood and a future 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 contributing \$50,000 in philanthropic funds across program grants, sponsorship and matching gifts, meeting the basic needs of youth experiencing foster care my volunteering in our free Treehouse store, led financial literacy workshops for Treehouse youth, volunteering on our Treehouse Ambassador Board, and service on our board of directors.

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 youth in foster care as they complete high school and transition to independence.

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 **206-471-4171** or email me at kayla.eddy@treehouseforkids.org.

Kayla Eddy

Corporate Relations Officer



Washington
Community
Reinvestment
Association

► Susan M. Duren
President

► Dulcie J. Claassen
Vice President and
Director of Lending

► Angel L. Ratliff
Assistant Vice President and
Loan Servicing Officer

► NJ Olson
Loan Closer

February 28, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
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Via email to CommunityAffairs@occ.treas.gov
KeyBank at cra_comment_letter@keybank.com

Member Banks

1st Security Bank of Washington

Ally Bank

Bank of the Pacific

Bank of the West

Banner Bank

Beneficial State Bank

Cashmere Valley Bank

Cathay Bank

Columbia State Bank

The Commerce Bank of
Washington

East West Bank

First Fed Bank

First Financial Northwest Bank

First Republic Bank

First Sound Bank

Heritage Bank

HomeStreet Bank

JPMorgan Chase, N.A.

KeyBank

Kitsap Bank

North Cascades Bank - Division
of Glacier Bank

Northern Trust Bank

Olympia Federal Savings and
Loan Association

Pacific Crest Savings Bank

Pacific Premier Bank

Riverview Community Bank

Seattle Bank

Timberland Bank

Umpqua Bank

MUFG Union Bank

Washington Federal

Washington Trust Bank

Wells Fargo Bank

Yakima Federal Savings and Loan
Association

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 Washington Community Reinvestment Association (WCRA) works to provide below market financing for affordable rental housing including preservation and manufactured home parks, special needs housing, and economic development, including early learning facilities in Washington state. Our 34 bank members provide the funding for our financing along with State and municipal financing. KeyBank's participation in our lending programs has been in effect since our inception in 1992 and they are the largest participant and provide all our corporate banking needs.

KeyBank has been an engaged partner and has supported WCRA to meet Washington's affordable housing and economic development needs through partnership and to cause us to meet our guiding principles. This demonstrates its commitment to serving low- and moderate-income neighborhoods through lending, investments, products, and volunteerism. From 2019 to 2021, KeyBank has worked with us to meet the needs of our community and provide board of director and loan committee representation and partnering on affordable housing developments.

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 be the leading CDFI bank consortium lender in Washington. 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 206 498 3519 or email me at sduren@wcra.net.

Sincerely,

Susan M. Duren

President

1200 Fifth Avenue Suite 1406 Seattle, Washington 98101
(206) 292-2922 FAX (206) 292-0782
www.wcra.net

Meeting Washington's Affordable Housing Needs Through Partnership

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

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.

Washington Farmland Trust works to protect and steward threatened farmland across the state. We keep land in production by making it accessible to a new generation of farmers. KeyBank has been an engaged partner and has supported the Trust in our efforts to create a more sustainable and resilient future for our state by working in partnership to protect farmland and prioritize the needs of local farmers and the community.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community through philanthropic support of our Farm to Farmer network, which provides land access to a new generation of Washington's farmers, particularly those who have been subject to prejudice and discrimination because of their race, ethnicity, gender, and/or status as a military veteran.

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 and deepen the impact of Farm to Farmer. This past year, the Farm to Farmer team focused on building authentic relationships by centering curiosity with our farmer and landowner clients and partner organizations. Through conversations and collaboration, we learned so much about how to make our program more accessible and are determined to continue to serve more communities and create greater access to collective farmland ownership. We've helped farmers find land *and* community and are expanding relationships with organizations and collectives of farmers from historically underserved communities to explore innovative land tenure strategies. To date we've facilitated more than 170 introductions between farmers and landowners and made 21 successful land matches. This means 21 local farms now have land to farm. We receive calls and inquiries every day from new and aspiring farmers who are looking for support as they grow their farm business.

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 206-777-4385 or email me at mcampbell@wafarmlandtrust.org.

Warmly,

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

Melissa Campbell
Executive Director



Wellspring

2/27/2023

[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 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.

Wellspring Family Services (501c3 #91-0567261) is on a mission to end the cycle of family homelessness for good. Since 1892, Wellspring has delivered support services to children and families experiencing or at risk of homelessness. We foster generational stability for families through prevention and early intervention of homelessness. By connecting families with housing assistance, financial and tenant education, preschool education for their children, and children's essentials, Wellspring provides a safety net to help people remain stable and housed.

