

The Department of Finance



Reinvestment Review Committee Eligible Depository Designation



2012 - 2013

Division of Treasury

Bank Evaluations & Recommendations





Table of Contents

- Executive Summary Page 3
- Bank Evaluations Page 5
- Final Scores, Rankings, and Recommendations Page 8



Executive Summary

In accordance with Chapter 178 of the Codified Ordinances of the City of Cleveland, a Request for Proposal (RFP) was issued for banking services. Through this RFP, the City will: 1) designate depositories who are eligible to receive all or a portion of the City's active deposits for the 2012-2013 calendar years; and 2) identify those who can offer comprehensive banking services at the most competitive rates. These services include, but are not limited to:

- Deposit Processing / Vault Services
- Wire Transfers
- Information Reporting
- Lockbox Services
- Investment Support Services (Safekeeping)
- Automated Clearing House (ACH) Services

The Finance Department's Treasury Division received RFP responses from the following nine banks:

- Charter One Bank
- Fifth Third Bank
- First Merit Bank
- Huntington Bank
- KeyBank
- Ohio Savings Bank
- PNC Bank
- US Bank
- Wells Fargo Bank



Executive Summary (continued)

The Director of Finance may designate one or more banks after an evaluation of their policies and practices regarding:

- Loans to low and moderate income City residents
- Loans to businesses
- Loans to minority business enterprises
- Neighborhood development
- Housing
- Economic development

The interest rates paid on deposits, fees and service charges, convenience of branch locations, the financial stability of each bank, and other such data or information deemed relevant by the Director of Finance is also considered.

This review consists of the following components:

- Bank Evaluations
- Final Scores, Rankings, and Recommendations



Bank Evaluations

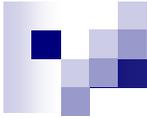
The Evaluation Team performed a qualitative and quantitative analysis of each bank assigning a rating of 1-5 (5 being the highest) for the following categories:

Qualitative analysis

- Quality of services and ability to meet City specifications
- Experience

Quantitative analysis

- Proposed Fees
- Earnings Rates



Bank Evaluations

Qualitative Analysis

Quality of Services and Ability to Meet City Specifications

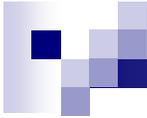
Rating 1-5 (5 being the highest)

	CHARTER ONE	FIFTH THIRD	FIRST MERIT	HUNTINGTON (HNB)	KEYBANK	OHIO SAVINGS	PNC	US BANK	WELLS FARGO
Compliance with requirements of the RFP and quality of proposal	3.00	3.75	3.00	3.50	4.00	4.00	3.50	2.50	3.00
Understanding of the needs and operating requirements of the City	3.00	4.00	3.00	4.00	5.00	3.50	3.50	2.50	3.00
Adequacy of financial controls and protection against loss	3.00	4.00	3.00	4.50	5.00	3.00	4.00	3.00	3.00
Technical ability and customized services	3.00	3.00	3.00	4.50	5.00	3.50	4.00	3.50	4.00
The convenience of the location	4.50	4.75	2.50	3.50	4.75	2.50	5.00	4.00	2.50
Financial stability of the bank	3.50	3.50	3.00	3.00	3.50	2.50	3.50	3.50	3.50
Ability to collateralize deposits	5.00	5.00	4.00	2.50	5.00	4.50	5.00	5.00	4.00
The value of any new product or service suggestions	3.00	4.50	3.50	0.00	5.00	2.50	4.00	3.50	4.00
Average:	3.50	4.06	3.13	3.19	4.66	3.25	4.06	3.44	3.38

Experience

Rating 1-5 (5 being the highest)

Banks relevant experience managing similar public account relationships	3.50	4.00	4.00	5.00	5.00	3.00	3.50	3.50	3.00
Experience and qualifications of the individuals assigned to this account	4.50	5.00	5.00	5.00	5.00	2.50	4.00	4.00	2.50
Average:	4.00	4.50	4.50	5.00	5.00	2.75	3.75	3.75	2.75



Bank Evaluations

Quantitative Analysis

Proposed Fees and Compensation

Rating 1-5 (5 being the highest)

The following factors were considered:

- Service charges / fees
- Bank terms or conditions
- Active deposits interest rates

RFP Reference	Major Service(s) Include:	CHARTER ONE	FIFTH THIRD	FIRST MERIT	HUNTINGTON (HNB)	KEYBANK	OHIO SAVINGS	PNC	US BANK	WELLS FARGO
4.1	General Banking	3.50	3.00	3.75	3.00	5.00	2.00	3.50	4.00	2.50
4.2	Deposit Processing / Vault Services	3.50	2.00	3.00	4.00	4.50	1.00	3.00	3.00	3.50
4.3	Wire Transfers	3.50	2.50	3.50	4.50	4.75	2.50	4.25	3.50	4.25
4.4	ACH Services	3.00	4.00	3.00	4.50	4.75	1.50	4.00	2.50	5.00
4.5	Daylight Overdrafts	4.00	4.00	3.00	5.00	5.00	5.00	5.00	4.00	3.00
4.6	Controlled Disbursement	2.50	3.50	-	4.75	5.00	4.00	4.50	4.00	3.00
4.7	Account Reconciliation Processing (ARP)	3.50	3.50	-	4.50	4.50	2.50	4.50	4.00	4.00
4.8	Information Reporting	3.00	3.50	2.00	5.00	4.00	2.75	3.75	3.75	4.50
4.9	BAI2 Reporting	3.00	2.00	2.00	3.00	4.50	2.00	5.00	1.50	2.00
4.10	Investment Support Services (Safekeeping)	2.00	3.00	-	2.00	5.00	-	-	1.50	1.00
4.11	Sweep Accounts	4.00	3.00	2.00	3.00	4.50	3.00	4.50	-	1.00
4.12	Processing and Tracking of Meter Collections	-	-	-	2.00	5.00	1.50	3.00	2.00	2.50
4.13	Image Cash Letter (Remote Deposit)	4.00	4.50	3.00	4.50	5.00	3.00	4.50	4.00	5.00
4.14	Return Check Processing	2.00	3.25	2.50	5.00	4.00	1.00	1.50	2.50	3.50
4.15	Lockbox Services	2.50	3.50	3.00	4.50	5.00	4.00	4.00	4.50	3.00
Average:		2.93	3.02	2.05	3.95	4.70	2.38	3.67	2.98	3.18



Final Scores, Rankings, and Recommendations

Upon completion of the evaluation process a score was calculated and a weight assigned resulting in final bank rankings and recommendations for each bid schedule.

Quantitative analysis

- Proposed Fees and Earnings Rates:

Weight

40%

Qualitative analysis

- Quality of services/ability to meet City specifications:
- Experience:

35%

25%

Final Scores, Rankings, and Recommendations

Final Score Summary



Rank	Bank	Score
1	KeyBank	4.76
2	Huntington Bank	3.95
3	PNC Bank	3.83
4	Fifth Third Bank	3.75
5	Charter One Bank	3.40
6	US Bank	3.33
7	Wells Fargo Bank	3.14
8	First Merit Bank	3.04
9	Ohio Savings Bank	2.78

Final Scores, Rankings, and Recommendations

Primary Operations



Primary Operations	Current Provider	Recommended Provider
Division of Taxation (CCA)	KeyBank	KeyBank
General Fund 1 ¹	KeyBank	KeyBank
Parking	KeyBank	KeyBank
Airports	KeyBank	KeyBank
Safekeeping	PNC Bank	KeyBank
Water	PNC Bank	PNC Bank
Water Pollution Agency (WPA)	PNC Bank	PNC Bank
General Fund 2 ²	PNC Bank	PNC Bank
Cleveland Public Power (CPP)	Huntington Bank	Huntington Bank
Payroll	Huntington Bank	Huntington Bank
House of Corrections	Huntington Bank	Huntington Bank

¹ **General Fund 1 - Primary commingled deposit account.**

² **General Fund 2 - Vendor warrant processing account.**

Final Scores, Rankings, and Recommendations

CRA Deposit Recommendations



Rank *	Bank	Score
1	Fifth Third Bank	95
2	KeyBank	87
3	US Bank	80
4	Huntington Bank	77
5	First Merit Bank	77
6	PNC Bank	60
7	Charter One Bank	58

** Rankings provided by the Department of Community Development*

Final Scores, Rankings, and Recommendations

Account Relationships



Depository Bank	Recommended Account Relationship
KeyBank	Primary Operations and CRA Deposits
Huntington	Primary Operations and CRA Deposits
PNC	Primary Operations and CRA Deposits
Fifth Third	Primary Operations (Alternate) and CRA Deposits
Charter One	CRA Deposits
US Bank	CRA Deposits
First Merit	CRA Deposits

**City of Cleveland Department of Community Development
Community Reinvestment Review Committee Report
2010 CRA Evaluations & Recommendations For The Public Funds CRA Deposits**

Introduction

The City of Cleveland's Neighborhood Reinvestment (CRA) Program began in 1991, at a time when financial institutions were withdrawing or reducing their investment in urban areas. The intent of the program was to utilize the federal Community Reinvestment Act to secure commitments from local institutions to increase their investment in the city's neighborhoods in order to leverage additional private investment.

Since the inception of the program, and the city's focus on neighborhood redevelopment, the investment pattern by banks has been reversed, and banks are stronger participants in meeting the city's credit needs. The series of CRA agreements between the city and local banks, coupled with the local community revitalization structure, has increased investment in neighborhoods throughout the city. The city has refined the program to better meet the credit needs of the city's residents and businesses. The financial and economic collapse tests the approaches to maintain or increase the credit and investments by local institutions.

In 2010, the City of Cleveland's CRA program and its banking services ordinance was recognized by the National Community Reinvestment Coalition (NCRC) as a *national best practice* for a local banking services ordinance. Last year, the NCRC published, *How Cities Can Pursue Responsible Banking: Model City Ordinance to Create Community Reinvestment Requirements For Depository Institutions*, which replicates the City of Cleveland's Banking Services Ordinance.

