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Customer: Stewart and 83rd

Stewart and 83rd: The customer feels that the automated systems is wrought with inadequacies that open the customer to identity theft. He says that it should not endanger us. Put that machine back in the HEB. You don’t have to open the office, nobody cares about that. I've heard you are building a new ATM today and if you move it out of the parking lot during the day after you moved the ATM, I was there by myself. There was a guy standing in the drive thru trying to get money out of the ATM and the machine was gone. Evidently someone had tried to break in or remove it. So, do the right thing and stop inconveniencing and endangering us. If you don't have time to get a new machine, I'll be happy to wait on others. If you don't have time to get a new machine, I'll be happy to wait on others.

Customer: Bedford Ave Branch

Customer: Bedfont Ave Branch: The customer added more precautions, but still feels that we should maybe have seating available for elders or people who have difficulty standing for a long time.

Customer: Gentilly Woods

Customer: Gentilly Woods: The customer felt the closest branch is four miles west and at this time no additional plans are in place. Customer began to speak about the population, that bankers are relocating, and the ATM is remaining in building. Advised we would document her concerns.

Customer: 92nd St.

Customer: 92nd St: Customer stated her local branch location (Bedford Ave Branch) is closing in August. The customer shared the community met with management. Informed the customer of improvements the branch is making to better customer experience.

Customer: Telephone Branch

Customer: Telephone Branch: The customer sent the follow up email regarding branch closure. He says he has misplaced the name and phone number of the woman who called from your office in response to this email, and I would still like to hear what, if anything, you plan to do about this matter. My wife and I have banked with Chase for a number of years and our relationship with Chase has been very positive from the beginning of next year. Advised that there are two branches in Nashua and one in Salem. The customer expressed his excitement, that bankers are relocating, and the ATM is remaining in building. Advised we would document her concerns.

Customer: Riverdale Main St.

Customer: Riverdale Main St: The customer made suggestions on the timing of the closure and wished JP Morgan Chase would reconsider the decision. The customer was upset to learn that the Staten Island Mall branch would not re-open. She states that she did not receive any communication regarding the closing other than what she read online. Advised both branches are full service and have ample ATM capacity.

Customer: Tuckahoe Main St.

Customer: Tuckahoe Main St. branch that was consolidated in 2019. Advised both branches are full service and have ample ATM capacity.

Customer: Glen Cove

Customer: Glen Cove: The customer stated that the branch was consolidated based on low and declining transaction and sales volumes, along with limited growth. The timing and period of time. Thanked the customer for her suggestion and advised that we will forward that back to the branch. Customer added that the transition will be seamless. The customer can use her account and also visit other branches.

Customer: Hartsdale Ave

Customer: Hartsdale Ave: Customer sent the follow up email regarding branch closure. He says he has misplaced the name and phone number of the woman who called from your office in response to this email, and I would still like to hear what, if anything, you plan to do about this matter. I am writing to follow up your last email and I really miss your feedback about adding more of Chase and keeping the amazing Chase. Continued if anything changes, that would be communicated.

Customer: Iselin

Customer: Iselin: The customer was upset to learn that the Iselin branch was closing in August. The customer shared the community met with management. Informed the customer of improvements the branch is making to better customer experience.

Customer: Woodbridge

Customer: Woodbridge: The customer made comments regarding closure being in line with the other branches that have been closed in the last several years. She said not many people in that area have cars, and it's a disadvantage. She advised she is moving to another bank, but I'm willing to wait to hear you out. I also hope to point out several opportunities for you to better serve this community, big houses, lakes, how far the other branch, Gentilly Woods, is and he began to mention how the weeds and trees are growing toward the end of last year. Advised that we would escalate her request to speak with the executive office. MD made contact with the customer and left voicemail to advise we looked into her concern/request. Advised the customer that the branch will not be moving. Advised the customer that the Iselin branch was closing in August. The customer shared the community met with management. Informed the customer of improvements the branch is making to better customer experience.

Customer: Westbury

Customer: Westbury: The customer shared the community met with management. Informed the customer of improvements the branch is making to better customer experience.

Customer: Yonkers

Customer: Yonkers: The customer was upset to learn that the Yonkers branch was closing in August. The customer shared the community met with management. Informed the customer of improvements the branch is making to better customer experience.

Customer: West Orange

Customer: West Orange: The customer made comments regarding closure being in line with the other branches that have been closed in the last several years. She said not many people in that area have cars, and it's a disadvantage. She advised she is moving to another bank, but I'm willing to wait to hear you out. I also hope to point out several opportunities for you to better serve this community, big houses, lakes, how far the other branch, Gentilly Woods, is and he began to mention how the weeds and trees are growing toward the end of last year. Advised that we would escalate her request to speak with the executive office. MD made contact with the customer and left voicemail to advise we looked into her concern/request. Advised the customer that the branch will not be moving. Advised the customer that the West Orange branch was closing in August. The customer shared the community met with management. Informed the customer of improvements the branch is making to better customer experience.

Customer: Glen Ridge

Customer: Glen Ridge: The customer was upset to learn that the Glen Ridge branch was closing in August. The customer shared the community met with management. Informed the customer of improvements the branch is making to better customer experience.

Customer: Glen Cove

Customer: Glen Cove: The customer asked the Chase representative for his service. The customer thanked each other and ended the call.
Customer is reaching out about the branch closing on 775 Columbus Ave, stating there is a signage that has gone up at the 775 Columbus and reading Road. Closing Branch has placed signs and passed out buck slips on 10/12/21 stating when the Branch is closing and the address to their nearest location. The branch is staged to close on 12/9. Thanked customer and wished them a nice day.

Customer is upset we are closing all the ATM and branch closure in the Central Business District (CBD) downtown Dallas. Chase has removed the closest 24 HR ATM is almost ¾ of mile in the CBD would not want to make that walk at sunset.

Customer feels the bank is unusable. Customer says that the bank doesn't value his business or else his needs would be accommodated. Customer said in the white neighborhood or white areas, the branches are open and all ATMs work unlike in his area. He said he will send a complaint about the branch closing on Garland Road in Texas now making it more difficult to make deposits.

Customer said in their branch is closing and there have been going there for 20 years. Customer said our website does not have an option for ATM or branch. I says the Branch is closing, with no date of closing indicated. Customer states when 775 Columbus branch closes his option and his neighbors will be walking 12 blocks to 109th ab Broadway or 8 blocks to 95th and Broadway. For older UWS'ers, the walk back from either of those branches takes a long time.

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Customer feels the bank is racist and says it phased out compatibility with older tech, systematically disadvantaging poor and minority communities by making it too expensive to use the online service.

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Customer feels the bank is racist and says it phased out compatibility with older tech, systematically disadvantaging poor and minority communities by making it too expensive to use the online service.
2021 TWITTER 1/12/2021 In scoring news, @chiase has created a new role in San Francisco designed to strengthen the bank's ties to local communities in the West — and named someone to head it. bizjournals.com/bi... San Francisco, San Mateo-Redwood City, CA-MD

2021 TWITTER 4/1/2021 CHASE & JPMorgan Chase, have gradually joined to leverage a $13 million investment from @morgang to provide rent relief & expand critical services that support housing stability for more than 7,300 households served by 19 affordable housing nonprofits. - bit.ly/VKJF_R

2021 TWITTER 4/22/2021 Happy to share $3M @JPMorgan @Chase investment with @SAHForg to strengthen housing stability targeting 7,500+ households served by 19

2021 INSTAGRAM 4/9/2021 From the FTE to the interior decor and of course those gorgeous custom built low edge coffee tables that Chris rocked this phase of the Russell Innovation Center for Entrepreneurs (RISE) commercial project has officially wrapped! We feel so privileged to have been invited to work with such an awesome group of amazing leaders on this collaboration between the ricela & @jpmorganchase. It was an absolute privilege to be asked to help bring this Chase Lounge space to life.❤️

2021 INSTAGRAM 4/9/2021 “We’re on a mission to help close the racial wealth gap. To support this goal, we partnered with The Russell Innovation Center for Entrepreneurs (RISE) to launch our first community Chase Lounge—a space designed to help level the economic playing field for the Black community in Atlanta, GA.” —JPMorgan Chase & Co.

2021 TWITTER 4/9/2021 @ServiceWarranty I'm now busily protecting our right to vote but we need you to shift to what the banks in GA are doing to small businesses. @Chase has frozen my account along with other small businesses in low income areas that desperately need the assistance!!

2021 INSTAGRAM 4/9/2021 This week we’re celebrating National Community Development Week! Community Development funding has helped us support and spearhead some fiscal projects through the COVID-19 pandemic. The such project was the San Diego Housing Commission’s purchase of an expanding 161-story high-rise hotel on Hotel Circle. The hotel was converted into 100 new, fully furnished, permanent affordable rental apartments with supportive services for individuals who experienced homelessness during the COVID-19 pandemic.

2021 TWITTER 4/16/2021 A lack of access to financial services is a familiar story for underserved communities across the U.S. Read about how @JPMorgan @Chase is helping.

2021 TWITTER 4/8/2021 Thank you to all of the #AHSMN2021 sponsors! We are proud to work with a wonderful group of businesses dedicated to helping make housing.

2021 TWITTER 4/5/2021 A lack of access to financial services is a familiar story for underserved communities across the U.S. Read about how @JPMorgan @Chase is helping.

2021 INSTAGRAM 4/2/2021 @AlmatGroup & @HabitatNYC  & Almat Group and the critical need for quality, affordable housing. At @Chase, we are committed to supporting projects like this that help local communities thrive.” Sharmi Sobhan

2021 TWITTER 5/13/2021 #RentRelief #EquitableRecovery #CapitalWithConscience

2021 TWITTER 7/3/2021 And yeah this is the spot in the movie Precious. This was a true Harlem gem.

2021 TWITTER 5/7/2021 New residents at this property were individuals served through Operation Shelter to Home. The Housing Commission provided 100 federal rental housing vouchers to help the new residents pay their rent for their permanent affordable rental housing at this property.

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2021 TWITTER 4/16/2021 A lack of access to financial services is a familiar story for underserved communities across the U.S. Read about how @JPMorgan @Chase is helping.
Huge congratulations to our 8th Graduating class of our CA Board of State & Community Corrections Youth Reinvestment Initiative. These 16 Success Stories completed 16 weeks of Life skills, Career Development, Leadership Development, Financial Literacy Workshops & Restorative Justice - Community Service Projects led by our tremendous Coach Adrianna she has educated, enlightened, & equipped her students w/ tools to develop a solid roadmap for success.

A Special thank you to Coach Jonathan aka Chase Bank Manager dedicating 2 hours of your Saturday these past 16 weeks. We are extremely grateful & our students are several steps ahead of their peers in the pursuit of financial freedom.

Thank you to our Community Partners San Bernardino City’s Community Prevention Program (Mr. David Miranda), BSCC, SB County Probation, & SB County Workforce Development Dept., Chase Bank Lead by our tremendous Coach Adrianna she has educated, enlightened, & equipped her students w/ tools to develop a solid roadmap for success.

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We're happy to announce that People Inc. has earned an award from the New York State Association for Affordable Housing (NYSAFAH) under the category of "Project of the Year in the Upstate Region." The recognition acknowledges our Jefferson Avenue Apartments, located in Buffalo's historic Jefferson corridor. It is a proud moment for everyone involved to receive this honor! The award was presented to Concetta Ferguson of People Inc. and Timothy Henry of Smith & Henry Advisory Group on Tuesday, November 9, in New York City, at the NYSAFAH Annual Awards for Excellence in Affordable Housing.

The People Inc. Jefferson Avenue Apartments project began construction in 2018 and celebrated the public opening in August 2021. In addition to People Inc. providing safe and affordable housing, a set of five murals adorn the apartment building, all designed by local artists and representing the history of the Jefferson Avenue community. We are so grateful for this award, and the partnership with so many who helped to make this project a reality, including our funders: NYS Homes and Community Renewal, NYS Housing Finance Agency, JP Morgan Chase Bank, Raymond James Tax Credit Funds, City of Buffalo HOME Program, NYS Empire State Development, NYS Energy Research and Development Authority and NYS Office for People With Developmental Disabilities.

Yo! All the ATMs near me are down and I need to deposit cash! The next closest branch is the next town up! I'm glad I'm leaving Chase soon. They closed ALL the branches in the low income areas and it says a lot about them as a whole.