KeyBank has been an engaged partner with Wellspring in the Greater Seattle area for over 20 years and has supported our mission to end the cycle of family homelessness. Through their corporate philanthropy they have directly supported each of our family service programs: the Wellspring Family Store, Housing Services, and Early Learning Center. This dedication to our mission has provided our families with the opportunity to find positive lasting change in their lives.

*Wellspring Family Services is a 501(c)3 non-profit organization. Our Tax ID is 91-0567261.
Your donation will be directed towards the general operations of Wellspring which supports our Community Services programs.
No goods or services were received in exchange for this donation.*

From 2019 to 2021, KeyBank provided us with an unrestricted financial gift that was used towards general operations and COVID relief. Because of partners like KeyBank, in 2021 2,888 families received housing services, 2,982 children received the clothing formula, and hygiene items they needed, and 45 children received trauma-informed preschool education and were served 11,358 healthy meals. Families received these services at no cost or through scholarships.

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 connect more families with community resources and make strides towards our goal to prevent and end family homelessness.

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 (206) 902-4259 or email me at tmurray@wellspringfs.org.

Sincerely,



Thom Murray

Director of Corporate & Foundation Relations

YWCA IS ON A MISSION

eliminating racism
empowering women
ywca
Seattle | King | Snohomish

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

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.

YWCA Seattle – King – Snohomish is on a mission to eliminate racism and empower women. Our housing and homelessness, economic advancement and health and safety programs remove barriers to equity and create pathways to stability for those who are furthest from opportunity, especially BIPOC women and families. We address the lack of stable, affordable housing in our region by providing transitional and permanent housing and related support services and advocating for local policy change. Our job training, job placement and career development programs help low-income residents overcome barriers to employment, secure living wage jobs and build career pathways.

Our local KeyBank partner has supported YWCA in its mission to eliminate racism and empower women by engaging as an active board member and volunteer. This support demonstrates their 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 our Economic Advancement programs, general operations, event sponsorship and workplace matching gifts.

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 support our BankWork\$ program for low-income job seekers who want to obtain in-demand jobs in the banking industry; our Greenbridge Learning Center, which provides job training, placement, financial coaching and specialized employment services for south King County residents, particularly immigrants and refugees; and for our organization overall.

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 206-461-4432 or email me at fkremen@ywcaworks.org

Sincerely,

Fran S. Kremen
Corporate and Foundation Giving Officer

May 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

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

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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 Foundation for Tacoma Students is the anchor supporting a movement called Graduate Tacoma. We seek to build and strengthen a community effort that helps every child achieve success from cradle to college and career. We address education inequities through strategy incubation and ideation, aligned funding, and supporting direct service providers to improve service delivery methods through a myriad of professional development opportunities. Our most recent endeavor focuses on creating better pathways for high school graduates to navigate into meaningful postsecondary opportunities.

KeyBank encourages its teammates to provide expertise through volunteerism and board service. KeyBank has supported our organization 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 being present in conversations surrounding the persistent impediments to social and economic mobility of the residents of Tacoma. KeyBank staff have volunteered, offered support, and given resources to the community's needs when requested. And, many of KeyBank's staff serve as strategic thought partners across various systems, supporting our local community in the advancement of change. Specifically for the Foundation for Tacoma Students, KeyBank staff has participated in national funding conversations leveraging their support of our work and encouraging the investments of others to advance our shared outcomes.

KeyBank staff have offered board governance to our organization, which has a footprint of more than 30,000 students in our region. And in addition to the advocacy of financial investments from KeyBank to the Foundation for Tacoma Students, KeyBank staff have supported the strengthening of a financial model that will help this organization to be sustained over time. These examples make the case for how KeyBank is in fact committed to the well-being of non-profit organizations' sustainability and overall impact on our communities. KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear and we are thankful for their support

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 253-272-1600 or email me at tervin@graduatetacoma.org

Dr. Tafona Ervin
Executive Director

DocuSigned by:

5A7B94FE8C954A9...

3/17/2023

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

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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.

Mi Centro works to cultivate the advancement of the Latino and Indigenous communities by providing social services and educational programming while honoring our heritage and culture through the arts. Our organization has existed since the early 1990s and has continued to be located in the historic Hilltop neighborhood in Tacoma, WA. Today, Mi Centro provides civics education, business support, domestic violence victim services, and is opening an arts gallery in late 2023.