Since 2009, CRA staff has been asked for advice by organizations and representatives of the cities of Chicago, Los Angeles, Boston, Pittsburgh and New York which are in various stages of implementing and introducing policies and or ordinances that replicate the City of Cleveland's, CRA program and ordinance.

I. Enhancements to the CRA Program

The City of Cleveland has continuously endeavored to strengthen the framework for encouraging banks to lend and invest in the City. Since 2008, the following components of the CRA program were modified and successfully implemented:

1. Streamlined the annual collection of lending data from depository banks in electronic format consistent with City of Cleveland's Depository Ordinance.
2. Negotiated 4 year lending and investment goals for 2008-2011 consistent with bank and economic financial projections. (See Attachment 1).
3. Tracked annual branch & ATM closings & openings; It is noteworthy that in 2010, for the first time in 15 years, more bank branches closed than opened across the United States¹. However,

¹ New York Times, Bank Closings Tilt Toward Poor Areas, By NELSON D. SCHWARTZ, February 22, 2011.

<http://www.nytimes.com/2011/02/23/business/23banks.html?pagewanted=all>

in Cleveland, between 2008 and 2011 the number of branches among our depository banks has remained stable. In fact, in 2011, Fifth Third Bank built and opened two new branches, Key bank built 2 new branches and US bank built a new branch. All of the new branches were located in low or moderate income census tracts in the City of Cleveland.

4. Reinstated the development and publication of the annual consumer Mortgage and Repair Bulletins of products and services offered by depository banks, non-depository banks, non-profit organizations and the City of Cleveland. In 2011 over 35 organizations participated in the bulletins, which are available on line and marketed by LIVECleveland. They are available at: <http://www.livecleveland.org/sites/livecleveland/images/collateral/mortgageBulletin2011.pdf>.
5. Required all depository banks to provide a designated local contact for REO property maintenance, disposition, demolition and /or donations. We also had banks provide updated REO lists and or web based access to REO maintenance.
6. Scheduled regular and ongoing meetings with depository banks to discuss:
 - Their commitment to maintain their branch and ATM distribution
 - Trends in CRA lending and investing, including underwriting standards, FICO scores and debit to income ratios for home purchase or repair loans; and,
 - Development of competitive CRA mortgage & repair products.
7. Redefined and collected more detailed reporting of community development loans & investments. In 2009, the CRA program began requesting annual lending reports that include CD investments and CD loans by statistical planning areas (SPA), the investment amount, partners, (including non-profits organizations and CDFI's) and a project description. Examples include, letters of credit, lending through community and economic development corporations, making fixed capital investments such as low income tax credits and new market tax credits that support economic development and housing development in low mod census tracts. (See Attachment 2)

Summary of the Requirements of the Community Reinvestment Questionnaire

Pursuant to Chapter 178 of the City of Cleveland Codified Ordinances, on Banking Services, the City reviews banking and investment performance as part of making depository decisions. The City issued the *Community Reinvestment Questionnaire* (QRC), which was Appendix D to the 2011 City of Cleveland Banking Services RFP. The QRC required information explaining the banks' lending and investments in the City. Responses to the QRC were submitted by the institutions in Table 1.

Table 1.

Institution	Currently A City of Cleveland Depository Y/N
Charter One	Yes
First Merit	Yes
Fifth Third	Yes
Huntington Bank	Yes
Key Bank	Yes

New York Community Bank/ OSB ²	No
PNC	Yes
US Bank	Yes
Wells Fargo	No

Below is a summary and analysis of the lending data and the narrative information that each respondent submitted in response to the CRQ³: The responses were reviewed pursuant to the requirements of Chapter 178, including the below requirements.

Any depository desiring designation as an eligible depository shall submit to the Director of Finance the following information needed for evaluation of policies and practices regarding housing and economic development of such depository:

1. Residential lending information;
2. Commercial lending information;
3. The most recent annual report;
4. A statement **with timetable(s)** describing current and proposed initiatives to address the credit needs of the city, its residents and businesses, including low and moderate income and minority residents, **in the following categories**:
 - a. Home purchase mortgage loans;
 - b. Mortgage loans to operators of small rental properties;
 - c. Home improvement loans;
 - d. Small personal loans;
 - e. Consumer products and services;
 - f. Products for MBE, FBE, and SBE or CSB'
 - g. Participation in City-sponsored neighborhood projects;
 - h. Equitable contributions to CDC's;
 - i. Provision of full service banking in City neighborhoods;
 - j. Marketing loan products in low income and minority neighborhoods;
 - k. Goals established for service and production levels for target zones identified in j. above.

II. Evaluation Methodology & Results

Based upon the legislative requirements in Chapter 178, each of the *existing* depository institutions were evaluated on the four sections of the QRC which includes the following categories of lending performance, investment, banking services and employment:

1. Lending Performance;
 - (a) The percentage of total lending performance by lending and investment categories (2008-2010) as compared to their to lending & investment categories goals set for (2008-2011) and;
 - (b) The percentage of total aggregate lending 2008-2010 (three years) as compared to their total aggregate lending goals 2008-2011. (see Attachment 1)
2. The narrative responses that describe their lending services and investments identified in items a-k above

² New York Community Bank acquired Ohio Savings Bank in December 2009.

³ Appendix 2 includes a copy of the QRC evaluation form that was used to evaluate the score each of the institutions.

3. Their branch distribution in low & moderate neighborhoods including the number of branches opened and the number of branches closed in low and moderate census tracts and;
4. Their percentage of employment of minorities and females in executive level positions in Cleveland offices and branches.

Evaluation Results For A. Section I: Lending & Investment Of Existing Depository Bank Respondents

Following the 2008 Community Reinvestment Review Committee's selection of eligible depository banks, and pursuant to the City of Cleveland's Banking Services section 178.05, the Department of Community Development negotiated lending goals for 2008-2011 with the depository banks; Charter One, First Merit, Fifth Third, Huntington Bank, Key Bank, PNC and US Bank.

The table below summarizes actual aggregate lending reported⁴ by existing depository banks in lending and investment categories reported for 2008-2010 as compared to their aggregate annual target goals. While individual bank performance ranged from 58.13% to 124.13%, as a group the aggregate percent of actual reported aggregate lending for 2008-2010 represents 95.22% of the aggregate lending goals for 2008-2011.

Table 2

Bank	2008-2011 Total Proposed Lending Goal (000)	2008-2010 Actual lending (000)	% of 4 year Goals Met (000)
Charter One	165,000	95,907	58.13%
First Merit	112,568	84,696	75.24%
Fifth Third	176,750	219,407	124.13%
Huntington	218,000	200,257	91.86%
Key	432,350	502,709	116.27%
PNC ⁵	399,000	350,984	87.97%
US	290,000	253,967	87.57%
Total	1,793,668	1,707,927	95.22%

For evaluation of the existing depository institution's lending performance, each one, with the exception of PNC⁶, was evaluated and scored based upon two (2) rating scales, each scale has a total of 30 possible points for a total of 60 points. The two scales are described below.

1. Scale 1: In the first scale, points were assigned to the percentage of actual lending for 2008-2010 compared to their performance of their 4 year goals (2008-2011), by category of lending.

⁴ This report does not include Consumer Loans or Home Equity Loans unless the lender reports them as they are not required to be reported by regulators.

⁵ PNC's (6) year total aggregate goal from 2005-2010 is 800,00,000. = 133 MM per year x 3 = 399,000,000.

⁶ PNC was not evaluated under the performance of actual lending v. goals in the six loan categories as they did not negotiate goals by category. In 2005 they made a 6 year commitment to lend an aggregate of 800 MM in total lending for a six year period or 133 MM per year between 2005 and 2010. PNC's lending performance was evaluated based upon their 2008-2010 percentage of goals met based upon a total goal amount of 399 MM (133 MM x 3 years) as compared to their actual lending for the same three year period.

Table 3.

% of actual 3 year lending compared to 4 yr goals met for the six categories of loans evaluated (total points 30)	Points 1-5
75% and above	5 points
70-74%	4 points
65-69%	3 points
64-60%	2 points
59% & below	1 point

Please note that maximum number of points are assigned to scores of 75% and above based on 3 year lending performance compared to four year goals. The fourth year's lending for 2011 will not be reported until 2012. The six lending categories scored in scale 1 were:

- Mortgage purchase
- Home Improvement
- Refinance
- Small Business
- CD Investments⁷ and;
- CD Loans⁸

The following provides for each existing depository bank, their total percentage of four year goals reached in three years for these six categories. For the total amount of lending in these categories for 2008 through 2010 as well as their percentage of performance towards their lending goals, see Attachment 1. Lending for 2011 lending will not be available until 2012.

Bank	Home Purchase	Home Improvement	Refinance	Small Business	CD Loans	CD Investments	Total points
Charter One	70.59%	65.30%	59.78%	42.99%	16.12%	39.17%	16
Fifth Third	77.44%	52.05%	157.58%	97.13%	90.03%	198.78%	26
First Merit	103.28%	37.92%	52.70%	13.67%	223.30%	138.29%	18
Huntington	45.48%	32.90%	65.83%	54.93%	288.58%	178.84%	16
Key Bank	66.38%	22.67%	50.06%	40.79%	89.17%	1377.59%	16
NC/PNC ⁹	NA	NA	NA	NA	NA	NA	0
US Bank	47.77%	25.33%	61.40%	66.00%	61.31%	421.40%	14

⁷ Community Development Loans defined as (1) Affordable housing including multi-family rental housing for low-moderate income individuals; (2) Community services targeted to low or moderate income individuals; (3) activities that promote economic development by financing businesses with less than 150 employees or have gross annual revenues of 1 million dollars or less; or (4) Activities that revitalize or stabilize low or moderate income geographies. O not report home mortgage, small business or consumer loans except multi family affordable housing loans as they are reported on previous pages.