It was great to witness the ribbon-cutting of Chase Bank’s new Community-Inspired Branch in downtown Oakland where they will offer free financial health resources like skills training, local pop-up shops and innovative technology & services for local residents and small businesses including:

- Growth support for local entrepreneurs starting or expanding their small business
- Mentoring for entrepreneurs and access to a pop-up space
- New community "living room" area to host events, community groups and local non-profits
- Workshops to build financial health - including sessions on saving, budgeting and building credit
- Free use of the tech bar space and Wi-Fi for community groups and residents
- Traditional banking services and information that can help the underserved community affordably manage their finances
- Art created by local artists is also integrated into the branch design


@Chase you closed the drive up bank in Danville, KY. You only have one ATM in a town of over 17,000. What sense does that make? @ChaseSupport y'all can't afford to install more ATMs?
Customer Comments

Customer Comments

Early January 2022 my JPM Chase banker informed me of a grant program offered by Chase when I shared our grassroots events, projects and programs. He soon introduced me to [REDACTED CONTENT] at the Chase branch, 5207 Airline Drive, Houston, TX 77022. I met her via phone and I soon delivered documents on our non-profit and summary of our projects, programs, etc. January 27, 2022. However, on January 31 [REDACTED CONTENT] emailed that Chase would not be able to sponsor at this time as the projects do not meet four pillars criteria. I asked why she had not provided in advance the pillars, and requested she provide them to me. Feb. 1 I responded that we are eligible for all the pillars after having reviewed them; and affordable housing surely one of our priorities. Feb. 7 she responded she would make some connections to support our affordable housing. No response after we provided the information to [REDACTED CONTENT] so I emailed her March 9, 2022 asking how much longer before hearing from her on our proposed projects for funding by Chase. No word from [REDACTED CONTENT] so another request for an update was emailed her March 23. Still no response so April 5 we received response to our concerned letter to Chase about [REDACTED CONTENT]. [REDACTED CONTENT] in central giving for Chase is who I spoke to and forwarded copies of our emails to [REDACTED CONTENT]. No response from [REDACTED CONTENT] (4/27/2022) despite email to her today. Chase customer care took our concern but admitted nothing they could do. Corporate Chase did nothing. Federal Reserve contacted and instructed I contact CFPB and file this complaint. Chase ads seen in various newspapers in Houston, Texas about millions it has to give to disadvantaged neighborhoods, small businesses, etc., yet, we are met with only blockades to receive funding.

*Note: Comments are verbatim from the submission to the online regulatory form; personal or sensitive information has been redacted.
June 2, 2022

[REDACTED CONTENT]
Houston, TX 77019

We confirmed your point of contact for this matter

Dear [REDACTED CONTENT]:

We are responding to your complaint about funding for your project in Freedman’s Town and your service experience. Thank you for sharing your concerns.

We appreciate you taking the time to tell us about our service. Your feedback is important to us. We aim to give exceptional service and are sorry if we did not meet this goal when you did not receive a response to the emails you sent.

We escalated your concerns and understand Program Director [REDACTED CONTENT] has contacted you about this matter. He will be your point of contact going forward. You may call [REDACTED CONTENT] directly at [REDACTED CONTENT].

If you have questions, please call us at 1-877-805-8049 and reference case number [REDACTED CONTENT]. We accept operator relay calls. We are here Monday through Friday from 7 a.m. to 8 p.m. and Saturday from 8 a.m. to 5 p.m. Central Time.

Sincerely,

Executive Office
1-877-805-8049
1-866-535-3403 Fax; it’s free from any Chase branch
chase.com
Customer Comments Received via Regulatory Agency Website*

Comment: Houston, TX Written Comments
Date Submitted: 7/15/22
Submitted Via: CFPB Online Customer Complaint Form

Customer Comments

Today, July 15, 2022. Had not heard from Chase's [REDACTED CONTENT] over the Community Impact Team that oversees the alleged $30 billion Chase purported publicly to give to disadvantaged communities since CFPB had him phone me May 31, 2022. Received his voice mail on July 7 and 15. As I was preparing to amend my prior complaint to CFPB on this Chase matter, [REDACTED CONTENT] returned my call. Apologized for having had not gotten back to me in nearly two months. He basically said they (he and his team) were unfamiliar on how to disburse the said funding despite 1.5 yeas into the 5 year funding period; said that a few cities had received funding and I asked names. Reluctantly he said Chicago and Houston. [REDACTED CONTENT] said a large affordable housing project had received funding in Houston but he hinted I would have to file FOIA to obtain from city of Houston. I reminded him of our disadvantaged community of Freedman's Town need for affordable housing, small business development, youth center construction and historic preservation, and that during our May 31, 2022 conversation he had assured me we would receive funding from Chase. Now he's clueless but managed to fund entities in Houston that really do not serve the disadvantaged but focuses on homeownership. In addition, [REDACTED CONTENT] said Chase's products must be made to accommodate the disadvantaged and that he could not give me any timetable on when we would receive funding. Chase's priority is homeownership rather than affordable rental housing he said, [REDACTED CONTENT] rhetoric was the standard we receive when an entity is lying about helping us. They tell CFPB what it wants to hear but does nothing to honor its stated commitment to help us. [REDACTED CONTENT] only clarified his position when I had asked to speak to the head person in Chase’s executive office. He merely said they would send me back to him. I thanked him and closed our talk. I then contacted Chase's executive office and the intake person [REDACTED CONTENT] was clueless. All she offered was directing me to the Inspector General. Please add my previous complaint on this matter also. Thank you.

*Note: Comments are verbatim from the submission to the online regulatory form; personal or sensitive information has been redacted.
July 26, 2022

[REDACTED CONTENT]
Houston, TX 77093

Dear [REDACTED CONTENT]:

We are responding to your complaint about funding for your project in [REDACTED CONTENT]. Thank you for sharing your concerns.

We appreciate your feedback about affordable housing and your project in [REDACTED CONTENT]. Program Director, [REDACTED CONTENT], is your point of contact for this matter. We understand he has recently contacted you about your request and advised that he will continue to give you additional information as it becomes available. You will need to work with [REDACTED CONTENT] for your requests or questions about this matter.

If you have questions, please call us at 1-877-805-8049 and reference case number [REDACTED CONTENT]. We accept operator relay calls. We are here Monday through Friday from 8 a.m. to 9 p.m. and Saturday from 9 a.m. to 6 p.m. Eastern Time.

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chase.com
Customer Comments Received via Regulatory Agency Website*

Comment: Houston, TX Written Comments
Date Submitted: 9/9/22
Submitted Via: OCC Online Customer Complaint Form

Customer Comments

Bank of America, Chase and Wells Fargo have all been contacted and could care less about complying to the CRA. You see their ads boasting millions, billions of dollars to invest in disadvantaged communities, small businesses, etc. but I have approached them all about investing in our youth center and small business and get no where. I also complained to the CFPB on Chase because of blatant discriminatory practices and policies of it investing in Houston while overlooking our community. We have been merely lied to and Chase merely threw us back to its same rude CRA Team and now months have passed and not one word from Chase or the other two banks. What is the purpose of the CRA and regulators such as the OCC when no tangible, progressive results?

*Note: Comments are verbatim from the submission to the online regulatory form; personal or sensitive information has been redacted.
Thank you for your feedback

Dear [REDACTED CONTENT]:

We are responding to your complaint about a lack of financing for affordable single-family and duplex construction projects, and funding for a youth center in Freedman Town, Houston Texas. Thank you for sharing your concerns.

We understand that [REDACTED CONTENT]; Managing Director, called you and advised that we do not provide financing for single-family and duplex construction projects. We do however provide grants to Community Development Financial Institutions (CDFI). [REDACTED CONTENT] will contact you shortly with the contact information for the CDFIs whom we work with.

We take complaints that claim discrimination seriously. We do not tolerate any form of discrimination as it is strictly against our policy and contrary to our corporate culture.

If you have questions, please call us at 1-877-805-8049 and reference case number [REDACTED CONTENT]. We accept operator relay calls. We are here Monday through Friday from 8 a.m. to 9 p.m. and Saturday from 9 a.m. to 6 p.m. Eastern Time.

Sincerely,

Executive Office
1-877-805-8049
1-866-535-3403 Fax; it’s free from any Chase branch
chase.com
November 14, 2022

Customer Assistant Group
Office of the Comptroller of the Currency
P.O. Box 53570
Houston, Texas 77052

RE: JP Morgan Chase Bank, National Association

Customer Assistant Group.

Received your letter dated November 8, 2022, on November 12, 2022.

I am presenting my appeal because JP Morgan Chase Bank only contacted me saying the same inappropriate lie: that its Team would contact me but unknown when. I have been told so many different positions by Chase that my questions to them catch them off guard and I hear silence. Next, I am always told someone would contact me immediately, but that does not happen.

The OCC must ensure that a specific timetable is achieved, and the goal of that timetable met by Chase. Otherwise, Chase's discriminatory practices and policies will continue against heritage [REDACTED CONTENT] and additional Moorish Americans.

My contact phone cell: [REDACTED CONTENT]. That way I may intercept your phone calls.

Seriously yours,

[REDACTED CONTENT]
Good Morning:

This is a complaint against J.P. Morgan Chase Bank.

My Trotwood Bank at 5511 Salem Ave., Dayton, Ohio 45426 is closing and have requested that I remove contents of my Safety Deposit Box by September 8, 2022. I have been a long-time customer of the bank with a checking, saving and investment account, dating back to its predecessor banks, Winters Bank and Bank One.

I called the Chase Bank 1-800-935-9935 on 8/10/22 for assistance with locations to apply for a Safety Deposit Box to remove my contents to by the deadline. The Bank representative said she “was so sorry But Chase was no longer issuing any more Safety Deposit Boxes.” I asked if any exception could be made because my Bank was discontinuing operation but told none could be made.

My concern is this: When you live in non-opportunity communities (African American) you tolerate Banks, like Chase, which provide less services and stated it “was not a community Bank.” to me in the past at my closing location. The Trotwood Branch had no notary republic vs the Branch in Englewood which had three notary republics. And I travelled to the Englewood Band for that service and to the downtown locations for other services not available at Trotwood before the Kettering Tower Location closed. Now, I have to go outside my community for Banking Services with them which I am willing to do but be denied a service of a Safety Box I value and need and have had with them over thirty years.

Sincerely,

[REDACTED CONTENT]
Thank you for sharing your concerns with us

Dear [REDACTED CONTENT]:

We are responding to your complaint about the closing of your Safe Deposit Box and your service experience. Thank you for sharing your concerns.

We’re sorry for the inconvenience caused by the closure of our Salem Trotwood branch. We no longer offer Safe Deposit Boxes at any of our branch locations. When we spoke with you over the phone, you confirmed that you were able to close your Safe Deposit Box and retrieve the contents on August 26, 2022.

We appreciate you taking the time to tell us about your concerns. Your feedback helps us serve you better. We take complaints that claim discrimination seriously. We do not tolerate any form of discrimination as it is strictly against our policy and contrary to our corporate culture.

Thank you for banking with us. If you have questions, please call us at 1-877-805-8049 and reference case number [REDACTED CONTENT]. We accept operator relay calls. We’re here Monday through Friday from 8 a.m. to 9 p.m. and Saturday from 9 a.m. to 6 p.m. Eastern Time.

Sincerely,

Executive Office
1-877-805-8049
1-866-535-3403 Fax; it’s free from any Chase branch
executive.office@chase.com
chase.com
November 30, 2022

Mr. Jamie Dimon  
JPMorgan Chase & Co  
1111 Polaris Parkway  
Columbus, OH 43240

Dear Mr. Dimon,

The Nebraska Lawyers Trust Account Foundation (NL TAF) would like to present you with a Public Service Statement for your CRA file. The participation of JPMorgan Chase & Co in the Interest on Lawyers Trust Account (IOLTA) Program is sincerely appreciated. IOLTA is an indirect "community service" that provides legal assistance to indigent people. One sixth of Nebraska's population meets the federal poverty guidelines and thus are eligible for these services. Your partnership helps meet this growing need for accessible legal services for Nebraska's vulnerable population.

JPMorgan Chase & Co community service exemplifies your commitment to the public. Again, thank you for your participation in this worthwhile program that helps our fellow Nebraskans. You may wish to visit the NL TAF website www.nltaf.org for additional information about the IOLTA program.

Cordially,

[REDACTED CONTENT]
JPMorgan Chase & Co participates in the Interest on Lawyers Trust Account (IOLTA) Program. Established in 1984 by the Nebraska Supreme Court, the IOLTA Program is administered by the Nebraska Lawyers Trust Account Foundation. The purpose of the Program is to provide funding for legal services to Nebraska’s low-income citizens.

The attorney trust accounts are interest-bearing, and the interest generated is paid to the Foundation. This financially assists in providing the necessary legal services to the poor and vulnerable.

Semi-annual disbursements from the IOLTA fund are awarded to Legal Aid of Nebraska. The disbursements given since 1984 total $6,426,500. Through this added financial support, Legal Aid has been able to assist, advise, and represent a vast number of indigent Nebraskans statewide on a variety of issues. There are almost 200,000 low-income people in Nebraska who are eligible to receive free legal services.

The availability of these free legal services to low-income people is often directly related to their ability to obtain credit and/or maintain housing. In addition, the funds are used for unemployment matters, wills, landlord/tenant relations, elder law, consumer issues, education issues, as well as family and juvenile law.

The benefits generated by the IOLTA Program are the results of the combined effort of the legal profession and the banking industry working together to help Nebraska’s poor. JPMorgan Chase & Co’s commitment to this program is to be commended. Thank you for your participation in this valuable Program!