KeyBank has been an engaged partner and has supported Mi Centro to achieve our mission of Latino economic prosperity. 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 investing in our education department. With KeyBank's crucial investment, Mi Centro has been able to launch and sustain its scholarship program and provide over \$10,000 in scholarships to 7 awardees in the Q4 of 2022. KeyBank has continued its commitment to Latino scholarship and reinvested in our organization, in which we plan to double the number of scholarship awardees this year.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear and Mi Centro plans to continue our partnership with KeyBank as we work together to meet the needs of the Latino community.

If you have questions, please contact me at 360-553-2874 or email me at adan.espino@micentrowa.org.

Saludos,
Adán Espino Jr
Director of Education & External Affairs, Mi Centro



March 10, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
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Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am writing 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.

Sound Outreach's mission is to empower Pierce County residents to achieve their financial dreams through an integrated model of coaching and counseling to secure personal financial security. Sound works so that all Pierce County residents possess the ability and confidence to build financial security, grow generational wealth and create prosperity. 96.5% of the clients served by Sound Outreach have a household income at or below \$81,000 - below the \$81,440 set for 2022 for our Metropolitan Statistical Area (MSA).

One of our board members is a KeyBank executive serving her second term with us. While this executive has risen through the ranks from a local level to a national position, she has continued to be a vital and active member of the Board.

From 2019 to 2021, KeyBank supported our organization through annual grants and sponsorship of our annual luncheon. Key's partnership and engagement have allowed us to be responsive to community needs and helped us serve households with rental assistance at the height of the pandemic. 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 (253) 208-7496 or email me at bryan@soundoutreach.org.

Sincerely,

Bryan Flint

Executive Director

1106 Martin Luther King Jr. Way ☎ Tacoma, WA 98405
phone 253.593.2111 | soundoutreach.org



March 17, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
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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.

Pacific Education Institute works to support educators by specializing in professional learning and FieldSTEM implementation. We provide workshops and ongoing support to K-12 educators statewide to help them engage students in integrated, career-connected outdoor-based STEM learning. PEI intentionally seeks out underserved schools and districts to increase access to quality educational resources and programs. We also offer climate science workshops on topics like urban forestry, regenerative agriculture, food waste and coastal hazards which emphasize environmental justice and culturally responsive learning.

KeyBank has been an engaged partner and has supported Pacific Education Institute to provide professional learning opportunities and ongoing guidance for educators in regions throughout Washington State. 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 PEI to meet the needs of our community by providing grant funding to support Urban Forestry workshops for K-12 teachers in Yakima and in the Puget Sound region. Urban forestry is an important topic within Washington State. A growing body of research demonstrates lower income neighborhoods with high density heat-absorbing buildings and pavement are hotter than higher income neighborhoods, which have a higher density of trees and greenery. This phenomenon disproportionately impacts communities of color in urban regions throughout the United States. Groups at greater risk for heat-related health impacts include outdoor workers, people who are homeless, and those with limited personal resources to deal with extreme heat.

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 offer workshops designed to increase teacher's understanding of environmental justice and the multiple benefits of urban trees. At these workshops, teachers learned how to collect and analyze tree canopy data across socio-economic variables in an urban environment, synthesize the data into comparative research topics and facilitate the application of these research findings to

implement student driven, community-based solutions. The projects worked with marginalized communities who are furthest from environmental justice and communities served by Key Bank.

Key Bank's support has helped to kickstart PEI's efforts to design an Urban Community Forestry framework for K-12 educators. We are in the early stages of this work which will provide under-resourced districts statewide with tools and resources to engage their students in relevant, authentic STEM learning which benefits their communities.

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 360.489.6769 or email me at kkurtz@pacificeducationinstitute.org.



Kathryn Kurtz
Executive Director



724 Columbia Street NW, Suite 255
Olympia, WA 98501
360.489.6769
kkurtz@pacificeducationinstitute.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

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.

Africatown Community Land Trust works to engage in community development projects in and around the main node of the Central District at 23rd and Union. ACLT's mission is to acquire, steward, and develop land assets necessary for the African diaspora community to grow and thrive in its historic place in Seattle's Central District.

KeyBank has been an engaged partner and has supported **Africatown Community Land Trust to meet its mission through their support of our real estate development efforts**. 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 **assisting in the provision of key philanthropic operational support over a multi-year period**. This early capacity driven support was instrumental in allowing ACLT's early staffing and start up efforts to be successful. In addition, as ACLT has grown its real estate pipeline, KeyBank has been an instrumental partner in making sure our organization has been able to participate in funding opportunities specific to our 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 **grow as an organization. Of our many accomplishments we are most proud of our ability to purchase the "Keiro," property, a former nursing home directly across the street from the Langston Hughes Cultural Center. Without KeyBank's early philanthropic support, we would have been unable to have the staffing capacity to complete this transaction.**

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 **347-414-4492** or email me at **muammar@africatownlandtrust.org**.