⁸ Community Development Investments defined as COMMUNITY DEVELOPMENT INVESTMENT: Includes direct investments, letters of credit and or lending through community and economic development corporations which bring commercial and housing development projects in the City of Cleveland to fruition through special underwriting and significant capital, equity and gap financing. Examples include fixed capital investments such as micro funds, intermediary lenders, credit unions, low income tax credits, new market tax credits, and financing to support new housing construction projects. See Part 4 Community Development Investments; Office of the Comptroller of the Currency Administrator of National Banks

⁹ PNC acquired National City Corporation in 2008. PNC did not provide goals by lending category. For this review, the City used the annual average of aggregate lending based upon their aggregate lending goal of 800 MM for 6 years, or an aggregate goal of 133 MM per year and 399 MM for the 3 year period of 2008-2010.

2. Scale 2: In the second scale, 1-5 points are assigned based on the percentage of total actual lending in all categories (2008-2010) versus goals in aggregate for all categories 2008-2011 (30 points possible). Table 4 indicates the result of the second scale.

Table 4.

% of total actual aggregate lending v. total aggregate lending goals (30 points total)	Score
100% & higher	30
80-99%	24
60-79%	18
40-59%	12
20-39%	6

Based upon the (2) scales described above, Table 5 indicates the scores that the existing depository institutions received, out of a total of 60 possible points.

Table 5.

Institution	Total Points for 2008-2010 performance by loan category	Total points for 2008-2010 performance by aggregate lending	Total Points
Charter One	16	12	28
Fifth Third	26	30	56
First Merit	18	18	36
Huntington	16	24	40
Key Bank	16	30	46
US Bank	14	24	38
PNC	0	24	24

(B) Lending & Investment of Non-Depository Bank Respondents. There were two Institutions that responded to the CRQ that had not previously applied for depository designation. The two are New York Community Bank and Wells Fargo. Each of their proposals were reviewed and the results are presented below

1. New York Community Bank, OSB

The following table provides a summary of the total 2010 lending information that was submitted by New York Community Bank in response to the CRQ.

Table 6.

New York Community Bank /OSB 2010 Lending By Category	Total Amount of Loans or Investments Originated in 2010
Home Purchase	512,000
Refinance	2,518,000
Home Improvement	48,000
Home Equity	0
Multi-Family 5 units or more	0
Non-Occupant Loan 1-4 units	0
Small Business Loans	188,000
Community Development Loans	2,000
Community Development Investments ¹⁰	1,562,000
Total 2010 lending Reported	4,830,000

Because there were no goals to compare the lending of NYCB/OSB its lending information was scored based upon its total loans and investments made in the City of Cleveland in 2010 as compared to the total amount of deposits in their City of Cleveland branches in 2010, expressed their loan to deposit ratio. The following table provides the total amount of deposits in the (4) New York Community Bank/OSB branches located in Cleveland. That total was 443,607 MM. The ratio of loans to deposits for 2010 is 1.09%.

Table 7.

FDIC Summary of Deposit Branch Report June 30,2010 for NYCB/OSB	
Location	Amt: (000)
3300 Warren Road	66,474
1866 West 25th Street	17,693
1801 East Ninth Street ¹¹	336,518
13109 Shaker Square	22,922
Total Amt of Deposits in Cleveland	443,607
Total amount of reported 2010 lending & investment In City of Cleveland	4,830
Ratio of loans to deposits	1.09%

¹⁰ Community Development Investments & Loans include aggregate wholesale lending of MBS in LM census tracts or to LM income individuals.

¹¹ The Shaker Square Branch was closed December 2010.

The following evaluation methodology was applied to evaluate the total lending reported by NYCB/OSB.

30 points: 7% and higher loan to deposit ratio
20 points: 4-6.99 % loan to deposit ratio
10 points: 2- 3.99-% loan to deposit ratio
5 points: 1.99% and lower

Based upon the loan to deposit ratio of NYCB/OSB of 1.09%, a total score of 5 points was assigned to them. Other CRA considerations evaluated for NYCB/OSB included the closure of the Shaker Square branch in December, 2010 despite formal written objections from the City of Cleveland, City of Shaker Heights and neighborhood stakeholders. In March of 2011, the City of Cleveland submitted a formal CRA Public Challenge Letter¹² to the FDIC regarding it's CRA performance based upon the following:

In addition to the lending and investment of New York Community Bank, other CRA considerations evaluated include:

New York Community Bank closed their Shaker Square branch in December 2010, despite formal written objections from the City of Cleveland, City of Shaker Heights and neighborhood stakeholders. In March of 2011, the City of Cleveland submitted a formal CRA Public Challenge Letter¹³ to the FDIC regarding it's CRA performance based upon the following:

- The Mayor of the City of Cleveland opposed the closing of the branch in the Shaker Square neighborhood. In June of 2010, this branch reported a total of \$22,922,000 in deposits. It was located at the highly visible corner of Larchmere and N. Moreland Blvd. Closing the branch resulted in the loss of a full service savings and loan bank with the only drive up ATM branch in the low and moderate income neighborhood with a 58.20% minority population and which has densely populated, public transit oriented trade area an census tract.
- City Cleveland City Council adopted Resolution R 1369 on October 18, 2010 opposing the proposed December 10, 2010 closing of this Ohio Savings Bank branch.
- Within the Metropolitan Statistical Planning Area (MSA) of Cleveland, Elyria and Mentor, NYCB ranks as the second largest FDIC savings bank with 1.94 billion dollars in deposits and 3.87% market share. Based on the FDIC data, NYCB /OSB had sufficient depository dollars in place to support the Shaker Square branch.
- Among the (3) contiguous census tracts of the Shaker Larch mere Branch, Ohio Savings now NYCB made only one loan which was to a white upper income male in 2008, and made no loans in 2009.
- Requested the FDIC monitor and conduct an annual review and reporting of NYCB's lending and investment in the City of Cleveland until their next CRA exam in 2013.

In response to City's CRA challenge, representatives of NYCB/OSB met in April 2011 with City of Cleveland Community Development Director and staff and provided information that included the following:

- NYCB/OSB undertook efforts to maintain the Shaker Square branch but was unable to renegotiate a reasonable renewal of the lease.

¹² Available at: <http://www.organizeohio.org/fair-lending-coalition.html> (last accessed 10/18/11).

¹³ Available at: <http://www.organizeohio.org/fair-lending-coalition.html> (last accessed 10/18/11)

- NYCB/OSB acquired the 18 story former AMTRUST headquarter building on east ninth street and pays annual real estate taxes in excess of 1 million dollars; of which 139K is paid to the City of Cleveland.
- NYCB/OSB employs (April of 2011) 796 persons in its downtown facility and has an annual payroll of 47.2 MM for employees in the City of Cleveland.
- Announced the opening of a new ATM in the Fairhill Community Center
- Since December of 2010, Organize Ohio and Ohio Fair Lending Coalition convened over 20 planning and community meetings with representatives from City of Cleveland, residents, business owners, federal, state and local elected officials, representatives of NYCB/OSB and the FDIC to address the disinvestment of NYCB/OSB in Cleveland.
- The meetings have resulted in significant press coverage¹⁴ and letters of support from elected officials including, Mayor of Shaker Heights, US representative Marcia Fudge and State Senator Nina Turner.
- The FDIC had advised community stakeholders at the August public meeting that the CRA evaluation for NYCB/OSB would be released by the end of summer however to date it has not yet been released.

2. Wells Fargo

Wells Fargo has no branch or ATM distribution or employees in Cleveland or Cuyahoga County. As a result of not having any branches, they are not subject to CRA evaluation by the OCC for the Cleveland MSA. In response to the CRQ lending tables, they provided total aggregate lending for the State of Ohio. Their response to the QRC was not responsive, therefore they were not evaluated.

It should also be noted that on June 8, 2011, the Obama Administration released its May housing scorecard report¹⁵. In it, Wells Fargo is included as one of four loan servicers found to be in need of *substantial improvement* under the Making Home Affordable Program. As a result, beginning this month, the Treasury Department is withholding financial incentives for Wells Fargo along with Bank of America, and J.P Morgan Chase Bank. In July the Board of Governors for the Federal Reserve Bank assessed an \$85 million civil money penalty against Wells Fargo & Company of San Francisco, a registered bank holding company, and Wells Fargo Financial, Inc., of Des Moines to address alleged steering of borrowers into high-cost, subprime loans.¹⁶

B. Section II. Narrative Responses to the QRC

Section 178.05 requests that institutions provide information on products and services that are designed and marketed to meet the credit needs of the City's residents and businesses. Section 178.05 also provides flexibility to request additional information required to evaluate respondents. All respondents to the QRC were evaluated based upon their narrative responses to the following questions. (See Handout No.2 for summary of respondent's narrative responses)

The underlined items (numbers 1 through 4 and items 9 and 10), identify information requested in this year's QRC and were not requested in the 2007 banking services RFP. A total of 28 points were

¹⁴ New York Times, Next Teller Please (2.4) miles Away - February 22, 2011 Neighborhood Voice,, Cleveland Plain Dealer Sun Press- March 30, 2011;Cleveland Plain Dealer Sun Press- April 15, 2011;Cleveland Plain Dealer Sun Press- April 22, 2011;Sun Press Article April 29,2011 ;Closed bank donates to new Shaker Heights non-profit group; <http://www.organizeohio.org/fair-lending-coalition.html> (last accessed 10/18/11)

¹⁵ <http://www.makinghomeaffordable.gov/news/latest/Pages/Obama-Administration-Releases-May-Housing-Scorecard-Featuring-New-Making-Home-Affordable-Servicer-Assessments.aspx> (last accessed 10/12/11).