Respectfully,

[REDACTED CONTENT]
President November
2022
I am a very long-time chase customer. my local chase branch closed a few weeks ago and told me i had to move my safe-deposit box contents.

A representative called in stating that the customer is calling in representation of retirement community and want to protest that the branch is closing.

Chase bank has removed support from our neighborhoods by closing a branch located on Atlantic avenue between 102h st and 104 street. Thank you for your attention to this matter.

I would like to open a checking account with Bank of America for the purpose of making cash deposits, and then use Zelle to transfer money from B of A to my new bank account.

Hello [redacted], Thank you for contacting us. We understand the importance of your inquiry.  As the branch is temporarily closed at

Hello [redacted], Thank you for contacting us. We understand the importance of your inquiry.  As the branch is temporarily closed at

I am a very long-time chase customer. my local chase branch closed a few weeks ago and told me i had to move my safe-deposit box contents.

The branch manager “[redacted]” at Forest Parkway branch is very accommodating to use it but when I went in the machine display boldly stated it could not accept cash deposits,give cash,or transfer funds to another account. I guess it could give me balances on my accounts!

Forest parkway is overburdened and too small to accommodate the large populations of our neighborhoods. There was a satellite branch that the local branch by transferring if i was willing to wait, but then every time it rings for a while and then a recording says they're full and I must try again.

I wish Chase bank had an easy solution to the branch problems. I would be willing to drive to the branch if I had a car.  I would be willing to wait in line if it's not too long. I understand that Chase bank wants to save money, and I hope they can find a solution that works for both them and their customers.

Chase was built on the backs of the Black community. Chase will continue to build on the backs of the Black community. Chase is not building on the backs of the Brown community.

I think it would be great if Chase had a branch on every corner. Chase should be more accessible to the Black community. Chase should be more accessible to the Brown community. Chase should be more accessible to all communities.

Hello [redacted], Thank you for contacting us. We understand the importance of your inquiry.  As the branch is temporarily closed at

2022-07-14, JPMC representative contacted customer to discuss his concerns and provide additional information regarding how to access the contents of his safety deposit box.

JPMC representative contacted customer and apologized for any inconvenience. Let customer know that issue was escalated to

If I had my way, I would get rid of this kiosk and put a different one in a much better location in west Olympia. Access to this kiosk has always been difficult because of its location. To reach it, drivers have to make twists and turns in a poorly designed parking lot on a slope. When the slope is steep, it's difficult for people with disabilities to get there. It's a steep hill, and there is no protection from the rain coming into their vehicle. It rains 52.7 inches annually in Olympia, WA compared to 38.1" national average.

There is no Chase Bank in west Olympia where I live. I work full-time at home so I don't like losing time and gas money traveling 4 miles round trip down a steep hillside to the nearest Chase Bank and nearest kiosk at 825 Capitol Way S, Olympia, (360) 754-4280.

There is no Chase Bank in west Olympia where I live. I work full-time at home so I don't like losing time and gas money traveling 4 miles round trip down a steep hillside to the nearest Chase Bank and nearest kiosk at 825 Capitol Way S, Olympia, (360) 754-4280.

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**Customer email sent to Jaime Dimon:**

**10/25/2022**

I am a very worried customer. Gratefully, [redacted]

**10/13/2022**

We are responding to your complaint about the closing of your safe deposit box. Thank you for sharing your concerns. We appreciate you taking the time to make us aware of your concerns, and we are looking into your concerns and will respond to you shortly.

**10/11/2022**

I am a very worried customer. Gratefully, [redacted]

**10/4/2022**

We are responding to your complaint about the closing of your safe deposit box. Thank you for sharing your concerns. We appreciate you taking the time to make us aware of your concerns, and we are looking into your concerns and will respond to you shortly.

**9/7/2022**

We are responding to your complaint about the closing of your safe deposit box. Thank you for sharing your concerns. We appreciate you taking the time to make us aware of your concerns, and we are looking into your concerns and will respond to you shortly.

**10/3/2022**

We are responding to your complaint about the closing of your safe deposit box. Thank you for sharing your concerns. We appreciate you taking the time to make us aware of your concerns, and we are looking into your concerns and will respond to you shortly.

**8/24/2022**

We are responding to your complaint about the closing of your safe deposit box. Thank you for sharing your concerns. We appreciate you taking the time to make us aware of your concerns, and we are looking into your concerns and will respond to you shortly.
**Additional Social Media message from customer:** Lies lies

**New York State Senate & Assembly Letter to Jaime Dimon:**

Customer email sent to Jaime Dimon:

经济机会。

The 19th Ward is a historically African-American community, but today represents one of Rochester's largest and most diverse remaining banking available is inside of a grocery store and does not offer 24-hour access to an ATM. There is an opportunity for Chase to help one that is safe, well-lit, covered and WORKING. I would like to have a full-service branch on the Northside of Youngstown. I would like Youngstown was closed or downsized significantly. As a corporate giant, Chase ought to be embarrassed that they continue to perpetuate this ATM on this side of town from the only other full-service branch was head-scratching. 4. Chase seems to be engaging in the time honored do my banking. Yes, the city (Girard) is only 6-10 miles from my house but I do not like the fact that I cannot bank in the City of Youngstown. Happy holidays sir, again thank you [redacted] has all of my correct contact information as banker [redacted] did. She was outstanding.

Clearly someone at Chase doesn't get it.

JPMC representative contacted the legislator that sent the letter and advised that Government Affairs employee, [redacted], will discuss opportunities, recommendations and potential new builds. At this time the closest branches to your are the Crystal Cove Laguna Beach which is about 10 miles away and the Sanibel Island branch which is about 5 miles away. We encourage any inconvenience this occurred is not your fault but to your bank about your branch network.

**JPMC representative contacted the customer via letter.**

**JPMC representative contacted the customer and stated that he has considered his current correspondence around the information in the letter I thank you for your feedback about our branch network.

**JPMC representative contacted the customer and asked if she would like to have a branch in the area.**

JPMC representative called customer and apologized to the customer for the poor service experience and thanked the customer for giving the feedback.

**JPMC representative contacted the customer and asked if she would like to have a branch in the area.**

JPMC representative contacted the customer and expressed concern about the evacuation of two branches due to the branch closing. At this time the closest branches to your are the Crystal Cove Laguna Beach which is about 10 miles away and the Sanibel Island branch which is about 5 miles away. We encourage any inconvenience this occurred is not your fault but to your bank about your branch network.

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<td>2022</td>
<td>TWITTER</td>
<td>2/12/2022</td>
<td>@Chase ATM but only two consistently work in a busy underserved community. Do better ASAP. This is Bureaucracy in the boxers and you do your Customer Service like this?</td>
<td>New York-Newark, NY-NJ-CT-PA</td>
<td>CA</td>
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<td>2022</td>
<td>TWITTER</td>
<td>2/16/2022</td>
<td>Yes Bureaucracy @Chase @Chase What if with Chase closing so many branches over the last several months? I have closed near me.</td>
<td>Tulsa, OK MSA</td>
<td>CA</td>
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<tr>
<td>2022</td>
<td>TWITTER</td>
<td>2/2/2022</td>
<td>Does anyone know why @Chase keeps removing and not replacing public ATMs in Tulsa? I'm at the 2nd branch that has removed ATM recently, plus the other branch closing, are they pulling out of Tulsa?</td>
<td>Tulsa, OK MSA</td>
<td>CA</td>
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<td>TWITTER</td>
<td>2/16/2022</td>
<td>Yesterday we celebrated the grand breaking of Alera, 100 affordable housing apartments in San Marcos! Thank you to all involved! @chasscExecutive @SanDiegoGroup @BWNC_Inc @Chase @emerson @CalifGroup @BDvllers @BDCountyHSA pic.twitter.com/FRWNo2WYo</td>
<td>Santa Rosa-Petaluma, CA MSA</td>
<td>CA</td>
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<td>2022</td>
<td>LINKEDIN</td>
<td>3/1/2022</td>
<td>Atlanta is doing amazing things! Tuesday I was able to attend a conversation with our CEO Jamie Dimon and Atlanta Mayor Andre Dickens about the @Chase and Co. investing $24 million into five organizations working to improve housing affordability in the Black, Hispanic and Latino communities.</td>
<td>Atlanta-Sandy Springs-Alpharetta, CA MSA</td>
<td>CA</td>
</tr>
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<td>2022</td>
<td>TWITTER</td>
<td>2/6/2022</td>
<td>What a great start to the week! Got to meet the @Chase and Co. team and learn about their work to support Black and Latinx women developers investing in communities in West Baltimore! #Q3Growth</td>
<td>Baltimore-Columbia-Towson, MD MSA</td>
<td>CA</td>
</tr>
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<td>2022</td>
<td>LINKEDIN</td>
<td>3/16/2022</td>
<td>Today was Vision Day for our Flagship Meeting St branch in downtown Charleston! I'm so proud of all they have accomplished and their doors aren't even open yet! I'm so excited to see the vision light up our downtown market and to finally serve the downtown Charleston community! Congratulations Melissa Matthews, MBA and Allison Hernandez on this historic event for Chase!</td>
<td>Charleston-North Charleston, SC MSA</td>
<td>CA</td>
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<td>@Chase Why is that I have NO access to 24 hour banking in East Harlem but the rich folk on 86th street do? Sounds like discrimination to me!!! I want my 24 hour banking access back!!!</td>
<td>New York-City White Plains, NY-NJ-NB</td>
<td>CA</td>
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<tr>
<td>2022</td>
<td>TWITTER</td>
<td>2/12/2022</td>
<td>@Chase ATM but only two consistently work in a busy underserved community. Do better ASAP. This is Bureaucracy in the boxers and you do your Customer Service like this?</td>
<td>New York-Newark, NY-NJ-CT-PA</td>
<td>CA</td>
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<tr>
<td>2022</td>
<td>TWITTER</td>
<td>2/16/2022</td>
<td>Yes Bureaucracy @Chase @Chase What if with Chase closing so many branches over the last several months? I have closed near me.</td>
<td>Tulsa, OK MSA</td>
<td>CA</td>
</tr>
<tr>
<td>2022</td>
<td>TWITTER</td>
<td>2/2/2022</td>
<td>Does anyone know why @Chase keeps removing and not replacing public ATMs in Tulsa? I'm at the 2nd branch that has removed ATM recently, plus the other branch closing, are they pulling out of Tulsa?</td>
<td>Tulsa, OK MSA</td>
<td>CA</td>
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<tr>
<td>2022</td>
<td>TWITTER</td>
<td>2/16/2022</td>
<td>Yesterday we celebrated the grand breaking of Alera, 100 affordable housing apartments in San Marcos! Thank you to all involved! @chasscExecutive @SanDiegoGroup @BWNC_Inc @Chase @emerson @CalifGroup @BDvllers @BDCountyHSA pic.twitter.com/FRWNo2WYo</td>
<td>Santa Rosa-Petaluma, CA MSA</td>
<td>CA</td>
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<td>2022</td>
<td>LINKEDIN</td>
<td>3/1/2022</td>
<td>Atlanta is doing amazing things! Tuesday I was able to attend a conversation with our CEO Jamie Dimon and Atlanta Mayor Andre Dickens about the @Chase and Co. investing $24 million into five organizations working to improve housing affordability in the Black, Hispanic and Latino communities.</td>
<td>Atlanta-Sandy Springs-Alpharetta, CA MSA</td>
<td>CA</td>
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<td>2022</td>
<td>TWITTER</td>
<td>2/6/2022</td>
<td>What a great start to the week! Got to meet the @Chase and Co. team and learn about their work to support Black and Latinx women developers investing in communities in West Baltimore! #Q3Growth</td>
<td>Baltimore-Columbia-Towson, MD MSA</td>
<td>CA</td>
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<tr>
<td>2022</td>
<td>LINKEDIN</td>
<td>3/16/2022</td>
<td>Today was Vision Day for our Flagship Meeting St branch in downtown Charleston! I'm so proud of all they have accomplished and their doors aren't even open yet! I'm so excited to see the vision light up our downtown market and to finally serve the downtown Charleston community! Congratulations Melissa Matthews, MBA and Allison Hernandez on this historic event for Chase!</td>
<td>Charleston-North Charleston, SC MSA</td>
<td>CA</td>
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<td>2022</td>
<td>TWITTER</td>
<td>3/17/2022</td>
<td>@Chase Why is that I have NO access to 24 hour banking in East Harlem but the rich folk on 86th street do? Sounds like discrimination to me!!! I want my 24 hour banking access back!!!</td>
<td>New York-City White Plains, NY-NJ-NB</td>
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PARTNERSHIP: Willowglen Apartments, Burbank Housing’s newest affordablehousing community in Rohnert Park had its ribbon-cutting celebration yesterday! Leadership and Board members from Burbank Housing were joined by officials from the City of Rohnert Park and residents of the new apartments to celebrate this welcome addition to community.