Muammar Hermanstynne

Muammar Hermanstynne, VP Real Estate

Africatown Land Trust

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

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.

KeyBank has been an engaged partner and has supported BRIDGE Housing in our mission to strengthen communities and improve the lives of its residents by building and preserving affordable housing, and by providing necessary resources and services to our 40,000 residents. 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 on several affordable housing projects. One particularly important project is Coronado Springs in Seattle. This 332 unit community was nearing the end of its regulatory period, threatening the residents with losing the affordability of their homes. Key Bank provided a flexible \$20 million bridge loan for us to acquire the project quickly so we could preserve affordability while we structure a recapitalization.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key sponsored a \$6 million PPP loan for BRIDGE that allowed us to maintain our full staffing level during the pandemic and continue to serve our communities in the best possible way. 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 **(415)321-4047**, or email me at jdmath@bridgehousing.com

Jim Mather | Chief Investment Officer

BRIDGE Housing

600 California Street, Suite 900 | San Francisco, CA 94108

D: 415.321.4047 | bridgehousing.com

March 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 ██████████

Tacoma Community College and the Tacoma Community College Foundation are pleased to offer comments KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

The Tacoma Community College Foundation raises funds and support for the students and community of our college. Our work has focused on providing wrap around services for TCC students. These wrap around services are prioritized in the areas of 1) Financial scholarships for TCC students; 2) Emergency financial support for students experiencing unexpected financial challenges such as car repairs or high-cost utility bills; 3) Food Pantry support to assist students and their families who are experiencing food insecurity; and 4) Temporary housing assistance for TCC students experiencing homelessness or near homelessness.

KeyBank has been a long-term supporter and partner with Tacoma Community College and the TCC Foundation in working to help our students in all wrap around service areas. This support demonstrates KeyBank's commitment to serving low- and moderate-income individuals through their philanthropic assistance.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our college community by funding our Food Pantry, helping us to serve more than 3,300 students in need with food insecurity issues. KeyBank has also been a leader in financial support to the Emergency Assistance fund, where more than 525 TCC students have benefited from financial support to help with unexpected financial emergencies.

And KeyBank has been a long-time supporter of TCC students by funding an endowed scholarship fund, where dozens of students have achieved their financial goals thanks to the KeyBank scholarships.

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

Sincerely,

William Ryberg
Vice President and TCC Foundation Director
Tacoma Community College
6501 S. 19th Street, Tacoma, WA 98466
Phone 253.566.5336
Email bryberg@tacomacc.edu

March 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.

Girl Scouts of Western Washington works to deliver leadership outcomes for girls and gender expansive youth in grades K-12. We empower youth as they develop five attitudes, skills, and behaviors essential to effective leadership: strong sense of self, positive values, challenge seeking, healthy relationships, and community problem solving. This process is supported by five program pillars including STEAM, Entrepreneurship (including 15 financial literacy badge programs), College & Career (providing mentorships and pathways to jobs), Outdoors, and Life Skills.

KeyBank has been an engaged partner and has supported Girl Scouts of Western Washington to achieve our mission to build Girl Scouts of courage, confidence, and character so they can make the world a better place. Paramount to our mission is our commitment to purposefully serve youth from historically underserved communities. Over 3,000 Girl Scouts – or 20% of our youth members – attend Title 1 Schools, participate in their school's free and reduced lunch program, or are in foster care. We provide financial assistance to these youth as one of our key initiatives to remove barriers of participation to Girl Scouting. Through our pillars, we provide education to break the intergenerational cycle of poverty. 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 ongoing programmatic support of our STEAM educational program pillar and sponsorship of our annual fundraising events. Our annual STEAM grant from KeyBank includes a financial assistance component, and all of the events that KeyBank sponsors are designed to raise money to support our financial assistance program. Girl Scouts of Western Washington is supported in our work with over 5000 active volunteers. KeyBank employees are encouraged to support the organization through volunteerism as well.

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 deliver on our mission and to insure that the development of leadership outcomes are available to all youth no matter their income level, race, ethnicity, sexual orientation, ability, and religion; and that these youth reflect a spectrum of gender identity, and live across rural, suburban, and urban geographic locations.

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 206-755-3378 or email me at wbrewer@girlscoutsww.org .