¹⁶ <http://www.federalreserve.gov/newsevents/press/enforcement/20110720a.htm> (last assessed 10/21/11).

designated for this section. The evaluation designated (2) points for each (unless otherwise noted) for responses to the following:

1. Disposition of vacant abandoned property/Including policy on reimbursement to local municipalities for board ups/demo
2. Reo contact person identified
3. Provided input on participation in Philanthropic Commitments to the City of Cleveland Department of Aging's Economic Security Project (ESP) for senior citizens;
4. Provided input on participation in Capital Investment Pool for community development projects
5. Current & proposed innovative initiatives to address credit needs of city, its residents, and businesses including LMI and minority residents in following categories: home purchase loans, new construction loans for rehab or purchase rehab, mortgage loans
6. Current & proposed innovative initiatives to address credit needs of city, its residents, and businesses including LMI and minority residents in following categories: mortgage loans to non-occupant borrowers for small rental properties; home improvement loans; small personal loans.
7. Provides range of products& services for under-unbanked consumers including youth, elderly; commercial loans products including products targeted to FBE, SBE, MBE's' .
8. Participation in City Sponsored Neighborhood Dev Programs & consortia: Equitable contributions to community based Non-profit Org and or CDFI's;
9. Participates in the City of Cleveland's Annual Consumer Mortgage & Repair Bulletins (3 bonus points)
10. Institution has designated CRA officer that serves City of Cleveland (3 bonus points)

Based upon the responses provided by the institutions, up to two (2) points were assigned for each response .The following table provides the total score assigned to each of the institution's responses to Section II of the QRC.

Table 8.

Institution	Section II. Total Score
Charter One	20
Fifth Third	26
First Merit	28
Huntington	28
Key Bank	28
NYCB	23
US Bank	26
PNC	25
Wells Fargo	0

C. Section III. Evaluation of Neighborhood Branches Distribution

The proposals were evaluated to determine branch distribution especially in low and moderate census tracts. Despite the national trend of banks closing branches in low and moderate income census tracts¹⁷, between 2008 and 2011 the total number of branches of existing depository banks in Cleveland has remained stable. Table 9 below provides an analysis of branches for each existing depository bank from 2008-2011.

¹⁷ New York Times, Next Teller Please (2.4) miles Away, 2/22/2011.

Table 9.

Depository Bank Branch Distribution 2008-2011				
Bank	Total Branches 2008	Total Branches 2009	Total Branches 2010	Total branches 2011
Charter One	18	15	15	15
Fifth Third	6	6	6	8
First Merit	3	3	3	3
Huntington	8	7	8	9
Key Bank	17	15	17	19
PNC	17	17	17	17
US Bank	15	15	15	14
Total	84	78	81	85

Each respondent was evaluated based upon the number of branches opened and or closed between 2010-2011. For this category (3) points were awarded for each branch opened in a low and or moderate income census tract and (3) points were deducted if a branch is closed in a low and or moderate income census tract between 2008-2010 as explained below:

- The points assigned for each new branch opened in a low and or mod income census tract is 3 points; and if there was no change, 1 point was assigned.
- The points assigned to score each branch closed in low and or moderate income census tract is 3 points deducted per branch closed; and if no change 1 point was assigned.
- The scoring also evaluated each respondents' *branch closing policy and notice to the City*. We awarded higher points for respondents that provide the earliest notice of 120 days, which provides the City with opportunity to assess any impact of loss of banking services and the opportunity to respond appropriately; Branch closing policy with 120 days notice to city (3 points); Branch closing policy with 90 days notice to city (2 points); Branch closing policy with 60 days notice to city (1 point)¹⁸; Branch closing policy with less; than 60 days notice (0 points).

The following table provides the scores awarded to each institution based upon their branch activity and distribution between January 1, 2010 and 2011.

Table 10.

Institution	Total number of points assigned for each new branch opened in Low and or Moderate income CT or no change 2010-2011	Total number of points for branches closed in low and or moderate income LM CT or no change 2010-2011	Points for Branch Closing Policy/Notice To City	Total Score
Charter One	1	1	3	5
Fifth Third	6	1	2	9

¹⁸ The FDIC requires 60 day minimum notice requirement to customers for branch closing notice.

First Merit	1	1	3	5
Huntington	3	1	3	7
Key Bank	9	-3	3	9
NYCB	1	-3	3	1
PNC	1	1	3	5
US Bank	6	-3	3	6
Well Fargo ¹⁹	NA	NA	NA	NA

4. Section IV. EMPLOYMENT (10 Total Possible Points)

Pursuant to Section 178.05 all respondents to the QRC were requested to submit the total number of senior management positions as defined by Chapter 178 employed in the City of Cleveland offices and branches and total number of minorities and females employed within those positions. Table 11 below provides the results of each respondent's score based upon their employment of minorities and females in executive level positions.

The number of points were assigned based upon a review of the EEOC's 2009 national report on job patterns for minorities and women in executive, senior level officials, managers and mid-level managers²⁰ in finance and insurance as well as comparison to the reported employment of women and minorities in similar positions reported by respondents. The following table provides the scoring for the respondents.

Table 11.

Institution	Total number of managers, loan officers, senior management or board of trustee members in Cleveland Offices and branches.	Ratio of minority loan officers, senior mgmt, bd of trustees in Cleveland branches or offices; 20 % and higher (5) points 15--19% 3 points Below 14%- 1 point	Ratio of female loan officers, senior mgmt, bd of trustees in Cleveland branches or offices: 40-50% - 5 points 30-39% - 3 points below 30% -1 point	Total Points
Charter One	74	9 = 8.2% = score of 1	41= 55.4% = score of 5	6
Fifth Third	40	3 = 7% = score of 1	12 = 30% = score of 3	4
First Merit	45	13 = 28% = score of 5	15= 33.3% = score of 3	8
Huntington	23	1 = 4.3% =score of 1	5 = 21% = score of 1	2
Key Bank	508	68 = 13%= score of 1	186 =37% = score of 3	4
NYCB	19	2 = 10.5% =score of 1	3 = 15.7% = score of 1	2
PNC	596	54 = 11.03% = score of 1	265 = 44.46% = score of 5	6
US Bank	91	20 = 21.97 % =score of 5	38 = 41.76% =score of 5	10
Wells Fargo ²¹	0	na	na	na

¹⁹ Wells Fargo has no branches in the City of Cleveland

²⁰ 2009 Job Patterns For Minorities And Women In Private Industry (EEO-1) 2009 EEO-1 National Aggregate Report in insurance and finance. http://www1.eeoc.gov/eeoc/statistics/employment/jobpat-eeo1/2009/index.cfm#select_label

²¹ Wells Fargo reported no employees in the City of Cleveland.

3. Final Scoring & Ranking

Table 12 provides the total scoring and ranking for each institution based on its lending and investment, narrative responses, branch distribution and employment. The table lists categories utilized for scoring for each institution based on its performance:

1. Lending and investment
 - (a) percent of its actual lending and investment as compared to its goals by loan category
 - (b) percent of its actual aggregate lending and investment compared to its aggregate goals
2. Narrative responses
3. Branch distribution and;
4. Employment of minorities and females in executive level positions in Cleveland offices & branches and total scorings and rankings.

Table 12.

SCORING & RANKINGS BASED UPON 2011 APPENDIX D- COMMUNITY REINVESTMENT QUESTIONNAIRE							
Institution	Lending & Investment Scores- (30 points possible) (see notes no. 3 & 6 below for scoring scales)	Lending & Investment Score based upon percentage of total actual lending (2008-2010) v goals in aggregate for all categories 2008-2011 (30 points possible) see note no. 4 below for scoring scale)	Community Reinvestment Questionnaire Score (28 possible points) pages 18-22 of the Community Reinvestment Questionnaire)	Branch Distribution Score: 3 points for each branch opened in a LM CT; 3 points deducted for each branch closed in a LM CT; 1 point no change	Employment Of Minorities & Women in Executive level Positions In Cleveland Offices/Branches Score: (10 points) (see note no. 5 below for scoring scale)	Total Score	Ranking
Charter One	16	12	20	5	6	58	7
First Merit	18	18	28	5	8	77	4
Fifth Third	26	30	26	9	4	95	1
Huntington	16	24	28	7	2	77	4
Key Bank	16	30	28	9	4	87	2
PNC	0	24	25	5	6	60	6
NYCB (see note 6)	5	0	23	1	2	31	8
US Bank	16	24	26	6	10	80	3
Wells Fargo	0	0	0	0	0	0	9

Recommendations:

Based upon the final scores, the following institutions as ranked are recommended for consideration for CRA deposits.

Institution	Final Score	Ranking	Recommended For CRA Deposits Y/N
Fifth Third	95	1st	Y
Key Bank	87	2nd	Y
US Bank	80	3rd	Y
First Merit	77	4th	Y
Huntington	77	4th	Y
PNC	60	6th	Y
Charter One	58	7th	Y
New York Community Bank/OSB	31	8th	No
Wells Fargo	0	9th	No

III. Recommendations For New Community Reinvestment Initiative Agreements 2012-2015 With Depository Lenders

A. Compliance With Existing Provisions of the Banking Services Ordinance Will Continue

Following the Community Reinvestment Review Committee’s approval of the depository institutions, the Department of Community Development will negotiate new community reinvestment initiative goals for each institution. Pursuant to the provisions of Chapter 178, Banking Services Ordinance, the new goals will continue to require reporting of the following lending categories:

Home Purchase loans 1-4 units
Refinance of Home Purchase loans
Home Improvement residential Mortgages
Residential Mortgage Home Equity Loans
Commercial & industrial term loans originated w/ revenues under 5 MM
Residential mortgages –non occupant loans 1-4 family units
Consumer loans
Community Development loans /Investments including loans on Multi-family dwellings of 5 units or more

The Department of Community Development will continue annual data collection and reporting requirements of Chapter 178 that includes the following non-lending information;

Statement w/ timetables describing current and proposed initiatives to address credit needs of City residents, businesses in categories of:

- A. Home purchase mortgage loans
- B. Loans to non occupant borrowers for small rental properties
- C. Home improvement loans
- D. Small personal loans, consumer products & services
- E. Consumer product(s) and service(s).
- F. Commercial loan product(s) for small businesses, minority business enterprises and female business

enterprises.

G. Participation in City-sponsored neighborhood development programs and consortiums.

H. Equitable contributions to community based non-profit organizations in the City.

I. Provision of full service banking in City neighborhoods.

J. Program to market loan products and services throughout the City to include (1) low and moderate income neighborhoods, (2) minority neighborhoods, (3) small business (4) minority business enterprises and (5) female business enterprises.