The Chase for Business Luminary Fellowship Program
JPMorgan Chase firmly believes that individuals have the ability to be resilient. As a community, there is power to come back stronger together. The Chase for Business Luminary Fellowship Program is supporting businesses owned or founded by women, awarding a total of 150 fellowships, with at least 50% awarded to women of color.

This program gives fellow access to Luminaries’ extensive global community, introductions, workshops, coaching, mentoring and The Luminary Collective, a business marketplace. Fellows will also receive real-world experience, leadership opportunities and insights from our partner Chase for Business.

JPMorgan Chase & Co. Luminaries Collective RohnertParkWomen

Great time and important takeaways at the NEON Community Conversation. Warren McLean hosted the event, Harry Colbert Jr. moderated an All Star panel with Darnell Johnson, Chief Justice Sutherland, and Anna Keyes, MA, JPT, LICSW, RYT.

Thank you Northside Economic Opportunity Network (NEON) for hosting the event and demonstrating the impact your organization has in the community.

And thank you JPMorgan Chase & Co. for the opportunity to come together and help make a difference in the communities we serve.

Dean Buntermann / Jacq Derritt / Tessy Edali / Dani L. Hennen / Michael Henson / Phyllis Messi / Phil MacDonald / Oppenlander / David Rudolph / Patricia Shulak / Joanne Trotter

We are already working with Kenneth Verbeck, Sean Worl, Mike Tharp, Mike Holzgang at Colliers on our second project site!

Huge shoutout to our team Darryl Briley, Milo Terzich, Sean Reynolds, Jori Henry and Darren Bobrowsky and development partners at MWA Architects, Inc. and Walsh Construction Co. for bringing this deal home.

Rural Communities Housing Development Corporation is tackling the affordable housing gap with a new development that will help change the lives of local low-income homeless, special needs and at-risk households in Siskiyou County who will live there,” said James Vossoughi, Executive Director, Rural Communities Housing Development Corporation, a business marketplace. Fellows will also receive best-in-class thought leadership, opportunities and insights from our partner Chase for Business.

This program gives fellows access to Luminary’s extensive global community, introductions, workshops, coaching, mentoring and The Luminary Collective, a business marketplace. Fellows will also receive real-world experience, leadership opportunities and insights from our partner Chase for Business.

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JPMorgan Chase & Co. Luminaries Collective RohnertParkWomen

WOMEN: Registration for the 2022 National SBDC/businesses Virtual Summit is now open! The summit, co-sponsored by SCORE Mentors, will take place May 2-5 and feature federal resources, educational workshops, networking, and more.

Register here: https://kaa.gochow

We are sincerely grateful to our generous partners — who share our vision for a vibrant, prosperous, and connected Black and African American small business community throughout California! America’s SBDC Northern California SBDC NorCal SBDC Finance Center Oakland African American Chamber of Commerce Blue Water Credit ReoMark Community Credit Union Chase for Business

San Jose-San Francisco-Oakland, CA CSA

Portland-Vancouver-Salem, OR- WA CSA

San Jose-San Francisco-Oakland, CA CSA

Rohnert Park

San Jose-San Francisco-Oakland, CA CSA

Rohnert Park

https://kaa.gochow

The road was long to get to this point, but the partnership and determination by city officials, Penn Grove Mountain LLC, and Burbank Housing to make this a reality was solid. With a combination of financing from Chase Bank and tax credits administered by the California Tax Credit Allocation Committee (CTCAC), and purchased by RBC as the project’s equity investor, the 36 units of Willowglen Apartments took shape and now can be called home to over 60 people in southwest Rohnert Park.

A huge thank you to City of Rohnert Park Mayor Jackie Ewar, Council Members Gerard Giusti, Pam Stafford, and Willy Luraschi for joining us and speaking at this milestone. Thank you to Burbank Housing Board Chair Sharon Wright for her words of gratitude and hope for more ribbon-cuttings on affordable housing in Rohnert Park in the coming years, and to Amber Florence, Willowglen resident, for her powerful testimony on the impact affordable housing has had on creating opportunity and space for her family to pursue lives that are full.

Special recognition to Katetina Giusti, Field Representative for Congressman Mike Thompson, who joined for the celebration and presented a proclamation of recognition to Burbank Housing for adding these 36 homes to Rohnert Park, and the opportunities they provide to families. It was both an honor and a special surprise to us. We are grateful.

Thank you to Sally Tomatoes, Elene Zelman-Rai at Clone Print, The Rental Place LLC, and LAT Events Inc. for their support in making this all come together. It certainly takes a village! Forward to the next!
2022 
Twitter 
6/22/2022 
We welcomed @NYCHousing staff for a tour of our recently completed Sunset Park Library Project! 
New York, New York, NY-CT-PA-CIA 

2022 
Twitter 
6/24/2022 
@Chase is common practice for businesses to make night drops of cash and checks. Why @Chase discriminating against business owners by keeping atms closed in the upper west side? 

2022 
Twitter 
6/24/2022 
@Chase if you close atms in any neighborhood no matter race or gender you are practicing discrimination by only allowing a certain customer access their funds according to where they reside. 

2022 
Twitter 
6/24/2022 
Thank you @Chase for sharing this paper in @Chase’s Community Development Innovation Review. “Addressing the Capitalization and 
Financial constraints of MEC1 Microenterpreneurs,” and helping to highlight the promise of CDFI Fund, WBAFund appearinvest.org/publications/... (Lapham, B0) 

2022 
LinkedIn 
6/29/2022 
The CBI team recently traveled to Chicago to meet CDFIs in our membership and visit their borrowers. A few of our partners also joined us and had the opportunity to witness how their investments in CDFIs generate economic opportunity for people and places that mainstream finance doesn’t traditionally reach. Read more: https://t.co/vyPb56Q 
Chicago-Naperville-Elgin, IL-IN-WI 

2022 
LinkedIn 
6/30/2022 
What a day! It was so exciting to host the Central Valley Community Foundation Council of Business Sponsors back in person after two years to discuss all things housing. Thank you, Jennifer Lias, Mayor Jerry Dyer, Deputy Mayor Matthew Grundy & Urban Planner Dan Zuck, AICP, CNU-A for joining us for a fantastic overview of housing priorities & strategies on a local, regional, and statewide level. Through these public and private partnerships, we garner the leadership needed to overcoming barriers to equitable, affordable housing creating a thriving, healthy and vibrant community for all residents.

Our CBI Members also heard from CA FWD CEO Micah Weinberger about the ongoing CDFI process and upcoming California Economic Summit heading to Bakersfield this fall. Our CEO Ashley Swearingen is the Co-Chair of CA FWD and excited to see the summit come back to the Central Valley.

Thank you to our Council of Business Sponsor members who generously donate their time and funding to the impactful work here at the Central Valley Community Foundation: The Wonderful Company, Wells Fargo, JPMorgan Chase & Co., Bank of America, Chevron, EECU Credit Union & Valley Children’s Healthcare. 
Central Valley Community Foundation 

2022 
LinkedIn 
7/2/2022 
Last Thursday Chase for Business and @Chase for Business invited me to participate in a forum to share information about the business service program available at the New York State Department of Labor. Other knowledgeable panelists were able to present about cyber security & protection for small business, access to financial services, marketing among other interesting topics.

The presentations were made in Spanish. We were thrilled to learn from the attendees the importance of hosting more events like this one as many people are not familiar with our no-cost services: 
- Tax Credits
- Human Resources Assistance
- NY Talent & SMART tools
- Job postings
- Apprenticeship Training
- Shared Work programs
- Labor Market Information and many more.

I am glad that some time led to added financial assistance! 

2022 
Twitter 
7/5/2022 
@Chase Arverne needs way more service than ONE atm machine! What’s your plans to service the community? Cc @JSLandersNYC New York, New York, NY-CT-PA-CIA

Exreme By The Sea

2022 
Twitter 
8/5/2022 
Awesome to see @JPMorgan @Chase on this affordable housing project. Literally about 100 yards from their commercial banking office and the state capital in Sacramento California.

#ArverneByTheSea 

2022 
Facebook 
8/5/2022 
Direct deposited my veterans compensation disability check into my brothers account - since our names did not match chase closed the account and held my money without sending back the check to the Va. This issue has put me into a financial hardship, mental stress affecting my service connected PTSD - no one has wanted to help me. I have had to receive multiple military grants to make up for this money that chase holds of mine.

I am still behind 2 months on my auto payment considering this money was a whole months salary and my only source of income. I am receiving under 1200 0.00 a month and I am considered low income. I don’t know what I have to do for the bank to return the check to the Va but I’m tired of waiting around for nothing to happen and the bank thinking that they can just take what the want from who no matter what could go on being with the customer. I need answer about my money.

2022 
Twitter 
8/19/2022 
Yesterday, we kicked off our inaugural Financial Literacy Class in partnership with @chase! Keep an eye on our weekly calendar to save the date for the next one!

#FinancialLiteracy #GenSpace #HealthyAging #Aging #AgingWell #Longevity #Community

2022 
Facebook 
9/1/2022 
Very frustrated with Chase bank we had same ATMs at our bank and one was taken out nad now the remaining one isn’t working properly. The reason I switched to Chase was PNC made it harder to bank doing branches taking out ATMs and here I am again having a hard time banking...

2022 
Twitter 
9/1/2022 
To frustrate with my banking relationship with Chase. After making an electronic deposit from my phone on Friday, and having it accepted, at 9:00 am, it was hit with a $12 fee for the “account was closed” for the check I was depositing. After visiting my “local” branch (one of 2 nearest branches closed recently as did the 2 nearest ATMs), it appears that there was an issue with the image of the check that was rejected and 2 digits are missing. Those digits were there when I took the image and were there during the manual verification process. The chase branch said they haven’t seen this happen before. They accepted the physical check for deposit but were unable to remove the $12 fee. They advised me to explain it to customer service who should remove the fee since it was not something I nor the person writing the check could control. It seems like a system issue. I called customer service who said their “system automatically denied my request for a refund.” I deposit checks thru chase weekly. Usually on my phone given that so many chase services have closed. I can’t afford a $12 fee every time I deposit a check if there is an issue with the data. Is there anything you can do? I am a good banking customer...I don’t have overdrafts. I’m getting ready to purchase a house and I was considering chase as a mortgage lender...but this situation has me concerned now about additional fees or customer service.

2022 
Twitter 
9/1/2022 
Good evening secure messaging is not working for me to reply about my bill pay. I keep receiving an automated message concerning my bill pay, however, the monthly direct deposit will not hit my account until the scheduled day of this month. I have explained on two occasions that any bill payments need to come out of my account when the designated monthly monies are presented to the account. I am not the one controlling when the deposit is presented or when Chase will decide to release the funds to my account. Chase knows that many of its customers such as I unfortunately due to circumstances live to check, so trying to chastise and humiliate me about my financial situation can be construed as discrimination against low-income customers including causing low-income customers (who are the majority impacted by the amoral practice) to pay extra overdrafts by maneuvering transactions so the highest amount of overdrafts can be garnered (although legal).
Today, we kick off Hispanic Heritage month. Celebrating and recognizing the contributions and influence of Hispanic Americans to the history, culture, and achievements in the United States. This past Monday, the San Fernando Valley and the SF valley (q&c) wanted to recognize two extraordinary community leaders, Juliana Oceguera and Juan Hernandez. The White House and the City of Los Angeles Mayor Garcetti also gave recognition for their work, dedication, and impact in the San Fernando Valley. Thank you Chase for Business! Your initiative with your $30 Billion Racial Equity Community to underserved communities. Thanks to this commitment we are seeing hope through Juliana for the community. We see how dedicated she is in helping those that need the help, which is much appreciated in the San Fernando Valley. #leadership #communityleaders #business #racialequity #thankyou

Housing Action Illinois would like to extend a heartfelt thank you to our Platinum Sponsor for our 35th Anniversary and #HousingMatters2022

Evermont Project uses NMTC to Bring Affordable Housing and Community Development to Site of LA Uprising:

CPC’s Tracey Combs joined longtime CPC customer DePaul & partners to celebrate the completion of this supportive & #affordablehousing project.

Housing Action Illinois would like to extend a heartfelt thank you to our Platinum Sponsor for our 35th Anniversary and #HousingMatters2022

There are 7 top banks (wellsfargo, citi, bankofamerica) that must act on the reparations demands of black communities.

-- CEASE FINANCING THE GENOCIDE OF BLACK PEOPLE BY DEVISING FROM LAW ENFORCEMENT AGENCIES THAT ARE MURDERING OUR LOVED ONES & THE RUGGED PROSECUTORS WHO REFUSE TO HOLD THEM ACCOUNTABLE
-- PAY REPARATIONS TO THE FAMILIES & COMMUNITIES THAT HAVE BEEN DEVIATeD IN a U.S.
-- CEASE ALL PREDATORY MEANS OF SATANISING BLACK WEALTH
-- PAY REPARATIONS FOR THE FINANCIAL HARDSHIPS YOUR INSTITUTIONS PRACTICE IN BLACK COMMUNITIES
-- MAKE EQUITABLE INVESTMENTS IN COMMUNITIES WHERE YOUR INSTITUTIONS DEHY DEAD BLACK PEOPLE EMPLOYMENT OPPORTUNITIES
-- AUDiT THE PROGRAMS DESIGNED TO HELP BLACK COMMUNITIES & MAKE ADJUSTMENTS TO HAVE THESE PROGRAMS MORE EFFICIENT
-- CEASE FINANCING CORRUPT POLICIANS & POLICIES THAT CONTINUE TO OPPRESS BLACK COMMUNITIES

PAY REPARATIONS FOR THE FINANCIAL HARDSHIPS YOUR INSTITUTIONS PRACTICE IN BLACK COMMUNITIES

PAY REPARATIONS TO THE FAMILIES & COMMUNITIES THAT HAVE BEEN DEVIATeD IN a U.S.