Wade Brewer

Wade Brewer
VP Strategic Partnerships
Girl Scouts of Western Washington

March 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 ██████████



On behalf of Woodland Park Zoo, 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. KeyBank has been an engaged partner and has supported Woodland Park Zoo's mission to save wildlife and inspire everyone to make conservation a priority in their lives. This support demonstrates KeyBank's commitment to serving low- and moderate-income neighborhoods through philanthropy.

Woodland Park Zoo achieves its mission through ecological and empathy-based education and landscape-level field conservation programs that conserve wildlife, preserve fragile habitats, increase public awareness for wildlife and environmental issues and empower individuals and communities to participate in conservation action. Through the Community Access Program, one of the largest access programs in Washington, our zoo partners with hundreds of organizations that specifically serve low-income and/or at-risk children and adults or other demonstrated underserved groups to provide them with free admission passes for their clientele. Likewise, the zoo's educational programs offer free participation for educators and students through scholarships and/or through co-creation of programs with nonprofit partners for their clientele.

From 2019 to 2021, KeyBank worked with us to meet the needs of our community in a variety of ways. ██████████ Seattle Market President of KeyBank, served as a zoo board member 2016 to 2021. From 2019-2021, ██████████ led the Investment committee and served on the Concept and Design committee.

KeyBank's partnership and engagement also helped us to offer programming to underserved youth. From 2019 to 2021, KeyBank awarded funds to the following Woodland Park Zoo education programs:

- In 2019, KeyBank donated \$13,101 to support our Up Close Ambassador Animals outreach programming for Title 1 recipient schools, including Highline School District. Educators selected this in-classroom program, designed to bring the zoo to students and get them excited about the natural world, to help meet requirements for Washington state science curricula.
- In 2020 when in-person programming was not possible due to the pandemic, KeyBank donated \$11,351 to help our zoo educators provide conservation science curriculum to educators in Washington to meet state standards. KeyBank's support enabled the development of the zoo's distance learning platform, Discovery Den.
- In 2021, KeyBank provided \$30,000 toward the zoo's Conservation Career Talks programming. This program was provided to underserved youth ages 10 to 18 and provided opportunities for participants to learn about a variety of STEM and conservation careers, such as veterinary medicine, education, conservation

science and communication. Conservation Career talks were provided to youth and their mentors through partnership with Big Brothers Big Sisters of Puget Sound, and were also available virtually for educators to share with their classrooms or homeschool students, through Discovery Den.

In addition, KeyBank donated \$10,000 to the zoo in 2021 as a Silver sponsor of the 45th annual Jungle Party, the zoo's signature fundraising event that raised \$1,800,000 for our most critical needs, such as public access, education programs, field conservation work and animal care.

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

If you have questions, please contact me at 206.548.2624 or email me at Sarah.Valentine@zoo.org.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Sarah Valentine', with a long horizontal flourish extending to the right.

Sarah Valentine

Chief Development Officer, Woodland Park Zoo

March 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.

Homeownership Center Northwest works to create affordable homeownership opportunities to help revitalize and stabilize neighborhoods and create assets for low- and moderate-income families.

KeyBank has been an engaged partner and has supported Homeownership Center Northwest in building new and rehabilitating existing homes and offering these homes for purchase to low- and moderate-income families. Additionally, KeyBank's support has helped HCNW provide financial and credit counseling, and homeownership education to first time home buyers. 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 to our organization and home loans to our clients.

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 offer affordable homeownership to 14 families between 2019 and 2021, three of which included home loans from Key Bank.

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 253-627-6560 or email me at sue@hcthomes.org.

In Partnership,

A handwritten signature in cursive script, appearing to read "Sue Elkin".

Sue Elkin
Executive Director

Hello ECR Team,

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

Client Information

Name(s)	[REDACTED]
Mailing Address	[REDACTED]
Preferred Phone(s)	Not provided
Preferred Contact Times	Not Provided
SSNs	Not provided
Other Pertinent Client Details	

Application/ Loan Information

System + App or Acct Number(s)	[REDACTED]
Scenario	[REDACTED]
Product/ Term	
Status	

Related KeyBank Employee Information

MLO or Branch Employee	[REDACTED]
Manager	[REDACTED]
Other Pertinent Employee Details	