B. Recommendations For New Provisions for Inclusion in The CRA Program

The Department of Community Development will continue to work with banks on the on the development and marketing of CRA lending products for purchase, repair small business and consumer loan products that include;

Purchase and Rehabilitation Loans. Through FHA 203(k) or a comparable loan product, this mortgage loan program will allow a borrower to purchase or refinance a home and include the cost of repairs and improvements in one mortgage.

Business Line of Credit. To qualify for this designation, the transaction must include each of the following elements: available to businesses less than two years old; no annual fee; payments only due when the line is accessed; interest rates no greater than prime plus 2%; unsecured; line of credit between \$10,000 and 100,000 .

Reduced Equity Loans. To qualify for this designation, the transaction must include each of the following elements: loan between \$10,000 and \$100,000; equity requirement less than 20%; interest rates no greater than prime plus 2%.

Loans for Start Up Businesses. To qualify for this designation, the transaction must include each of the following elements: loan of \$10,000 or greater; available to businesses less than two years old; interest rates no greater than prime plus 4%.

C. Potential New CRA Reporting & Scoring Criteria

Loan Modifications. Identify the total number of modifications of distressed loans, with subcategory numbers for the following types of modifications: mortgage interest rate reductions, principal reductions, repayment plans in which the outstanding loan amount increases, modifications executed under the Federal Home Affordable Modification Program, modifications executed under another federal program, and modifications executed under the institution's own modification program, and includes.

- The bank or financial institution implements a policy that allows unemployed borrowers to qualify for home loan modifications based upon unemployment insurance and:
- The bank or financial institution allows tenants in homes subject to foreclosure to continue to rent the properties until they are sold.

Defaults and delinquencies on home loans: Identify the total number of defaults and delinquencies resulting in foreclosures, number of evictions filed and the financial institution's policies on foreclosure activities, including interactions with the occupants of the property and any actions taken to evict or otherwise displace them

Student Loans. Identify the total number of student loans defined as a loan that is secured for the purpose of financing or refinancing a student's attendance at any degree-granting educational institution authorized by law to provide a program of education beyond high school level, made by, or

on behalf of such an institution or financial institution and includes reporting of the total number of student loan deferments, modifications and defaults.

Foreclosed Vacant/Abandoned Residential Property. Identify the total number of foreclosed residential properties in the depository's inventory, with subcategory numbers for: properties in foreclosure longer than two years from foreclosure complaint filing date; properties in foreclosure longer than one year from the foreclosure complaint filing date; transfers of the depository's interest in foreclosed properties to nonprofits or land banks; depository-funded demolitions of foreclosed properties; and reimbursement amounts paid to local governments for costs incurred due to demolition or board ups of properties foreclosed upon by the depository.

Branches and Deposits. Identify the total number of branches, ATMs, and number and dollar amount of deposits for the entire City, and for each Statistical Planning Area.

Participation in a Capital Pool for Community Development Lending and Investing. Over the past year we have been exploring the interest from depository lenders to participate in a neighborhood development capital investment pool with the goal to increase potential debt capital investments in qualified community development financial institutions (CDFI'S) for disposition of troubled assets including (1) foreclosures in a lending institutions CRA real estate development portfolio; (2) disposition of 1-4 family unit REO properties and or other troubled assets.

In the response to the 2011 Community Reinvestment Questionnaire as part of the 2011 Banking Services RFP, all of our existing depository lenders stated affirmatively that they are interested in exploring various roles in a capital investment pool including how they would evaluate and commit to participation in a neighborhood development capital pool;

Affirmative Action. Identify the number of minorities, females, and City residents employed by the depository as loan officers and as members of its board of directors and senior management staff.

Philanthropic Goals Consistent with Each Lender's Philanthropic Strategic Plan

A bank's philanthropic commitments should be consistent with community needs and documented in a philanthropic strategic plan. In the 2011 Community Reinvestment Questionnaire as part of the 2011 Banking Services RFP, respondents were requested to submit a 2010 -2011 report that details their participation, sponsorship and funding of various financial literacy programs and organizations and were asked whether they would consider participating in the City of Cleveland's Department of Aging Economic Security project. The following lenders stated affirmatively that they were interested in supporting the project; Charter One, Fifth Third, First Merit, Huntington, Key, PNC and US Bank and New York Community Bank, DBA Ohio Savings.

IV. Conclusion

In light of the evolving economic challenges facing urban areas and inherent needs in community development lending by our depository institutions is critical. It is important to continue to develop and support the CRA program and to maintain compliance with the provisions of the Community Reinvestment provisions of the banking services ordinance. This will ensure that the program remains viable and responsive to the lending, credit and service needs of the City of Cleveland residents and business owners.

Attachment 1

Community Reinvestment Lending Goals 2008-2011 & Actual Lending 2008-2010

**Community Reinvestment Initiative Lending Goals 2008-2011 &
Actual Lending 2008-2010**

Bank: Charter One	2008-2011 Proposed Goal (000)	2008 Actual (000)	2009 Actual (000)	2010 Actual (000)	2008- 2010 total (000)	Percent of 2008-2011 Goal Met (000)
Home Purchase	12,000	3,859	2,227	2,385	8,471	70.59%
Home Improvement	6,000	1,029	1,240	1,649	3,918	65.30%
Refinance	12,000	1,623	2,283	3,267	7,173	59.78%
Consumer/HELOC	32,000	5,377	3,332	5,048	13,757	42.99%
Small Business Loans	48,000	19,363	20,855	8,787	49,005	102.09%
Community Development Loans /inc multi-family	40,000	-	6,447		6,447	16.12%
Community Development Investments	15,000	996	4,880		5,876	39.17%
Non-Occupant-1-4 units	NA	703	131	426	1,260	NA
Multi-Family 5 units or more	NA	-	-	-	-	-
Totals	165,000	32,950	41,395	21,562	95,907	58.13%
Bank: First Merit						
Bank: First Merit	2008-2011 Proposed Goal (000)	2008 Actual (000)	2009 Actual (000)	2010 Actual (2010)	2008- 2010 total (000)	Percent of 2008-2011 Goal Met
*Home Purchase	5,544	838	3,865	1,023	5,726	103.28%
** Home Improvement	944	223	131	4	358	37.92%
Refinance	5,228	637	933	1,185	2,755	52.70%
*** Consumer	28,916	13,629	11,846	13,714	39,189	135.53%
HELOC	NA	NA	NA	NA	NA	NA
Small Business Loans	55,936	6,046	608	992	7,646	13.67%
Community Development Loans inc multi-family	4,000	250	6,891	1,791	8,932	223.30%
Community Development Investments	12,000	-		16,595	16,595	138.29%
Non-Occupant-1-4 units	-	-	445	50	495	0.00%
multi-family 5 units or more	-	-	-	3,000	3,000	0.00%
Totals	112,568	21,623	24,719	38,354	84,696	75.24%
*2000-2004 goals for home purchase & refinance were combined						
** Includes HELOC home improvement loans secured by real estate						
*** Consumer loans includes credit cards, motor vehicle, secured and unsecured personal loans						
Bank: Fifth Third						
Bank: Fifth Third	2008-2011 Proposed Goal (000)	2008 Actual (000)	2009 Actual (000)	2010 Actual (000)	2008- 2010 total (000)	Percent of 2008-2011 Goals Met
Home Purchase	25,000	6,303	5,324	7,732	19,359	77.44%
Home Improvement	9,500	1,184	673	3,088	4,945	52.05%
Refinance	12,000	5,835	7,706	5,368	18,909	157.58%
Consumer	9,750	13,818	13,326	14,139	41,283	423.42%
HELOC	10,500	2,275	2,158	3,720	8,153	77.65%
Small Business Loans	50,000	18,662	15,237	14,668	48,567	97.13%
Community Development Loans/inc. multifamily	40,000	12,200	11,653	12,158	36,011	90.03%
Community Development Investments	20,000	12,285	11,848	15,623	39,756	198.78%
Non-Occupant-1-4 units	NA	1,747	677	-	2,424	NA
Multi-Family 5 units or more	NA				-	-
Totals	176,750	74,309	68,602	76,496	219,407	124.13%
Bank: Huntington						
Bank: Huntington	2008-2011 Proposed Goal (000)	2008 Actual (000)	2009 Actual (000)	2010 Actual (000)	2008- 2010 total (000)	Percent of 2008-2011 Goals Met
* Home Purchase	28,000	6,592	2,742	3400	12,734	45.48%
Home Improvement	6,000	1,475	306	193	1,974	32.90%
Refinance	24,000	5,322	4,163	6315	15,800	65.83%
**Consumer	18,000	8,594	759	754	10,107	56.15%
HELOC	na	-	4,748	5254	10,002	NA
Small Business Loans	109,000	38,000	7,607	14262	59,869	54.93%
Community Development Loans/inc multi-family	25,000	-	787	71343	72,130	288.52%
Community Development Investments	8,000	-	5,209	9098	14,307	178.84%
Non-Occupant-1-4 units	NA	2,070		1264	3,334	NA
Multi-Family 5 units or more	NA				-	NA
Totals	218,000	62,053	26,321	111,883	200,257	91.86%
* Includes Home improvement loans 2003-2006						
** consumer loans & HELOC combined						