PAY REPARATIONS FOR THE FINANCIAL HARDSHIPS YOUR INSTITUTIONS PRACTICE IN BLACK COMMUNITIES

PAY REPARATIONS TO THE FAMILIES & COMMUNITIES THAT HAVE BEEN DEVIATeD IN a U.S.

PAY REPARATIONS TO THE FAMILIES & COMMUNITIES THAT HAVE BEEN DEVIATeD IN a U.S.

PAY REPARATIONS TO THE FAMILIES & COMMUNITIES THAT HAVE BEEN DEVIATeD IN a U.S.

PAY REPARATIONS TO THE FAMILIES & COMMUNITIES THAT HAVE BEEN DEVIATeD IN a U.S.
WE DID IT! Thank you to everyone who joined us Saturday, September 24th on the rooftop of the Sutter Club for the 9th annual Hard Hats and High Heels Gala!

With a goal of $350,000, this sold out event raised over $468,000 to build and repair for low-income families, seniors, and veterans in our region. Stay tuned for the recap video coming soon!

Photo credit: taggmenow and Cornelius.

Presenting Sponsor: mysmud

Hope Builder Sponsor: usbank

Future Framers Sponsors: officialkumpabanks, chase bank, lapis.design, headwaters, building, healthnet, capitalbancard, dp3construction, interior, insurance, Precision Fluid Controls, neenans, haydenpark, brewwave, veteran, veterinary, hospital and venetiaoptometrists


FIZZ Sponsor: hotmuc

Wine Sponsor: singlewineyards

Production Team: Megan Swan and Mike Droke

Entertainment: larriahj, stefanomusic, beatfleetdjs, saccdt, aerialist jewelle_of_the_nile, and feelosophymusic

More photos in the link in our bio, and video recap coming soon!

#TogetherWeBuild #HabitatGala

More photos in the link in our bio, and video recap coming soon!

Wine Sponsor: singlewineyards

Production Team: Megan Swan and Mike Droke

Entertainment: larriahj, stefanomusic, beatfleetdjs, saccdt, aerialist jewelle_of_the_nile, and feelosophymusic

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If you missed last Saturday's sold out Habitat Gala on the Sutter Club rooftop, or if you want to relive the magical night, check out this Gala recap and thank you video! This year, we raised a total of $449,168 to build and repair for low-income families, seniors, and veterans in our region! A huge thank you to the Sutter Club for hosting, as well as our amazing sponsors and partners:

Presenting Sponsor: mysmud
Hope Builder Sponsor: usbank
Future Framer Sponsor: officelayouts/qubes, chase bank, lpa, design, headwest, building, Health Net, capitalbridge, dcp, construction, interior, insurance, Precision Fluid Controls, mcr, banta, broadway, veterinary, hospital, and venetianpethospital
Real Estate Sponsor: Home of the Week: Janesville Engineering, D & D Security, Sutter Club, ACME, Sutter Reserve, Fizzy sponsor: boglewineyards
Production Team: Megan Swan and Mike Droke
Entertainment: (ahead) show music, beatfeastly, scent, retail jeweal of the reel, and feel sooo much
Credit: weddings@productions
Photo credit: tiagemmell and cmac2u
Videography: seastandproductions
Production Team: Megan Swan and Mike Droke
Wine Sponsor: boglevineyards
FIZZ Sponsor: fizzinsac

Over the past year, 150 volunteers from @JPMorganChase have served nearly 300 hours at our Volunteer Action Center.

#TogetherWeBuild #HabitatGala
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**2022 TWITTER**
11/18/2022 Today, we welcomed back volunteers from @JPMorgan @Chase to our Clifford Street build site. The volunteers helped us with interior blocking as well as additional siding installation! # BUILDforCommunity # BUILDforCommunityAgoodee # BUILDatHome # community pic.twitter.com/4c2zE7vQ90
New York, Newark, NJ-NJ-CT-PA

**2022 INSTAGRAM**
12/2/2022 THE WHITE WALL BANKING TO BLACK
_caption: AND ROUND INTERVIEWING EMILY RUTTER ON HER BOOK "THE WHITE WALL" (HOW BIG FINANCE BANKRUPTCIES BLACK AMERICA)
_@iamwesmoore @jpmorgan @Chase @MayorBMScott

Be careful with @chase, they have a record of stealing low-income people's money. Chase is bad for working-class American people.

@Chase is helping support community development projects in underserved and low-income communities: wapo.st/3XB6ffU

COLLECTIVELY WORTH @US BANCORP @THE BLACKS DEMAND

TRAFFIC BANKHOL DS

WASHINGTON-BALTIMORE-ARLINGTON, DC-VA-WV-PA CSA

**2022 INSTAGRAM**
12/2/2022 BANKING TO BLACK
_caption: AND ROUND INTERVIEWING EMILY RUTTER ON HER BOOK "THE WHITE WALL" (HOW BIG FINANCE BANKRUPTCIES BLACK AMERICA)
_@iamwesmoore @jpmorgan @Chase @MayorBMScott

Banks are helping support community development projects in underserved and low-income communities: wapo.st/3XB6ffU

COLLECTIVELY WORTH 13 "TRILLION" IN ASSETS

1a. DIVERT FROM LAW ENFORCEMENT AGENCIES & PROSECUTOR WHO REFUSE TO HOLD LAW ENFORCEMENT ACCOUNTABLE
1b. REPARATIONS FOR THE BLACKS AFFECTED BY STATE SANCTIONED TERRORISM
2a. CEASE PREATORY LOANS & OTHER MEANS OF REINVESTING
2b. REPAIRS FOR FAMILIES WHO WERE COMELED OUT OF THEIR HOMES
3a. DIVERT FROM THE PRISON INDUSTRIAL COMPLEX (PIC) & POLICES THAT CRIMINALIZE THE BLACKS
3b. REPAIRS FOR THE BLACKS WHO HAVE BEEN DEVEATED BY THE PIC

Los Angeles-Long Beach, CA CSA

**2022 TWITTER**
12/5/2022 Black Britain, founder of Geners Partners, is taking on D.C.'s housing crisis. With help from @JPMorgan @Chase, this partnership is providing Britain's company with both debt funding and Low-Income Housing Tax Credits: wapo.st/3CGw5EU
Washington-Baltimore-Arlington, DC-VA-WV-PA CSA

**2022 TWITTER**
12/5/2022 A new birth center in the heart of D.C., Vard Full is helping close the health care gap for mothers. Learn more about the MMC program from @JPMorgan @Chase is helping support community development projects in underserved and low-income community: wapo.st/3COLjEU
Washington-Baltimore-Arlington, DC-VA-WV-PA CSA

**2022 TWITTER**
12/8/2022 @iamwesmoore @jpmorgan @Chase @MayorBMScott Be careful with @chase, they have a record of stealing low-income people's money. Chase is bad for working-class American people.

Join @iamwesmoore hit the ground running. #chase great investment in the community.

Washington-Baltimore-Arlington, DC-VA-WV-PA CSA

**2022 INSTAGRAM**
12/9/2022 @iamwesmoore hit the ground running. #chase great investment in the community.

Washington-Baltimore-Arlington, DC-VA-WV-PA CSA

**2022 INSTAGRAM**
12/13/2022 #habitatforhumanity #habitatcfc #jpmorgan #chase #volunteer #goodworks #build #home #community pic.twitter.com/AEWhTBQxV0

Washington-Baltimore-Arlington, DC-VA-WV-PA CSA

**2022 INSTAGRAM**
12/10/2022 #habitatforhumanity #habitatcfc #jpmorgan #chase #volunteer #goodworks #build #home #community pic.twitter.com/0QrG3SrE6A

Los Angeles-Long Beach, CA CSA

**2022 INSTAGRAM**
12/10/2022 #habitatforhumanity #habitatcfc #jpmorgan #chase #volunteer #goodworks #build #home #community pic.twitter.com/0QrG3SrE6A

Los Angeles-Long Beach, CA CSA

**2022 TWITTER**
12/13/2022 You’re invited to attend the #BuildingGenerationalWealthinOurCommunities workshop. Hear from local real estate experts and learn about available resources! @Chase 6pm at the #MillionDollarsTech Info. Be sure to register using the QR code on the images. pic.twitter.com/TUu2ZXLuJB
Cleveland-Akron-Canton, OH CSA
Does your bank openly support small and minority owned businesses?

Chase said the answer is YES! Chase is showcasing businesses and offering resources for small and minority owned business.

As a business owner you must leverage all contacts to help you achieve your goals. This includes:

- Past clients
- City & government entities
- Your Bank

Make sure to head to my link in bio. I offer several free resources made for new business owners!

BREAK THE BANK

"[BLACK] PEOPLE DON'T NEED MORE LOANS... WE NEED HELP PAYING THEM"

JOIN THE MOVEMENT 👉🏿 JOIN THE MOVEMENT 👉🏿 EMANCIPATION FROM EXPLOITATION

DR SARAH FEDERMAN TESTIFIES BEFORE THE HOUSE FINANCIAL SERVICES COMMITTEE

Mega Bank Week: 16 Fri Dec 16th
Wells Fargo Week: 19 Sat Dec 19th
The Blacks Demand
The 7 Mega Banks & Their CEOs
Bankofamerica - Brian Moynihan
JPMorgan Chase - Jamie Dimon
PNC - William Demchak
CITI - William Rogers Jr
US Bank Corp - Andy Cecere
Truist - Charles Scharf

Collectively Worth 1.3 TRILLION in assets

1a. Divest from law enforcement agencies & prosecutors who refuse to hold law enforcement accountable
1b. Reparations for the Blacks affected by state-sanctioned terrorism
2a. Cease predatory loans & other means of redlining
2b. Divest from the prison industrial complex (PIC) & policies that criminalize the Blacks
3a. Reparations for the Blacks who have been devastated by the PIC
3b. Reparations for descendants of Africans who were enslaved in the U.S.
4a. Cease sabotaging Black wealth
4b. Reparations for the financial hardships your institutions practiced in Black communities
4c. Cease sabotaging Black wealth
4d. Make equitable investments in communities where your institutions deny the Blacks employment opportunities

Our CRCP Cheerleaders were thrilled to perform at the @Chase Bank Branch Opening and Ribbon Cutting this morning, welcoming our new partners to the neighborhood!

Chase opens branch in Covent Blu-Grand Center neighborhood
30% of @Chase 's branches are in low-to-moderate-income areas
"Brown and Black people need to be a part of the dialogue,"
K. Michael Jones | St. Louis American

Redlining is illegal, but @Chase bank can "red dot" on the grounds of ideology...

*Note: Special characters and emojis may be edited to improve accessibility.
May 24, 2023

Jamie Diamond, CEO
Chase Bank
270 Park Avenue
New York, NY 10017

Dear Mr. Diamond,

This is a complain letter. I am a very dissatisfied, long-time customer of Chase Bank. I have checking and savings accounts, a business line of credit, and a HELOC at Chase. The two Chase Bank branches in Rowlett, Texas, are closed, one for the last several days and the other permanently. The sign on the door of the closed Rowlett Chase branch gives no information on why the branch is closed or where the nearest open Chase branch is located. What kind of mediocre customer service is this? You are paid $34.5 million per year and you can’t afford a sign on your Rowlett branch door indicating where the nearest Chase branch is located. You should be ashamed of yourself. It appears that you do not care one iota for customers. Your greed is shameful!

I want to know why the Rowlett Chase branch is closed and when it will be reopened. My mailing address is found above. My email address is [REDACTED CONTENT] and my phone number is [REDACTED CONTENT]. I am waiting for your return contact.

I repeat your greed is shameful!

[REDACTED CONTENT]
May 25, 2023

Office of the Controller of the Currency
340 Madison Ave., 5th Floor
New York, NY 10173-0002

Dear Sir or Madam,

I am writing to request that you contact Chase Bank and tell them to reopen their branches in Rowlett, Texas. Their closing of their two branches in Rowlett is causing serious harm and inconvenience to their customers in this city. Chase closed these branches without providing any prior notice, explaining why they have closed them, and without providing any information as to where the nearest Chase branches are located. Chase’s terse closure notice on the door of one of its closed branches is an insult to its customers. The other Chase branch in Rowlett has been closed and put up for sale.

The banking industry in the country is exploiting its customers with usurious interest rates, cutbacks in services and locations, and an attitude of sheer indifference.