Complaint Information

Critical Deadline(s)?	
Date of Client Escalation	2/23/2023
Date Rec'd by KBM Complaints	2/28/2023
Contact Method	Escalated to MLO
Summary of Complaint (in client's words)	<p>Yes I would. So per our conversation I understand because my neighborhood does not have a certain percentage of a certain race or national origin that I am being denied the lower interest rate and no origination fees that someone living in a different neighborhood with a certain percentage of a certain race or national origin can get.</p> <p>I would like to know why it is that I am being a victim of racism? I have no control over the Humans that live in my area. I live in a very rural very cold part of the country and it happens to be very far north. How is this in any way my fault and why should I be penalized for not having a certain race living in my neighborhood. I understand that redlining is not lending in an area because of a certain race in that neighborhood but giving</p>

	<p>preferential rates in an area because of a certain race living in that neighborhood is the exact same thing and why the Fair Housing Act and the Equal Credit Opportunity Act exist to discourage the racism and things like this that make it difficult to get a loan. In 2021 when the justice department announced new initiatives to combat redlining Attorney General Merrick B. Garland said “Lending discrimination runs counter to fundamental promises of our economic system” and I agree. I have a high credit score and I pay my bills on time or early but because I am an American of Italian decent and live in a predominately white area I am not allowed to get a reduced rate through Key bank and in fact I would have to use a rate that is nearly 4% or more higher, That is in no way fair housing or equal credit opportunity! My first step to remediate this is writing this email. I understand I can make a complaint to ComplaintsOffice10@hud.gov within 1 year of today. My next steps will completely depend on the response I get from you.</p> <p>Sincerely,</p> <p>██████████</p>
High Risk Language	Allegation of discrimination
Client’s Desired Resolution	Received reduced interest rate
Current status of the complaint from the client’s perspective?	Pending response
Preliminary Research and Feedback from KBM Complaints	<p>LO had mentioned the 3% off their interest rate program we are starting in March to this borrower. After pitching the client she noticed that the Minority/Majority was not above 50% it was a 11.3% and told the borrower that their home would not qualify for this anymore.</p> <p><u>Preliminary proposed response:</u></p> <p>Dear ██████████</p> <p>Thank you for reaching out to express your concerns about the collateral eligibility requirements for our new Key Opportunities Home Equity Loan. Key is offering this Special Purpose Credit Program to our clients whose home (collateral) are in low income or moderate income census tracts and are in majority minority census tracts as defined by the Federal Financial Institution Examination Council (FFIEC). Special Purpose Credit Programs are permitted within Regulation B under section 1002.8.</p> <p>To learn more about Special Purpose Credit Programs, you can access the following recent Blog post on the Consumer Financial</p>

Protection Bureau (CFPB)

website. <https://www.consumerfinance.gov/about-us/blog/using-special-purpose-credit-programs-to-serve-unmet-credit-needs>

Thank you again for your inquiry and we look forward to serving you in the future

Requested From Executive Client Relations



KeyBank
Enterprise Client Relations
127 Public Square
Cleveland, OH 44114

May 4, 2023

[REDACTED]
[REDACTED]
[REDACTED]

RE: Key Opportunities Home Equity Loan “the Loan”
[REDACTED]
Key Case No. 2EKJRE

Dear [REDACTED]:

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

Regarding your concerns about reaching out to express your frustrations with the collateral eligibility requirements for our new Key Opportunities Home Equity Loan, Key is offering a Special Purpose Credit Program to our clients whose homes (collateral) are located in low income or moderate-income census tracts and are in majority minority census tracts as defined by the Federal Financial Institution Examination Council (FFIEC). Special Purpose Credit Programs are permitted within Regulation B under section 1002.8.

To learn more about Special Purpose Credit Programs, you can access the following recent Blog post on the Consumer Financial Protection Bureau (CFPB) website:

<https://www.consumerfinance.gov/about-us/blog/using-special-purpose-credit-programs-to-serve-unmet-credit-needs>

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

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

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

Sincerely,


██████████

Enterprise Client Relations
Office of the President

High-Risk: ECR - goes to next state in 33 hours - Assigned to [CLF] ECR Team NEW

 0/10



May 19, 2023 at 4:40 PM EST 
[0 subscribers](#)