Bank: Key Bank	2008-2011 Proposed Goal (000)	2008 Actual (000)	2009 Actual (000)	2010 Actual (000)	2008- 2010 total (000)	Percent of 2008-2011 Goals Met
Purchase	50,000	8,972	12,090	12,127	33,189	66.38%
Home Improvement	27,564	3,056	1,725	1,468	6,249	22.67%
Refinance	12,000	2,899	2,104	1,004	6,007	50.06%
Consumer	-	-	-	-	-	na
HELOC	27,786	na	-	-	NA	na
Small Business Loans	150,000	26,079	18,138	16,963	61,180	40.79%
Community Development Loans	150,000	46,803	43,023	43,922	133,748	89.17%
Community Development Investments	15,000	10,502	90,502	105,634	206,638	1377.59%
Non-Occupant-1-4 units (9/29/11 Key Bank is verifying this today)	NA	346	734	900	1,980	0.00%
5 units or more multifamily loans	NA	85	-	53,633	53,718	0.00%
Totals	432,350	98,742	168,316	235,651	502,709	116.27%
Key did not report HELOC or consumer loans 2008-2009						
Bank: NC/PNC	2008-2010 Proposed Annual Goal (000)	2008 Actual (000)	2009 Actual (000)	2010 Actual (000)	2008- 2010 total	*Percent of 2005-2010 Goals Met
Purchase		16,300	10,328	3,968	30,596	NA
Home Improvement		950	167	442	1,559	NA
Refinance		6,400	5,832	3,457	15,689	NA
Consumer		na	na	na	na	NA
HELOC		na	na	na	na	NA
Small Business Loans		38,761	16,744	124,425	179,930	NA
Community Development Loans		41,967	20,100	21,050	83,117	NA
Community Development Investments		2,800	15,131	17,763	35,694	NA
Non-Occupant-1-4 units		1,321	682	496	2,499	NA
multi-family loans 5 units or more		1,900	-	-	1,900	NA
totals	399,000	110,399	68,984	171,601	350,984	87.97%
*In 2005-NCB submitted commitment letter for term of 2005-2010 of 800 million or approx. 133.3 MM per yr.-no specific goals per lending category specified; PNC does not report consumer or HELOC loans 2009 -25.8 MM to MOCA for CD Loan & investments- 2008- NC/PNC issued a 25 mm letter of intent to City of Cleveland for NMTC in the City's CDE & Provided a 15 m NMTC -for 668 Euclid Dev.						
Bank: US Bank	2008-2011 Proposed Goal (000)	2008 Actual (000)	2009 Actual (000)	2010 Actual (000)	2008- 2010 total	Percent of 2008-2011 Goals Met
Purchase	80,000	20,692	5,324	12,199	38,215	47.77%
Home Improvement	4,000	433	333	247	1,013	25.33%
Refinance	20,000	2,985	4,134	5,160	12,279	61.40%
*Consumer	75,000	22,656	27,769	17,899	68,324	91.10%
HELOC	-	-	3,320	2,098	5,418	NA
Small Business Loans	65,000	12,012	19,451	11,438	42,901	66.00%
Community Development Loans/finc multi-family	30,000	6,733	-	11,660	18,393	61.31%
Community Development Investments	16,000	16,491	44,620	6,313	67,424	421.40%
Non-Occupant-1-4 units	-	-	-	-	0	NA
multi-family loans 5 units or more	-	-	-	-	0	NA
Totals	290,000	82,002	104,951	67,014	253,967	87.57%
*US Bank -consumer & HELOC are combined for each category except 2007: -2009 CD investments includes NMTC 39.8MM; LIHTC42.5 MM; 89 MM CD loan; US Bank2009 CD investments included their investment in Steel Yard Commons NMTC						
NOTES: Lending for 2011 will not be available until April of 2012 NA indicates that lender does not have lending goals for this category or is not required to report this category of loans under CRA reporting, e.g. consumer loans Source Documents: 2006,07,08, 09, 10 annual CRA reports submitted by lenders; and responses to 2011 Finance Banking Services RFP and includes adjusted lending totals for categories of CD investments & CD loans funded in 2010 through 2011. This report does not include consumer or HELOC loans unless the lender reports them as they are not required to be reported by regulators.						
FILE NAME: CRI_Goals & Actual_2008-10 - CRA Update_10.25.11						

Attachment 2

Community Development Lending & Investments
2010-2011

CHARTER ONE 2010-2011 COMMUNITY DEVELOPMENT LOANS/INVESTMENTS*

CD LOAN (Y/N)	CD INVESTMENT (Y/N)	ACTIVITY & Statistical Planning Area	AMOUNT (000)	Identify any non-profit partner(s) including CDFI's and CDC's	Description of project & include any multi-year commitment or other commitments/goals.
					Thank you for giving us this opportunity to respond. We have community development loans and investments on the books that have carried over from previous years, but nothing that originated in 2010-2011. It has been a quiet year while we've been restructuring. We just announced our new Director of Community Investment in Ohio and we are finalizing a new Community Development Lending Group.
TOTAL CLEVELAND		TOTAL	0		

*COMMUNITY DEVELOPMENT LOANS (1) AFFORDABLE HOUSING (INCLUDING MULTI-FAMILY RENTAL HOUSING) FOR LOW - OR MODERATE - INCOME INDIVIDUALS; (2) COMMUNITY SERVICES TARGETED TO LOW - OR MODERATE - INCOME INDIVIDUALS; (3) ACTIVITIES THAT PROMOTE ECONOMIC DEVELOPMENT BY FINANCING BUSINESSES WITH OR LESS EMPLOYEES OR HAVE GROSS ANNUAL REVENUES OF \$1 MILLION OR LESS; OR (4) ACTIVITIES THAT REVITALIZE OR, STABILIZE LOW - OR MODERATE - INCOME GEOGRAPHIES. DO NOT REPORT HOME MORTGAGE, SMALL BUSINESS OR CONSUMER LOANS EXCEPT MULTI-FAMILY AFFORDABLE HOUSING LOANS AS THEY ARE REPORTED ON PREVIOUS PAGES. COMMUNITY DEVELOPMENT INVESTMENT: Includes direct investments, letters of credit and or lending through community and economic development corporations which bring commercial and housing development projects in the City of Cleveland to fruition through special underwriting and significant capital, equity and gap financing. Examples include fixed capital investments such as microfunds, intermediary lenders, credit unions, low income tax credits, new market tax credits, and financing to support new housing construction projects. See Part 4 Community Development Investments; Office of the Comptroller of the Currency Administrator of National Banks.

Fifth Third 2010-2011 COMMUNITY DEVELOPMENT LOANS/INVESTMENTS*

CD LOAN (Y/N)	CD INVESTMENT (Y/N)	ACTIVITY & Statistical Planning Area	AMOUNT (000)	Identify any non-profit partner(s) including CDFI's and CDC's	Description of project & include any multi-year commitment or other commitments/goals.
NO	YES	1161.00	250,000.00		ShoreBank Certificate of Deposit
NO	YES	Multiple locations	2,701,837.00		Fifth Third CDC Direct Investments in the following projects: Glenville Homes II LP and Kirby Manor NHT.
NO	YES	Multiple locations	2,882,225.00		Fifth Third CDC Indirect Fund Investments in the following funds: Enterprise Social Investment Corporation (ESIC), McDonald 1996 and Related XXVIII Fund.
NO	YES		5,440,793.00		Cleveland NW Investment Fund, LLC
NO	YES		877,292.00		MWV Pinnacle Fund - New venture capital fund to invest in primarily minority start-up companies and existing businesses.
NO	YES	1036.00	6,400.00		Grant to Neighborhood Progress Inc for support of the "Model Blocks: A Vital Component of Comprehensive Neighborhood Strategy" Project
YES	NO	1079.00	1,100,000.00		Bedo Management. Renewal of revolving line of credit for construction cost on a commercial building located in the Central neighborhood. This rehab helped to stabilize a LIM tract and provided new jobs through the addition of several commercial retailers. This project received Federal and State Historic Tax credits
YES	NO	1086.00	2,750,000.00		Coleman Spohn Corp. Renewal of Line of credit to support increased growth in company. One of three minority owned businesses in the Greater Cleveland, this company has created new jobs (particularly for minority workers) and provided economic revitalization in this moderate-income census area.
YES	NO	1113.00	250,000.00		Comm. Steel. Renewal of loan to create and keep jobs for Cleveland Union workers and stabilize the low-income St. Clair Superior neighborhood.
YES	NO	1018.00	1,000,000.00		Emerald Development and Economic Network. Renewal of line of credit that supports the Shelter Plus Care Program. This program administers over 1300 rent subsidies to low-income persons and families and supports over 225 units of housing used by severely mentally disabled individuals, families and elderly in Cuyahoga County.
YES	NO	1099.00	5,000,000.00		Hillcrest Egg & Cheese Company. Renewal of loan. This company helps to stabilize the neighborhood and provides jobs for low and moderate-income workers.
YES	NO	1078.00	1,000,000.00		Mental Health Services. Renewal of line of credit to provide gap funding for payments from government agencies for services provided to homeless individuals in the city of Cleveland.
YES	NO	1078.00	3,906,000.00		Mental Health Services. New loan to pay of CRE loan for facility used as the headquarters for agency that provides services to homeless individuals. This building renovation also helped stabilize a moderate-income census tract located in downtown Cleveland.
YES	NO	1116.00	61,534.00		The Islamic Association. Renewal of loan to nonprofit religious group originally made to rehab building where services such as "Helping Hands Hot Meals" and "Free Lunch Day Camp Program" are provided to low-income families and children in the St. Clair Superior neighborhood.
YES	NO	1215.00	555,964.00		Zion Pentacostal Church of Christ. Renewal of loan to purchase vacant building for use by the church to provide community outreach services in 99% minority neighborhood.
TOTAL CLEVELAND		TOTAL	27,782,045.00		

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SEE: http://www.occ.gov/static/community-affairs/fact-sheets/Fact_sheet_CRA_loans.pdf May 2011. (Last Accessed 6.12.11)