As the federal agency that regulates the banking industry, you should take action to force Chase to open at least one branch in Rowlett, Texas, inform its customers where this branch will be located, and to fine Chase for this violation of basic customer service.

See the attached copy of the letter that I have sent to the CEO of Chase.

I thank you and look forward to your prompt remedial regulatory action in this matter.

Thank you.

Sincerely,

[REDACTED CONTENT]
Thank you for sharing your concerns

Dear [REDACTED CONTENT]:

We are responding to your complaint about the status of our branch location in your city, and your request to keep the branch open. You requested to speak with Jamie Dimon. We reviewed your complaint on his behalf. Thank you for sharing your concerns.

We appreciate you taking the time to bring this to our attention. Your feedback helps us serve you better. Our goal is to give exceptional service every time you contact us.

Our Rowlett branch was temporarily closed for maintenance due to an Environmental Health and Safety issue but is open now. We ensured there were proper signs informing about the closure and instructing our customers to search for the nearest branch on chase.com. We also have several branch locations within five miles from our Rowlett branch.

We welcome your feedback. Please accept our apologies for the inconvenience this matter caused you.

Thank you for banking with us. If you have questions, please call us at 1-877-805-8049 and reference case number [REDACTED CONTENT]. We accept operator relay calls. We’re here Monday through Friday from 8 a.m. to 9 p.m. and Saturday from 9 a.m. to 6 p.m. Eastern Time.

Sincerely,

Executive Office
1-877-805-8049
1-866-535-3403 Fax; it’s free from any Chase branch
executive.office@chase.com
chase.com
[REDACTED CONTENT]:

On behalf on Black United Fund of Michigan (BUF of MI), thank you for your awesome presentation on July 27th as part of our Youth Careers Exploratory Academy. You helped to make the Academy a huge success! The students remarked in their evaluation that you thoroughly engaged them in learning more about money. On the last day upon receiving their stipends, a number of parents remarked that their child was insisting they open an account with Chase.

Again, BUF appreciates your partnership and looks forward to other collaborative projects.

Stay blessed!

[REDACTED CONTENT]
Program Director - BUF of MI.
[REDACTED CONTENT]
Customer Comments

**Customer Comments**

Experian has been providing inaccurate credit report data to lenders upon request, that contain data that does NOT actually exist on my credit report, but HAS GREATLY AFFECTED APPROVAL ODDS; Such as, (FALSE REPORTING - "BANKRUPTCY/PUBLIC RECORD") when neither exist on my credit report! October 1st 2023, JPMCP pulled my report and I did NOT receive any alert or reference number. An error message of "cannot process, try again later" appeared after my request. I was not aware this inquiry had been actually processed due to the error message and lack of notification, reference number nor alert from JPMCP nor Experian, and it's being hidden in Plain sight. The inquiries on my file are listed in chronological order EXCEPT JPMCP which should have been the first inquiry listed, but instead it is listed between the months of May. Although, it's October and the last inquiry requested this year. Upon calling JPMCP for further information about this inquiry, I was then informed the request had been DECLINED for several reasons such as: Too many inquiries, PUBLIC RECORD / BANKRUPTCY and several other adverse reasons that are NOT RELEVANT OR INCLUSIVE TO CREDIT APPROVAL. Experian is also screening my calls. Unable to speak with a live agent. Automated system claims my information (ssn and zip code) does not match, although it does. Experian claims their company only provides reports to lenders, but actually seems to be playing the initial hand in my applications being DECLINED/DENIED, by using subtle DISCRIMINATION through the forms of REDLINING, DISPARATE TREATMENT and DISPARATE IMPACT and CONTINUOUSLY denying me CREDIT, DESPITE having NO ADVERSE INFORMATION AND AN AVERAGE CREDIT SCORE in the upper 600s, based on INCONSISTENT BASIS OF APPROVAL. Violation of FAIR LENDING LAWS, FCRA, ECOA TITLE VII OF CFPB and the CIVIL RIGHTS ACT of 1866. My score, TAMPERED WITH, also dropped 10 points from this "hidden JMPCB inquiry" resulting in a DECLINED NOT DENIED APPLICATION. I WOULD NOT HAVE SO MANY INQUIRIES IF I were NOT targeted and profiled through UNFAIR LENDING PRACTICES such as, REDLINING, DISPARATE TREATMENT and DISPARATE IMPACT by Experian. EACH TIME I submit a request FOR CREDIT. FOR THE LAST 6 MONTHS I HAVE BEEN DEALING WITH UNFAIR/DECEPTIVE PRACTICES by Experian and others to the point of exhaustion! Bureaus should be REQUIRED to have more EFFECTIVE laws governing the practice and USE/DISTRIBUTION OF CONSUMER REPORTS with TRANSPARENCY.

JPMCB inquiry needs to be removed as well as ALL other inquiries made resulting in a declined/denial status due to UNFAIR LENDING and DISCRIMINATION from Experian. Credit score needs to be updated to reflect accuracy DUE TO UNFAIR LENDING AND DISCRIMINATION. CREDIT LOCK TO PREVENT INSIDE FROM TAKING ADVANTAGE OF CONSUMER REPORTS THROUGH UNFAIR LENDING PRACTICES AND DISCRIMINATION.
The credit inquiry is valid

Reference Number: [REDACTED CONTENT]

Dear [REDACTED CONTENT]:

We are responding to your concerns about the inquiry on your personal credit report for your business credit card account application. We appreciate the opportunity to assist you.

You applied for the Chase Visa signature business card account through the internet. The pre-approved credit card offer says that we will review your credit report and the information you provide to confirm that you meet the criteria for the offer.

We show you submitted two applications. When you apply for a credit card online, the Pricing and Terms information must be viewed before the application is submitted. Based on this review, you may receive a card with different costs, or you may not receive a card. For your convenience, we have enclosed a copy of the Pricing and Terms. We have also enclosed a copy of the credit decision letters dated October 1, 2023.

Information we send to the credit reporting agencies must accurately reflect your account activity and status. We won’t request to remove the inquiry because the information we supplied to the credit reporting agencies is accurate.

Please contact the credit reporting agencies directly about any inaccurate reporting and your request for a lock on your credit report as we are not able to speak on their behalf. We respectfully deny any of the alleged violations.

We take complaints that claim discrimination seriously. We do not tolerate any form of discrimination as it is strictly against our policy and contrary to our corporate culture.

If you have questions about this issue, please call Joan at 1-877-805-8049, extension [REDACTED CONTENT]. If you have other questions, please call us at the number below. We accept operator relay calls. Our office is available Monday through Friday from 8 a.m. to 9 p.m. and Saturday from 9 a.m. to 6 p.m. Eastern Time.

Sincerely,

Card Executive Office
1-877-805-8049
1-847-787-5509 Fax; it’s free from any Chase branch
executive.office@chase.com
chase.com
Comment: Bakersfield, CA Written Comments  
Date Submitted: 10/12/23  
Submitted Via: CFPB Online Customer Complaint Form

Customer Comments

Chase canceled my investment accounts in 2020 and closed all my accounts. I am still missing $2500 from my accounts that Chase closed. I tried several times to contact the 800 number listed but was told they can not provide me with any information, but if I choose I can fill with the court but I don't have the money to pay attorneys fee. I applied for credit card with chase couple of months ago it was granted because I have good credit but I just got a letter from chase that they canceling my new credit card with any explanation. This is discrimination based on my race and National origin. Please could you follow up with my complaint to let chase Bank know that poor people have a voice in USA and the world.

Tell me why the company is discriminating against my race by refusing service to my race. I told them to investigate the situation may be it is mistaken identity but the people I have spoken to refused to listen but tell me to go to court.

*Note: Comments are verbatim from the submission to the online regulatory form; personal or sensitive information has been redacted.
October 26, 2023

The Deposit Account Agreement allows us to close an account at any time

Dear [REDACTED CONTENT]:

We are responding to your complaint about our decision to close your accounts. Thank you for sharing your concerns.

The Deposit Account Agreement allows us to close an account other than a CD at any time, for any reason or no reason, and without prior notice. We gave you a copy of the agreement when you opened the account. You can see the current agreement on chase.com. We made the decision to end the banking relationship. Our decision will not change, and we are not required to give a reason for closing an account.

We are closing your credit card account ending in [REDACTED CONTENT]

We sent you the enclosed letter dated September 27, 2023, letting you know that we could close your credit card account on October 26, 2023. We decline your request to provide additional information about our decision. We confirmed that your account was properly identified, and our decision is final. Our decision to close the credit card account is in accordance with your enclosed Cardmember Agreement.

Here’s information about your rewards

You can access eligible rewards for at least 30 days from the closure date of your account. After that time, they will no longer be available. We review accounts according to the rewards terms and conditions, which could result in your reward points being forfeited. For some credit cards, redemption options may be limited after your account is closed. We have enclosed a copy of the program Rules and Regulations for your review.

Every individual has a unique credit profile, so we cannot advise you on how the closure of your account may affect your credit. Please contact the credit reporting agencies directly about your credit concerns.

Here’s the contact information for the four credit reporting agencies:

Equifax
PO Box 740256
Atlanta, GA 30374-0256
1-888-378-4329
equifax.com

Experian
PO Box 9701
Allen, TX 75013
1-800-493-1058
experian.com

Innovis
PO Box 1640
Pittsburgh, PA 15230-1640
1-800-540-2505
innovis.com

TransUnion
PO Box 2000
Chester, PA 19022-2000
1-800-916-8800
transunion.com

We take complaints that claim discrimination seriously. We do not tolerate any form of discrimination as it is strictly against our policy and contrary to our corporate culture.

If you have questions, please call us at 1-877-805-8049 and reference case number [REDACTED CONTENT]. We accept operator relay calls. We’re here Monday through Friday from 8 a.m. to 9 p.m. and Saturday from 9 a.m. to 6 p.m. Eastern Time.
Sincerely,

Executive Office
1-877-805-8049
1-866-535-3403 Fax; it's free from any Chase branch
chase.com
executive.office@chase.com
Customer Comments

SUMMARY: Chase is getting out of the safe deposit box business. When they close branches, they are instructing customers to come into the branch and remove the contents of their safe deposit boxes. Customers pay an annual fee in advance for these safe deposit boxes, but when Chase forces customers to vacate the boxes, they are refusing to offer customers a refund of their annual fees (or even a prorated amount of the annual fee). As Chase continues to close branches -- or eventually removes safe deposit boxes from existing branches -- they are retaining anywhere from $50 to $200 per customer times the thousands of boxes that will be vacated. For me this was $80, but when you add it up, this may total in the millions of dollars.

DETAILS:

I have had a safe deposit box at the Chase Bank (formerly Washington Mutual) at 5464 Sand Point Way NE, Seattle, WA 98105 since 2005. My most recent $80 annual fee for the box was paid via automatic withdrawal from my Checking Account on 7/5/23. A month later on August 18, 2023, Chase sent me a letter (attached) informing me that the branch was closing, mentioning that if I have a Safe Deposit Box, I would receive a separate letter with information about removing its contents. On August 25, 2023 and September 15, 2023, Chase sent a letter (attached) titled "Important information about your safe deposit box", saying "The branch at 5464 Sand Point Way NE, Seattle, is closing, so you'll need to come in and remove the property in you safe deposit box and cancel your lease by October 26th. We're sorry for the inconvenience." On 10/16/23, I went into the branch to empty my safe deposit box (and close my Checking and Savings accounts), and the branch employee told me that Chase was not refunding the safe deposit fees for any of their customers in the branch. She explained that she was upset by this, as have the many customers who have already visited to empty their boxes. However, she explained that the branch manager told all employees explicitly that no refunds would be made and that customers should file a complaint with Chase's central office. She gave me a piece of paper (attached) that had preprinted the complaint contact location on their website (chase.com/sendusfeedback) or a PO Box in Indianapolis (jpmorgan chase bank n/a, po box 44945, Indianapolis, IN 46204-4945).

Chase.com/sendusfeedback says you can contact Chase via Secure Message, Phone, or Social Media (Twitter). I found an 800-number for Checking Account support. The rep I told me he understood my frustration about this issue, but that the phone agents were not authorized to issue a refund. He said that this was a Branch issue, that the Branch has misinformed me, and I should go back to the Branch and ask them to issue a refund. I later tried to file a complaint via Send Us a Secure Message". The only category dropdown that allows you to write a secure message was under "SCRA-Military Inquiry." I submitted a complaint via the "SCRA-Military Inquiry" dropdown and received the following response (attached) via My Account on 10/18/23:

*Note: Comments are verbatim from the submission to the online regulatory form; personal or sensitive information has been redacted.*
"Hello [REDACTED CONTENT],

Thank you for contacting us.

[REDACTED CONTENT], we're sorry to know about your recent banking experience and apologize for the inconvenience this may have caused. We would like to resolve your concerns through the Secure Message Center; however, this issue can only be resolved in person. While we're unable to refund the fee, we'll share your feedback with the appropriate team. We understand this is important to you, and we ask for your patience.