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

Profile

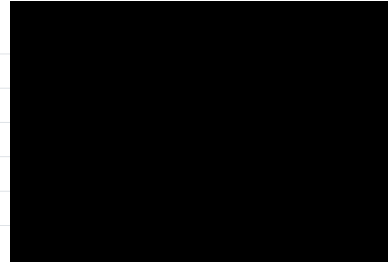
Customer Information

- Business Platform
- Channel Type (Online Banking / Mobile App / KeyNavigator)
- Consumer Digital Unit
- CUSTOMER ID
- Digital Intro text
- Individual or Organization
- P3 Flag
- Session Length
- Transaction Status
- Digital NPS
- Business Checking Flag
- Business Credit Card Flag
- Client Age
- Customer DNS Election
- Customer Type
- Digital Platform
- KeyCashFlow Flag
- Language
- Positive Pay Flag
- Primacy Flag
- Primary RM Code
- RDC Flag
- Transaction Count
- Transaction Time
- Transaction Time
- Email
- Investable Asset Level
- Transaction Date (ET)
- Transaction ID
- Digital 3b Flag
- Tenure
- Tenure Text
- Customer ID
- Business Segment
- Transaction Description
- Transaction Event Code
- Primary RM Name








Metadata Information

- Response Date (ET)
- Survey ID
- IPI
- Customer IPI
- Transaction ID
- Unit
- Survey Program



Activity

-  **Alert Assigned**
05/19/2023, 4:45:03 PM EST · System Generated
Automatically assigned to [CLF] ECR Team
-  **Alert Assigned**
05/19/2023, 4:45:03 PM EST · System Generated
Automatically assigned to [CLF] ECR Team
-  **Alert status set to New**
05/19/2023, 4:45:03 PM EST · System Generated
-  **Alert status set to New**
05/19/2023, 4:45:03 PM EST · System Generated
-  **Alert Created: High-Risk: ECR**
05/19/2023, 4:44:14 PM EST · System Generated
High-Risk: ECR

[View Less](#) ^

Score Report

Net Promoter Scores

Digital NPS  0

Digital

Digital NPS  0

Did you experience any problems?

Channel Type (Online Banking / Mobile App / KeyNavigator)

Overall Digital Satisfaction  5

Satisfaction with Speed  6

Satisfaction with Accessibility  5

Satisfaction with Ease of Navigating  5

Satisfaction with Appearance  6

Satisfaction with Understanding Features  6

Individual or Organization


Satisfaction with Range of Services  6

Recall using KeyBank's Digital Banking

Satisfaction with Information Clarity  6

Ease of Doing Business (KeyBank Online)  5

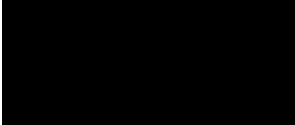
Verbatims

 Please tell us the reasons for your rating.
I do not want to bank at a large institution that treats customers so shabbily in smaller communities where it has a branch. The folks there (bank manager and financial advisor person) did not act in the best interest of their customer and some of what they did over a multi-year period bordered on or was actually illegal by law. So, I am waiting to move the account.



KeyBank
Enterprise Client Relations
127 Public Square
Cleveland, OH 44114

July 27, 2023



RE: [REDACTED]
Key Case No. 2FJCWF

Dear [REDACTED]

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

We have been unable to reach you by phone to further discuss your concerns. Please reach out to us at the number listed below if your concerns persist.

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.

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

Sincerely,



Enterprise Client Relations
Office of the President



May 24, 2023 at 11:09 AM EST ☆

[0 subscribers](#)

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

Profile

Customer Information

Email	[REDACTED]
Browser Language	[REDACTED]
City	[REDACTED]
Device	[REDACTED]
Digital Survey	[REDACTED]
Origin Type	[REDACTED]
Region	[REDACTED]
Client Name	[REDACTED]

Metadata Information

Response Date (ET)	[REDACTED]
Survey ID	[REDACTED]
IPI	[REDACTED]
Unit	[REDACTED]

Activity

- Note Added**
05/25/2023, 5:23:10 PM EST - [REDACTED] Customer Advocacy Team
ecr
- Alert Assigned**
05/25/2023, 5:23:06 PM EST - [REDACTED] Customer Advocacy Team
Assigned to [CLF] ECR Team by [REDACTED]
Message:
client accusing Key of redlining?
- Alert Assigned**
05/25/2023, 5:22:28 PM EST - [REDACTED] Customer Advocacy Team
Assigned to [REDACTED]
- Alert Assigned**
05/25/2023, 9:09:08 AM EST - [REDACTED] Customer Advocacy Team
Assigned to [REDACTED]
- Alert Assigned**
05/24/2023, 11:37:11 AM EST - System Generated
Automatically assigned to [CLF] Customer Advocacy Team
- Alert status set to New**
05/24/2023, 11:37:11 AM EST - System Generated
- Alert Created: KBO - Feedback**
05/24/2023, 11:34:22 AM EST - System Generated
KBO - Feedback

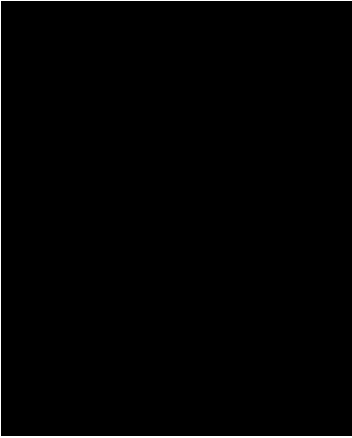
[View Less](#) ^

Score Report

Digital Satisfaction



Custom Parameters



Verbatims



Reason for Score Comment

I've been planning on moving some money out of my USAA account into a bank with higher interest rates, so your 4% account caught my eye. But your redlining means NO. So you will remain my small local bank with diverse tellers.