Attach additional pages if necessary

First Merit Bank- 2010-2011 COMMUNITY DEVELOPMENT LOANS/INVESTMENTS*

CD LOAN (Y/N)	CD INVESTMENT (Y/N)	ACTIVITY & Statistical Planning Area	AMOUNT (000)	Identify any non-profit partner(s) including CDFI's and CDC's	Description of project & include any multi-year commitment or other commitments/goals.
Y	N	Detroit-Shoreway	10	Propriety Information	Vehicle loan to non-profit which provides permanent rental subsidies, temporary living assistance, and emergency rental assistance to low-income persons w/severe mental illnesses.
Y	N	Central	1500	Propriety Information	Fund construction of a 23 unit permanent supportive housing project utilizing Low Income Housing Tax Credits.
Y	N	Euclid Green	200	Propriety Information	Fund purchase of vehicles and equipment for non-profit that provides multiple group homes, therapy, and vocational services to metally and developmentally disabled individuals; supported primarily via Medicaid funding.
Y	N	Euclid Green	500	Propriety Information	Working capital line of credit used by a non-profit that provides multiple group homes, therapy, and vocational services to metally and developmentally disabled individuals; supported primarily via Medicaid funding.
Y	N	Euclid Green	2300	Propriety Information	Refinance of debt with Chase Bank and increase principle to support additional capital improvements. Organization is a non-profit that provides multiple group homes, therapy, and vocational services to metally and developmentally disabled individuals; supported primarily via Medicaid funding.
Y	N	University	8400	Propriety Information	Revitalize and stabilize a low-income census tract within the City of Cleveland in Cuyahoga County. Proceeds used for construction of mixed use development utilizing New Market Tax Credits.
Y	N	Downtown	5000	Propriety Information	Two-part project providing revitalization/stabilization and economic development to LMI geographies and people. Project qualified as community development under the HUD 108 Loan Guarantee Program which requires project to benefit LMI persons or aid in the prevention of slums.
N	Y	Glenville	252.7	Propriety Information	Deposits placed into CDFI - Balance as of 10/28/2010
N	Y	Kinsman	105.9	Propriety Information	Deposits placed into CDFI - Balance as of 12/31/2010
N	Y	City of Cleveland	80	Propriety Information	LIHTC Equity Fund Investment
N	Y	Downtown	15	Propriety Information	Non-Profit organization that allocates funds to other non-profit groups to support programs that assist the well being of the community. Stipulation letter targets contribution to benefit 75% LMI
N	Y	Central	2.5	Propriety Information	Social service agency that operates Peer Awareness Communication Training targeted to at-risk youth ages 11-15 and is focused on teaching life skills and positive decision making.
N	Y	Central	1	Propriety Information	Non- profit organization that provides a variety of social and health programs which are all targeted to LMI individuals and families.
N	Y	Ohio City	1.5	Propriety Information	CDC that provides low interest home improvement and rehab loans to LMI borrowers in City of Cleveland which is 97% LMI tracts.
N	Y	Goodrich-Kirtland Park	1.5	Propriety Information	Nationally based affiliate of a non-profit organization that provides emergency food, clothing and shelter to vicims of disasters such as fires, floods, etc. 58% of those served are considered LMI per 2010 documentation.
N	Y	City of Cleveland	0.25	Propriety Information	Non-profit organization that provides services to homeless individuals
N	Y	City of Cleveland	3	Propriety Information	Non-profit that provides food to LMI families and individuals
N	Y	City of Cleveland	0.15	Propriety Information	Non-profit Housing Development Corporation

First Merit Bank- 2010-2011 COMMUNITY DEVELOPMENT LOANS/INVESTMENTS*

CD LOAN (Y/N)	CD INVESTMENT (Y/N)	ACTIVITY & Statistical Planning Area	AMOUNT (000)	Identify any non-profit partner(s) including CDFI's and CDC's	Description of project & include any multi-year commitment or other commitments/goals.
N	Y	City of Cleveland	1	Propriety Information	Hispanic non-profit organization that provide health services to LMI families and individuals
N	Y	City of Cleveland	0.5	Propriety Information	Non-profit organization that provides housing assistance for homeless families and individuals
N	Y	City of Cleveland	0.3	Propriety Information	Non-profit employment and training organization for persons with developmental disabilities
N	Y	City of Cleveland	0.5	Propriety Information	Non-profit charter school serving LMI children
N	Y	City of Cleveland	0.5	Propriety Information	Educational support program for LMI children
N	Y	City of Cleveland	1.25	Propriety Information	non-profit civil rights organization that provides scholarships to LMI students
N	Y	City of Cleveland	0.42	Propriety Information	Non-profit provider of subsidized housing
N	Y	City of Cleveland	1	Propriety Information	Non-profit community development corporation
N	Y	City of Cleveland	1	Propriety Information	Non-profit child care services network
N	Y	City of Cleveland	5	Propriety Information	Non-profit employment and economic development organization
N	Y	City of Cleveland	1	Propriety Information	Non-profit housing organization
TOTAL CLEVELAND		TOTAL	18386		

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SEE: http://www.occ.gov/static/community-affairs/fact-sheets/Fact_sheet_CRA_loans.pdf May 2011. (Last Accessed 6.12.11)

Attach additional pages if necessary

Huntington Bank--2010-2011 COMMUNITY DEVELOPMENT LOANS/INVESTMENTS*

CD LOAN (Y/N)	CD INVESTMENT (Y/N)	ACTIVITY & Statistical Planning Area	AMOUNT (000)	Identify any non-profit partner(s) including CDFI's and CDC's *1	Description of project & include any multi-year commitment or other commitments/goals.
Y		Downtown	1,000	Non-Profit Borrower	Community Services to LMI Individuals
Y		Fairfax	30	Non-Profit Borrower	Community Services to LMI Individuals
Y		Goodrich-Kirtland Pk	9,100	For Profit Borrower	Revitalize and Stabilize an LMI Geography
Y		Goodrich-Kirtland Pk	50	CDFI	Community Services to LMI Individuals
Y		Ohio City	875	Non-Profit Borrower	Revitalize and Stabilize an LMI Geography
Y		Tremont	4,200	For Profit Borrower	Revitalize and Stabilize an LMI Geography
Y		Union-Miles Park	2,400	Non-Profit Borrower	Community Services to LMI Individuals
Y		Downtown	19,297	For Profit Borrower	Revitalize and Stabilize an LMI Geography
Y		Downtown	3,930	For Profit Borrower	Revitalize and Stabilize an LMI Geography
Y		Downtown	1,400	For Profit Borrower	Revitalize and Stabilize an LMI Geography
Y		Union-Miles Park	1,200	Non-Profit Borrower	Community Services to LMI Individuals/Affordable Housing for LMI Individuals
Y		Downtown	14,000	For Profit Borrower	Revitalize and Stabilize an LMI Geography
Y		Goodrich-Kirkland Park	1,000	For Profit Borrower	Revitalize and Stabilize an LMI Geography
Y		Goodrich-Kirkland Park	2,650	For Profit Borrower	Revitalize and Stabilize an LMI Geography
Y		Goodrich-Kirkland Park	8,711	For Profit Borrower	Revitalize and Stabilize an LMI Geography
Y		Ohio City	1,500	Non-Profit Borrower	Revitalize and Stabilize an LMI Geography
	Y	Central	200	Non-Profit Borrower	Affordable Housing for LMI Individuals
	Y	Kinsman	599	For Profit Borrower	Affordable Housing for LMI Individuals
	Y	Kinsman	4,980	For Profit Borrower	Revitalize and Stabilize an LMI Geography
	Y	Downtown	3,319	For Profit Borrower	Revitalize and Stabilize an LMI Geography
TOTAL CLEVELAND		TOTAL	80,441		

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1. Due to Privacy concerns, customer names have been withheld.

Attach additional pages if necessary

KEY Bank- 2010-2011 COMMUNITY DEVELOPMENT LOANS/INVESTMENTS*

CD LOAN (Y/N)	CD INVESTMENT (Y/N)	ACTIVITY & Statistical Planning Area	AMOUNT (000)	Identify any non-profit partner(s) including CDFI's and CDC's	Description of project & include any multi-year commitment or other commitments/goals.
Yes		Downtown - Revitalize	10,925.40		2 Loans
Yes		Fairfax - Revitalized	9,000.00		
Yes		Fairfax - Affordable Housing	4,950.00		
Yes		Goodrich-Kirkland - Affordable Housing	8,044.51		3 Loans
Yes		Hough - Affordable Housing	4,370.15		
Yes		South Broadway - Revitalize	1,237.50		
Yes		Tremont - Revitalize	575.00		
Yes		University - Revitalize	4,820.00		2 Loans
		Buckeye-Shaker LIHTC	\$2,010,962.00		
		Central - Real Estate Equity	\$109,233.91		
		Central - Real Estate Equity	\$57,347.80		
		Central - LIHTC	\$132,488.45		
		Central - NMTC	\$778,300.00		
		Central - HTC	\$10,000.00		
		Central - NMTC	\$39,525.69		
		Detroit-Shoreway - LIHTC	\$5,643.35		
		Downtown - Real Estate Equity	\$136,542.38		
		Downtown - Real Estate Equity	\$163,850.86		
		Downtown - Real Estate Equity	\$54,616.95		
		Downtown - Real Estate Equity	\$750,000.00		
		Downtown - NMTC	\$1,300,773.00		
		Downtown - Real Estate Equity	\$163,850.86		
		Downtown - NMTC	\$10,000.00		
		Downtown - NMTC	\$4,550,000.00		
		Downtown - Real Estate Equity	\$54,616.95		
		Downtown - Real Estate Equity	\$163,850.86		
		Downtown - Real Estate Equity	\$76,463.73		
		Downtown - Real Estate Equity	\$103,444.51		
		Downtown - Real Estate Equity	\$81,925.43		
		Downtown - NMTC	\$79,051.38		
		Downtown - NMTC	\$110,671.94		
		Downtown - LIHTC	\$7,999,941.00		
		Edgewater - LIHTC	\$44,306.91		
		Edgewater - LIHTC	\$221,534.54		
		Fairfax - LIHTC	\$14,448.80		
		Glenville - LIHTC	\$105,578.81		
		Glenville - LIHTC	\$35,192.94		
		Glenville - LIHTC	\$157,573.30		
		Glenville - LIHTC	\$3,363.14		
		Goodrich-Kirkland - LIHTC	\$38,102.17		
		Goodrich-Kirkland - LIHTC	\$25,566.02		
		Goodrich-Kirkland - LIHTC	\$25,351.73		
		Goodrich-Kirkland - LIHTC	\$141,310.59		
		Goodrich-Kirkland - LIHTC	\$100,779.71		