If you need to contact us again, please send a secure message.

Sincerely,

[REDACTED CONTENT]

Chase Email Servicing."

On 10/20/23, I phoned the branch and complained again, this time to Derek. Derek said the only thing I could do is contact Chase at the numbers they provided me and I explained that the SendUsFeedback contact was not helpful. He said that the only thing he could do is file a complaint on my behalf, as he has done for many other customers who are upset about this.

**THIS really feels like something that should be addressed with Chase via a Class Action Lawsuit. Although the individual dollar amounts are relatively small, when multiplied by all the customers impacted by this, the number is significant. Chase is essentially stealing money from all these customers who trusted them to provide safe deposit boxes in one-year terms.**
Customer Comments

SUMMARY: Chase is getting out of the safe deposit box business. When they close branches, they are instructing customers to come into the branch and remove the contents of their safe deposit boxes. Customers pay an annual fee in advance for these safe deposit boxes, but when Chase forces customers to vacate the boxes, they are refusing to offer customers a refund of their annual fees (or even a prorated amount of the annual fee). As Chase continues to close branches -- or eventually removes safe deposit boxes from existing branches -- they are retaining anywhere from $50 to $200 per customer times the thousands of boxes that will be vacated. For me this was $80, but when you add it up, this may total in the millions of dollars.

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"Hello [REDACTED CONTENT],

*Note: Comments are verbatim from the submission to the online regulatory form; personal or sensitive information has been redacted.*
Customer Comments Received via Regulatory Agency Website*

Thank you for contacting us.

[REDACTED CONTENT], we're sorry to know about your recent banking experience and apologize for the inconvenience this may have caused. We would like to resolve your concerns through the Secure Message Center; however, this issue can only be resolved in person. While we're unable to refund the fee, we'll share your feedback with the appropriate team. We understand this is important to you, and we ask for your patience.

If you need to contact us again, please send a secure message.

Sincerely,

[REDACTED CONTENT]

Chase Email Servicing."

On 10/20/23, I phoned the branch and complained again, this time to Derek. Derek said the only thing I could do is contact Chase at the numbers they provided me and I explained that the SendUsFeedback contact was not helpful. He said that the only thing he could do is file a complaint on my behalf, as he has done for many other customers who are upset about this.

**THIS really feels like something that should be addressed with Chase via a Class Action Lawsuit. Although the individual dollar amounts are relatively small, when multiplied by all the customers impacted by this, the number is significant. Chase is essentially stealing money from all these customers who trusted them to provide safe deposit boxes in one-year terms.**

*Note: Comments are verbatim from the submission to the online regulatory form; personal or sensitive information has been redacted.
November 14, 2023

[REDACTED CONTENT]
[REDACTED CONTENT]
Seattle, WA 98105

We are working on providing a prorated refund

Dear [REDACTED CONTENT]:

We are responding to your complaint about annual fee for your Safe Deposit Box and your service experience. Thank you for sharing your concerns.

Your feedback helps us serve you better. We aim to give exceptional service and are sorry that we did not meet this goal when you contacted us about the Safe Deposit Box annual fee.

We are currently under a stop sale so no new boxes or box transfers can be done at this time. This is what was normally offered to customers when a branch closed, so unfortunately when a branch with Safe Deposit Boxes is closed currently that is not an option. A Safe Deposit Box rental fee of $80.00 was deducted from your account ending in [REDACTED CONTENT] on July 5, 2023, for the annual rental fee. We cannot refund the annual fee due because we did not find a bank error.

We are currently working on a look back correction to provide prorated refunds. Eligible customers will receive a prorated refund in the mail, at this time we do not have an ETA for when checks will arrive. We will send checks to the address on file, please notify us if your address has changed.

If you have questions, please call us at 1-877-805-8049 and reference case [REDACTED CONTENT]. We accept operator relay calls. We’re here Monday through Friday from 8 a.m. to 9 p.m. and Saturday from 9 a.m. to 6 p.m. Eastern Time.

Sincerely,

Executive Office
1-877-805-8049
1-866-535-3403 Fax; it’s free from any Chase branch
chase.com
executive.office@chase.com
October 30, 2023

To Whom it May Concern,

The Cities for Financial Empowerment Fund (CFE Fund) encourages the Office of the Comptroller of the Currency (OCC) to give favorable consideration to JPMorgan Chase (JPMC) as part of the Community Reinvestment Act (CRA) examination, in recognition of JPMC’s significant investment in supporting national banking access efforts as outlined below. Throughout our multi-year partnership, JPMC has shown a strong commitment to community engagement and has exemplified leadership within the financial empowerment and financial services field.

The CFE Fund’s Bank On movement works to ensure that everyone has access to a safe, affordable banking account; thanks to sustained Bank On seed support from JPMC, Bank On has become a national movement meaningfully expanding banking access as a cornerstone of financial stability. Since 2013, JPMC designed its support to enable the CFE Fund to create critical central national infrastructure to support local and state coalition banking access efforts; engage financial institutions large and small in offering Bank On certified accounts; bring millions of Americans into the stabilizing financial mainstream; and liaise with federal regulators, state agencies, and other stakeholders to advance this work.

JPMC’s seed support of the Bank On movement has helped the CFE Fund and partners invest in connecting certified Bank On accounts to program and payment opportunities. Connecting safe banking accounts to existing government and nonprofit programs that utilize payments, reimbursements, stipends, and refunds has resulted in expanding banking access at nationwide scale. As the largest example, during the COVID-19 pandemic the Bank On movement partnered with the Department of Treasury, the Federal Deposit Insurance Corporation (FDIC) and other federal partners, along with dozens of financial institutions and Bank On coalitions, encouraging residents to open a Bank On certified account to receive their Economic Impact (stimulus) payment, unemployment compensation, and Child Tax Credit payments via direct deposit. In their 2021 National Survey of Unbanked and Underbanked Households, the FDIC highlighted that over a third (35%) of recently banked households reported that receiving a government benefit payment contributed to opening a bank account, underscoring the importance of JPMC’s support of this key Bank On and federal regulator strategy to help people get banked.

In addition to JPMC seed funding support, their investment also has leveraged additional philanthropic dollars. With them, the CFE Fund then has granted over $2 million to 115 community nonprofits and municipal governments through a suite of grant and technical assistance offerings, outlined below:
- Bank On Startup Grants, to support brand-new coalitions in launching operations: 53 grants totaling $443,000
- Bank On Capacity Grants, to support dedicated coalition leadership: 49 grants totaling $1,190,000
- Bank On Innovation Grants, to test new replicable methods of banking access integrations: 8 grants totaling $169,500
- Wages Connect, a pilot program integrating banking access into workforce development: 5 grants totaling $220,000

In addition to these grants, JPMC support enables the CFE Fund to provide robust technical assistance to coalition leaders, including a biennial leadership and management training, a biennial national conference, and access to CFE Fund communications and marketing materials.

Beyond supporting the CFE Fund’s national Bank On efforts, JPMC also has been a leader in the larger banking access and financial inclusion fields. JPMC is active in most local and state Bank On coalitions, providing leadership, marketing and outreach guidance, and participating in networking opportunities. Additionally, JPMC was one of the first financial institutions in the country to create their own Bank On certified account (initially the prepaid card, Liquid, and now a full checking account, Secure Banking). JPMC also voluntarily reports data about their certified account to the Bank On National Data Hub, a centralized Bank On reporting platform that the CFE Fund manages in partnership with the Federal Reserve Bank of St. Louis. Thanks to JPMC’s Secure Banking account, millions of people who may otherwise been outside the financial mainstream now have access to safe banking.

Thanks in large part to JPMC’s ongoing seed investment, the market of safe and affordable Bank On certified accounts is flourishing and has grown exponentially since the Bank On National Account Standards were first released in 2015. Bank On accounts are now available in more than 50% of branches throughout the country and are impacting underserved communities: nearly 96% of low- and moderate-income households live within one mile of a branch offering a Bank On certified account. Additionally, the Bank On National Data Hub shows that across just 28 reporting institutions, there have been more than 14 million Bank On certified accounts opened to date. Further, approximately 80% of accounts opened are opened by customers completely new to that financial institution, a proxy for bringing consumers into the financial mainstream. Bank On has been embraced by the FDIC, Office of the Comptroller of the Currency, and the Federal Reserve. JPMC representatives joined FDIC Chairman Martin J. Gruenberg and Acting Comptroller of the Currency Michael J. Hsu in Washington D.C. earlier this year to speak at our Bank On National Conference, highlighting the momentum of Bank On across the country.
Financial institutions, municipalities, and local programs need leadership and coordinated resources for effective, sustainable Bank On programs and products. JPMC’s generous support and ongoing partnership with the CFE Fund and the Bank On movement exemplifies their dedication to improving the financial lives of low- to moderate-income families across the country. The CFE Fund strongly commends JPMC for its continued and highly productive support of national banking access efforts.

Sincerely,

[REDACTED CONTENT]
Senior Principal
Cities for Financial Empowerment Fund
November 14, 2023

Licensing Manager
Large Banks Licensing Operations
Office of the Comptroller of the Currency
400 7th Street SW
Washington, D.C. 20219

To Whom It May Concern:

I have been a Chase Customer at the Chase branch at 2904 N.Beltline Rd in Irving, Texas since the inception of its' habitation at this location, and prior to the location's being named "Chase". I was deeply saddened and disgusted to learn that the drive-up services will be discontinued on November 21, 2023!

This has been a tremendous convenience for customers with young children, elderly customers and customers dealing with health problems, to name a few. I wanted to assure that you knew how much of an inconvenience this would be for many who won't take the time to express their feelings to you.

In our current world, where customer service seems to be a thing of the past, this is yet another example that verifies the customer's unimportance. With rising gasoline costs, Chase customers who need drive-up service will be forced to spend more time and money to find them.

I would deeply appreciate anything that can be done to alleviate this.

Kind regards,
Thank you for sharing your concerns with us

Dear [REDACTED CONTENT]:

We are responding to your inquiry about the closure of our drive up service at our Irving branch. Thank you for sharing your concerns.

We closed the drive up service at our Irving branch location because of low transaction volumes. Three drive-up ATMs were retained at our other Irving locations. The branch locations are within a three mile radius from this location. We apologize for the inconvenience.

Here are the locations of our other branches in the area that offer drive up services:

- 111 East Irving Boulevard
- 545 East John Carpenter Freeway
- 5530 North Macarthur Boulevard

Your feedback and suggestions are very important to us, and we appreciate you sharing your thoughts.

Thank you for banking with us. If you have questions, please call us at 1-877-805-8049 and reference case number [REDACTED CONTENT]. We accept operator relay calls. We’re here Monday through Friday from 8 a.m. to 9 p.m. and Saturday from 9 a.m. to 6 p.m. Eastern Time.

Sincerely,

Executive Office
1-877-805-8049
1-866-535-3403 Fax; it’s free from any Chase branch
executive.office@chase.com
Customer Comments

I provided my Chase bank account information to my foreign university, so that the overage amount of my federal student loan could be wired to me to cover my living expenses for the semester. The loan was processed on November 12th. On November 21st, I called Chase Bank to request a status inquiry on any pending wire transfers listed under my account. I spoke with a representative who confirmed that he could see the transfer information, and I confirmed the amount and the sender. The same representative assured me that there was no hold on the transfer, and that it would be processed the following morning. The next afternoon, it still had not processed so I called again, and was told it would be handled the same day (November 22nd), and not to worry. Due to the holiday, I was unable to reach anyone from Chase Bank on November 23rd. Today, November 24th, I called Chase Bank again to request another status update, and I was informed that the bank had returned the wire transfer because I am not subscribed to one of their premium accounts and therefore I’m not entitled to participate in an international wire transfer in any capacity. This information was never clearly communicated to me and the negligence of withholding that information has caused me, and will continue to cause me further financial harm. I am a low income student, and they are denying me access to my own student loans to cover my living expenses. The solution I was offered was to visit a chase bank branch and open an account with a higher monthly fee. This is not a viable alternative. My bank account is in the negatives and Chase has denied a payment to me that would allow me to pay my rent. This is unacceptable and I am looking for any solution.
Executive Office (Mail Code OH4-7120)
3415 Vision Drive
Columbus, OH 43219

December 8, 2023

[REDACTED CONTENT]
[REDACTED CONTENT]
Memphis, TN 38135

Here is information about your account

Dear [REDACTED CONTENT]:

We are responding to your complaint about your wire transfer and your service experience. Thank you for sharing your concerns.

We appreciate you taking the time to tell us about our service. Your feedback helps us serve you better. We aim to give exceptional service and apologize for not meeting this goal when you contacted us.

We apologize for any misinformation you were given. Your Chase Secure Checking account ending in [REDACTED CONTENT] does not allow incoming or outgoing wire transfers. The features of your account are explained in the Additional Banking Services and Fees for Personal Accounts, which is a part of the Deposit Account Agreement. We gave you copies of both documents when the account was opened, and you can see the current versions by signing in to your account on chase.com.