KeyBank
Enterprise Client Relations
127 Public Square
Cleveland, OH 44114

August 29, 2023

[REDACTED]
[REDACTED]
[REDACTED]

RE: Key Case No. 2FL92L

Dear [REDACTED]

This letter is in response to your issue expressed via a recent survey. We regret the frustrating experience you've had and would like to share the results of our investigation.

In review of your concerns, we want to assure you that we are a responsible bank and a responsible citizen; we understand that we have both the opportunity and the obligation to serve every stakeholder – our clients, colleagues, shareholders, and communities. Additionally, KeyBank's lending decisions are applied consistently to all potential borrowers and are based on predetermined criteria in accordance with fair lending laws. Any decision to deny an applicant is based solely on the financial information and data associated with the applicant.

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 prohibiting discrimination. KeyBank does not discriminate against individuals based on age, race, color, religion, national origin, sex, sexual orientation, veteran status, disability, marital status, familial status (e.g., family size or childbearing intentions), receipt of public assistance income or any exercise of rights under the Consumer Credit Protection Act.

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

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]

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

ACCOUNT INFORMATION

CASE SUMMARY

SOURCE OF COMPLAINT

Social Media

SLA DUE DATE

07/31/2023

IS THERE A CRITICAL DEADLINE FOR THIS CONCERN? *

Yes No

CLIENT CONCERN SYNOPSIS

Was unable to speak to the client. Client states that KeyBank does not provide full account services to the poor. States that it is our policy not to cash a check if it is more than is in the account unless it is a KeyBank check. She states that she is down voting all of our branches and branches and will post all the Washington branches on google, Craigslist, Bitchute and other social media outlets. She will expose our discriminatory practices to the public but to the embarrassment at the [redacted] Branch due to the check cashing issue.

SUMMARY OF THE ISSUE IN THE CLIENT'S WORDS

Key Bank discriminates against the poor, they will not provide you with full banking services based on the amount of money in your account. I am going to let everyone know how you discriminate against the poor. Your policy is to not cash a client's check, if it is larger than the amount they have in their account, unless it is a KeyBank check. This is discrimination and I am in the process of downvoting all your Key Bank branches on Google reviews and in my review I am letting everyone know how classist this company is, which won't be received very well in 2023 climate. After I am done with all your WA branches on Google I will move on to other States and then adds on Craigslist, my Bitchute channel and my other social media outlets. I will expose KeyBank and their discriminatory practices to the public for the utter embarrassment I received at Lakewood KeyBank branch when I could not cash a check because I am too poor and was told to go to a check cashing place after I have been a cus

DOES CLIENT AGREE TO BE CONTACTED BY PHONE? *

Yes No Client requests written response



KeyBank
Enterprise Client Relations
127 Public Square
Cleveland, OH 44114

December 13, 2023

RE: [REDACTED]
Key Case No. 2G2KY5

Dear [REDACTED]

This letter is in response to your issue regarding your complaint regarding the KeyBank check cashing policy and allegation of discrimination. We regret the frustrating experience you have had and would like to share the results of our investigation.


Our review found that per our check availability policy, KeyBank may limit the dollar amount of check cashing. Your checks could not be cashed because you did not have enough funds in your account to cover them. You were advised that our system would place a hold on this checks if deposited, and that we do in certain situations, have authority to override any holds that may occur when negotiating checks. However, the checks would not be available the same day. KeyBank is happy to meet with you offer advise of how to avoid this in the further. We were unable to find any errors within our check availability policy or how it was followed.

At KeyBank, we are 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 prohibiting discrimination. KeyBank does not discriminate against individuals based on age, race, color, religion, national origin, sex, sexual orientation, veteran status, disability, marital status, familial status (e.g., family size or childbearing intentions), receipt of public assistance income or any exercise of rights under the Consumer Credit Protection Act.

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

Attachments
Deposit Account Agreement and Funds Availability Policy