	Goodrich-Kirkland - LIHTC	\$375,421.26	
	Goodrich-Kirkland - LIHTC	\$110,020.84	
	Goodrich-Kirkland - LIHTC	\$251,660.13	
	Goodrich-Kirkland - LIHTC	\$22,004.17	
	Goodrich-Kirkland - LIHTC	\$50,332.03	
	Goodrich-Kirkland - LIHTC	\$691,784.00	
	Hough - LIHTC	\$285,026.87	
	Hough - LIHTC	\$57,005.37	
	Hough - LIHTC	\$806,149.00	
	Hough - LIHTC	\$6,565,062.00	
	Hough - LIHTC	\$70,831.13	
	Jefferson - LIHTC	\$380,000.00	
	Kinsman - LIHTC	\$3,213,353.00	
	Kinsman - Other Investments	\$100,000.00	
	Lee-Miles - LIHTC	\$136,297.77	
	Mount Pleasant - LIHTC	\$169,639.88	
	Mount Pleasant - LIHTC	\$19,762.08	
	N. Broadway - Real Estate Equity	\$60,078.65	
	N. Broadway - LIHTC	\$7,250,355.00	
	Ohio City - NMTC	\$3,251,781.00	
	South Broadway - LIHTC	\$506,422.00	
	South Broadway - LIHTC	\$1,028,001.00	
	St. Clair-Superior - LIHTC	\$1,878.37	
	St. Clair-Superior - LIHTC	\$429,281.93	
	Tremont - NMTC	\$9,206,931.00	
	Tremont - Real Estate Equity	\$396,406.12	38 Real Estate Equity Investments at different sites.
	Union-Miles - LIHTC	\$42,083.39	
	University - Real Estate Equity	\$163,850.86	
	University - Real Estate Equity	\$38,231.87	
	University - Real Estate Equity	\$72,094.38	
	Woodland Hills - LIHTC	\$9,101.71	
	LIHTC - scattered sites	\$75,501.86	2 investments
	BEI-SBIC	\$75,044.53	
	LIHTC - scattered sites	\$9,498,060.00	Scattered sites in Buckeye, Fairfax and Glenville
	LIHTC - scattered sites	\$4,461,251.00	Scattered sites in Detroit-Shoreway, Tremont, Broadway/Slavic Village area
	LIHTC - scattered sites	\$2,925,191.00	Scattered sites in Hough and Glenville
	NMTC - Scattered sites	\$612,648.22	8 Investments
	NMTC - Scattered sites	\$4,200,000.00	Shaker/Moreland area
	LIHTC - Equity Fund	\$3,866,517.25	20 Investments
	LIHTC - Equity Fund - Hough	\$164,342.16	
	LIHTC - Equity Fund - Stockyards	\$123,355.24	
	LIHTC - Equity Fund	\$2,840,764.32	3 Investments - scattered sites
	LIHTC - Equity Fund	\$223,447.99	8 Investments - scattered sites
	LIHTC - Equity Fund	\$30,625.04	Scattered sites
	Glenville - LIHTC - Equity Fund	\$34,958.57	Scattered sites
	Union-Miles LIHTC - Equity Fund	\$30,303.86	Scattered sites
	S. Broadway - LIHTC - Equity Fund	\$40,114.86	Scattered sites
	University - LIHTC - Equity Fund	\$32,809.50	Scattered sites
	Ohio City - LIHTC - Equity Fund	\$47,040.86	Scattered sites
	Hough - LIHTC	\$1,364,922.00	Scattered sites
	LIHTC - Equity Fund	\$1,492,497.00	Scattered sites

		Lee-Miles - Real Estate Equity	\$1,592,111.19		
		Business Equity Investment	\$150,539.06		
		LIHTC - Equity Fund	\$182,068.03		2 Investments
		Glennville - LIHTC - Equity Fund	\$175,906.57		Scattered sites
		Union-Miles - LIHTC - Equity Fund	\$152,484.71		Scattered sites
		Buckeye - LIHTC - Equity Fund	\$164,810.56		Scattered sites
		Hough - LIHTC - Equity Fund	\$104,256.78		Scattered sites
		Glennville - LIHTC - Equity Fund	\$146,380.67		Scattered sites
		S. Broadway - LIHTC - Equity Fund	\$401,148.56		
		University - LIHTC - Equity Fund	\$328,095.03		
		Ohio City - LIHTC - Equity Fund	\$235,204.28		
		Riverside - LIHTC - Equity Fund	\$355,203.76		
		LIHTC - Equity Fund	\$1,027,246.49		Scattered sites
		Real Estate Equity	\$130,531.28		Scattered sites
		LIHTC - Equity Fund	\$1,200,807.84		3 Investments - Scattered sites
		LIHTC - Equity Fund	\$2,416,871.64		2 Investments - Scattered sites
		Hough - LIHTC	\$8,667,665.00		
		Business Equity Investment	442,189.37		8 Investments
cd laons	105,634,792.57				
CD Loans	43,922.56				
TOTAL CLEVELAND	TOTAL		105,673,895.13		
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<small>SEE: http://www.occ.gov/static/community-affairs/fact-sheets/Fact_sheet_CRA_loans.pdf May 2011. (Last Accessed 6.12.11)</small>					
<small>Attach additional pages if necessary</small>					

New York Community Bank 2010-2011 COMMUNITY DEVELOPMENT LOANS/INVESTMENTS*

CD LOAN (Y/N)	CD INVESTMENT (Y/N)	ACTIVITY & Statistical Planning Area	AMOUNT (000)	Identify any non-profit partner(s) including CDFI's and CDC's	Description of project & include any multi-year commitment or other commitments/goals.
Y	N	DETROIT - SHOREWAY	2	Senior Housing Crime Prevention Foundation	Funds used to fund Senior Crime Stoppers programs for low-to-moderate income seniors residing in two senior housing facilities in Cuyahoga County, Ohio. Annual renewal for 7 years. Matures 2018.
N	Y	BROOKLYN-CENTRE	48		Various, FNMA, FHLMC, and GNMA CRA Targeted Mortgage-Backed Securities
N	Y	BUCKEYE - SHAKER	105		Various, FNMA, FHLMC, and GNMA CRA Targeted Mortgage-Backed Securities
N	Y	CLARK - FULTON	143		Various, FNMA, FHLMC, and GNMA CRA Targeted Mortgage-Backed Securities
N	Y	DETROIT - SHOREWAY	59		Various, FNMA, FHLMC, and GNMA CRA Targeted Mortgage-Backed Securities
N	Y	DETROIT - SHOREWAY	63		Various, FNMA, FHLMC, and GNMA CRA Targeted Mortgage-Backed Securities
N	Y	EDGEWATER	83		Various, FNMA, FHLMC, and GNMA CRA Targeted Mortgage-Backed Securities
N	Y	GLENVILLE	135		Various, FNMA, FHLMC, and GNMA CRA Targeted Mortgage-Backed Securities
N	Y	KAMM'S CORNERS	116		Various, FNMA, FHLMC, and GNMA CRA Targeted Mortgage-Backed Securities
N	Y	LEE - MILES	68		Various, FNMA, FHLMC, and GNMA CRA Targeted Mortgage-Backed Securities
N	Y	MT PLEASANT	90		Various, FNMA, FHLMC, and GNMA CRA Targeted Mortgage-Backed Securities
N	Y	OLD BROOKLYN	182		Various, FNMA, FHLMC, and GNMA CRA Targeted Mortgage-Backed Securities
N	Y	ST. CLAIR - SUPERIOR	157		Various, FNMA, FHLMC, and GNMA CRA Targeted Mortgage-Backed Securities
N	Y	TREMONT	53		Various, FNMA, FHLMC, and GNMA CRA Targeted Mortgage-Backed Securities
N	Y	UNIVERSITY	53		Various, FNMA, FHLMC, and GNMA CRA Targeted Mortgage-Backed Securities
N	Y	WEST BOULEVARD	206		Various, FNMA, FHLMC, and GNMA CRA Targeted Mortgage-Backed Securities
TOTAL CLEVELAND		TOTAL	1562		

*COMMUNITY DEVELOPMENT LOANS (1) AFFORDABLE HOUSING (INCLUDING MULTI-FAMILY RENTAL HOUSING) FOR LOW - OR MODERATE - INCOME INDIVIDUALS; (2) COMMUNITY SERVICES TARGETED TO LOW - OR MODERATE - INCOME INDIVIDUALS; (3) ACTIVITIES THAT PROMOTE ECONOMIC DEVELOPMENT BY FINANCING BUSINESSES WITH OR LESS EMPLOYEES OR HAVE GROSS ANNUAL REVENUES OF \$1 MILLION OR LESS; OR (4) ACTIVITIES THAT REVITALIZE OR, STABILIZE LOW - OR MODERATE - INCOME GEOGRAPHIES. DO NOT REPORT HOME MORTGAGE, SMALL BUSINESS OR CONSUMER LOANS EXCEPT MULTI-FAMILY AFFORDABLE HOUSING LOANS AS THEY ARE REPORTED ON PREVIOUS PAGES. COMMUNITY DEVELOPMENT INVESTMENT: Includes direct investments, letters of credit and or lending through community and economic development corporations which bring commercial and housing development projects in the City of Cleveland to fruition through special underwriting and significant capital, equity and gap financing. Examples include fixed capital investments such as microfunds, intermediary lenders, credit unions, low income tax credits, new market tax credits, and financing to support new housing construction projects. See Part 4 Community Development Investments; Office of the Comptroller of the Currency Administrator of National Banks.

SEE: http://www.occ.gov/static/community-affairs/fact-sheets/Fact_sheet_CRA_loans.pdf May 2011. (Last Accessed 6.12.11)

Attach additional pages if necessary

WELLS FARGO

No Community Development Lending & Investing
Reported For City of Cleveland

Eligible Depositories



The following banks have been designated as eligible depositories by the Director of Finance for the calendar years 2012 and 2013:

- **Charter One Bank**
- **Fifth Third Bank**
- **First Merit Bank**
- **Huntington Bank**
- **KeyBank**
- **PNC Bank**
- **US Bank**