We apologize for any inconvenience this matter has caused you; however, we respectfully decline your request for compensation as there was no error on our part. We recommend you call us at 1-800-935-9935 or visit a branch to see if one of our other checking accounts may fit your banking needs better.

We take complaints that claim discrimination seriously. We do not tolerate discrimination as it is strictly against our policy and contrary to our corporate culture.

Thank you for banking with us. If you have questions, please call us at 1-877-805-8049 and reference case number [REDACTED CONTENT]. We accept operator relay calls. We're here Monday through Friday from 8 a.m. to 9 p.m. and Saturday from 9 a.m. to 6 p.m. Eastern Time.

Sincerely,

Executive Office
1-877-805-8049
1-866-535-3403 Fax; it's free from any Chase branch
executive.office@chase.com
chase.com
Customer Comments Received via Regulatory Agency Website*

Comment: San Francisco, CA Written Comments  
Date Submitted: 12/7/2023  
Submitted Via: CFPB Online Customer Complaint Form

Customer Comments

I get a check from the County of San Francisco, also a Chase customer. It's a County Adult Assistance Program, and every month I get a check with my name and per a State regulation the [REDACTED CONTENT] is listed as a payee, it's all my money, the branch located at 1500 Polk in San Francisco lied to me for the fourth time and claimed I couldn't deposit the check, I then went home and easily deposited it on the app. But Chase has structured their algorithms and or A I to flag all checks of this kind for a two day hold. A supervisor lied to me, putting me on hold for almost 30 minutes claiming she was releasing the funds, only to come back and stick to her original decision. Another customer service agent lied and refused to let me speak to a supervisor. Chase Bank discriminates based on race and economic class, and I have been victimized by it several times in front of other customers.

*Note: Comments are verbatim from the submission to the online regulatory form; personal or sensitive information has been redacted.
December 20, 2023

Your funds were made available to you on December 7

Dear [REDACTED CONTENT]:

We are responding to your complaint about a check you deposited and your service experience. Thank you for sharing your concerns.

We appreciate you taking the time to tell us about our service. Your feedback helps us serve you better. We aim to give exceptional service and are sorry that we did not meet this goal when you visited the branch and contacted us by phone about the check you deposited.

We take complaints that claim discrimination seriously. We do not tolerate any form of discrimination as it is strictly against our policy and contrary to our corporate culture.

The check you deposited on December 5, 2023, for $688.27 required additional review. The deposit hold expired on December 6 and your funds were available on December 7. We’ve enclosed a copy of the check you deposited for your review.

Any check deposited into an account is subject to secondary review. We may not make the funds you deposit by check available until the seventh business day after the day of your deposit. The Deposit Account Agreement (DAA) has additional information about our Funds Availability Policy. You were provided a copy of the agreement when you opened the account. You can see the current agreement on chase.com.

Thank you for banking with us. If you have questions, please call us at 1-877-805-8049 and reference case number [REDACTED CONTENT]. We accept operator relay calls. We’re here Monday through Friday from 8 a.m. to 9 p.m. and Saturday from 9 a.m. to 6 p.m. Eastern Time.

Sincerely,

Executive Office
1-877-805-8049
1-866-535-3403 Fax; it’s free from any Chase branch
executive.office@chase.com
chase.com
December 8, 2023

[REDACTED CONTENT]
c/o JPMorgan Chase
[REDACTED CONTENT]
Miami, FL 33131

Dear [REDACTED CONTENT],

Thank you, [REDACTED CONTENT] - to you and JPMorgan Chase – for your continued support of Hispanic Unity of Florida’s (HUF) clients and our community. We would like to extend our deepest gratitude for your invaluable support as a Plenary Session Sponsor at the 2023 Entrepreneur Summit.

The impact of your sponsorship extended far beyond the event itself. Your contribution enabled 250+ aspiring and emerging entrepreneurs to connect with subject matter experts from diverse sectors, fostering an environment of learning, networking, and inspiration. Your dedication to supporting entrepreneurs at all levels reflects your company's profound commitment to the growth and vitality of our business community.

Our mission, our vision, and our work are possible because you believe in us; because you share our values of helping our community reach its full potential.

Thank you, [REDACTED CONTENT] - to you and JPMorgan Chase - for your support. And thank you for sharing our dream of an inclusive and equitable community of successful children, strong families, and civically engaged individuals.

Marvelously yours,

[REDACTED CONTENT]
Vice President of Development
Hispanic Unity of Florida

Thank you for your contribution of $7,500 received on 11/14/2023. No goods or services were provided in exchange for this contribution. Hispanic Unity of Florida, Inc. is an exempt organization as described in Section 501(c)(3) of the Internal Revenue Code; EIN 59-2230272. Please remember us in your will or living trust. Please save this gift acknowledgement for your tax return.
Comment
Cottage Grove

-- thanks for calling. I didn't return your earlier call because I suspected, correctly, that Chase wasn't contacting me to
clarify the situation. It was April 23, 2020, and Chase had just announced it would be closing its branch in Dupont Circle.

At the time, I was in the process of trying to find another branch to open after Chase closed the one on Dupont Circle.

I tried to call Chase, but my attempts were met with silence. Then, I was promptly put on hold for what seemed like forever
before a representative finally answered. I tried to explain my situation, but she wasn't interested in listening. She only
wanted to sell me something else, but I was not interested in opening another account. I was already a Chase customer,
and I don't need another bank account. I am not interested in having another account as I don't need one, and I have
little confidence in Chase's ability to manage my accounts.

She did, however, escalate this to the "executive team". I received a call from a [redacted] (ext # [redacted]) from the executive team on 2/3, which I couldn't answer but did return the call 5 minutes later and another 8 times to date with
still nothing when I am not the person in the wrong, Chase left us. I have made close to 50 complaints with every branch
I have been to, I've contacted corporate numerous times I've made a complaints numerous times I've done everything humanly
possible to get Chase to see what having to drive the distance I have to, to get to a Chase bank is causing me severe
displeasure via this channel. Apologized for not being able to assist any further in the matter and will keep him in mind if we change
our policy in the future.

I feel like this is just the tip of the iceberg. If you want to know more, I am willing to provide more details. If you have
any questions or need further assistance, please feel free to contact me. Thank you.

Sincerely,
[Redacted]

Consumer's Name
[Redacted]

Branch
[Redacted]

Date
1/9/2023

Raw Text
1/20/2023

Comment*
1/15/2023

Date
3/30/2023

Comment
Seaford

not happy that he was forced to close his safety deposit box when our branch was closing/relocating to a new
location. In addition, he stated that the bank had failed to provide him with adequate notice of the closure. He
received a letter from Chase stating that his safety deposit box would be closed on a certain date, but he
believed that the bank should have given him more time to retrieve his belongings.

He also mentioned that the bank had failed to provide him with adequate notice of the change in the
savings bond policy. He stated that he had always been able to cash bonds over 200 face value, but
Chase had recently changed this policy. He felt that this was unfair and that he should be able to cash his
savings bonds at face value.

He requested a copy of the letter that Chase had sent him, as well as any information on the new savings
bond policy. He also requested a copy of the notice that Chase had sent him about the closure of his safety
deposit box. He felt that these documents were important to his case and that he should be able to review
them.

He also expressed concern about the closing of the Seaford branch. He felt that this was a bad decision
and that Chase should have done more to inform the community about the closure. He believed that the
branch had been an important part of the community for many years and that its closure was a loss for the
area.

He requested that Chase consider reopening the branch or finding another location to serve the
community. He felt that the closure of the branch was a mistake and that Chase should rethink its decision.

He also requested a meeting with a representative of Chase to discuss his concerns. He felt that this
would be the best way to address his concerns and to find a solution to the problems that he was
experiencing.

He also requested that Chase consider providing financial assistance to the community in the form of a
grant or donation. He felt that this would be a good way to help the community during this difficult
time.

He also requested that Chase consider providing a complimentary service to the community, such as a
free check-writing service or a free financial education program. He felt that this would be a good way
to help the community during this difficult time.

He also requested that Chase consider providing a complimentary service to the community, such as a
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free check-writing service or a free financial education program. He felt that this would be a good way
to help the community during this difficult time.
Dear Mr. Dimon,

I am writing to protest Chase’s decision to close the branch at 3868 N Lincoln. Although looking at the map of nearby alternative Chase banks shows that there are other Chase banks within walking distance, none of the alternatives provide the same welcoming atmosphere that you have created at 3868 N Lincoln.

The small size of the bank adds to its welcoming atmosphere, too. Several of the bankers at this location know me by name and are easy to talk to. I have always appreciated the small size of the bank because it feels like a personal service bank. I hope that the present staff will not be affected by this "retrenchment."”

As someone who has tried several different banks over the years, I can attest to the fact that Chase is quite unique in its ability to combine profitability and community involvement. I have been a client of Chase for many years. Even though I have moved and my primary residence has changed, I continue to use Chase because of the personalized service and the welcoming atmosphere.

I am writing to protest Chase’s closing of the branch at 3868 N Lincoln. Although looking at the map of nearby alternative Chase banks shows that there are other Chase banks within walking distance, none of the alternatives provide the same welcoming atmosphere that you have created at 3868 N Lincoln.

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Sincerely,

[REDACTED CONTENT]
Hi Mr. Jamie Dimon,

It is with great disappointment that I write to you today. I am a long-time customer of Chase, having opened my account in 1981. I have always been happy with Chase until recently, when I began to notice a series of decisions that have left me feeling duped and disrespected. These decisions have been made without consideration for the needs and preferences of long-term customers like myself.

Firstly, the decision to close the Chase branch on Farnsworth in Aurora was a shock. As someone who has been a customer for decades, I expected to be able to continue banking at the same location. The closing has forced me to search for a new branch, which is an inconvenience I did not anticipate. I have a safe deposit box here, and I am concerned about the future of this service. I have been in contact with Chase representatives, who have been unable to provide a satisfactory solution.

Secondly, the recent decision to stop offering safe deposit boxes in banks is the stupidest short-term thinking I've ever seen since becoming your customer in 1981. I am sure you are aware that these facilities are an important part of the community and provide a safe place for customers to store valuables. The move to close these boxes is not only inconvenient for customers but also a loss for the wider community.

I have filed a complaint with the FDIC concerning this matter not only for me but for the hundreds of consumers that have already experienced the branch closure and have been to the branch when we closed the safe deposit box - due to the branch closing - and was told we would not receive a prorated refund. The ATMs at Figueroa and Seven are in no way an acceptable replacement.

I know it is not your department but if possible let the responsible management know that a lot of people in the neighborhood are upset about the branch closing. I understand the significance of your imports about the Safe Deposit Box Annual Fee. I believe it is a pleasure to address your concerns, and while we want to help you and make sure that you receive the refund you are entitled to under the terms of your agreement, we are required to have a process to address refunds of this nature accordingly.

This move has helped you with regard to a refund of the Safe Deposit Box Annual Fee but it seems something small can be gained.

Please visit any of our branches for assistance. You can return directly scheduling a meeting in the Chase MobileApp or by calling us.

Best regards,
[Redacted]

Client went to Rayford branch and they were closed too and this really upset client. He had things to do and running around to different branches that were closed. He was asked to pay a fee for a service that was not available to him. He said he is taking his money to a different bank because of the recent closing of SDB’s.

Client wanted to Jaime Dimon to know that he is not happy with this short sighted decision. Not happy that no one suggested a CD so he could make more money off his $191,000+.

He is not happy with Chase for this type of behavior and will definitely take his business elsewhere. He said he is taking his money to a different bank because of the recent closing of SDB’s. Client wanted Jaime Dimon to know that he is not happy with this short sighted decision.

He was upset with Chase for this move. He said he is taking his money to a different bank because of the recent closing of SDB’s. He was upset that no one suggested a CD so he could make more money off his $191,000+

Client is unhappy with the decision of the Chase branch in Aurora on Farnsworth closing down. He has his safe deposit box here and is upset with this recent closing. He was upset with Chase for this move. He said he is taking his money to a different bank because of the recent closing of SDB’s.

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I am writing to you this morning about the last and only branch left in Farmingdale, NY on Broadhollow Rd. It’s a shame that you closed the closure of this location.

He said he is taking his money to a different bank because of the recent closing of SDB’s.

Client wanted to Jaime Dimon to know that he is not happy with this short sighted decision.

He is not happy that no one suggested a CD so he could make more money off his $191,000+.

He also mentioned that he has a new branch to go to but it is a long drive away - downtown Los Angeles. Sent me an email to voice this concern and annoyance at this situation.

A new hospital was just built. The [redacted] area would be great or by the new commercial, and corporate offices going up all the time. I am writing to you this morning about the last and only branch left in Farmingdale, NY on Broadhollow Rd. It’s a shame that you closed the closure of this location.

As they have nothing in place to protect you from FRAUD. They will go after you and take any income, Social Security, Disability, anything to fix the issue.

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**Comment Source**

<table>
<thead>
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<th>Year</th>
<th>Comment Source</th>
<th>Comment Received Date</th>
<th>Comment*</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020</td>
<td>INSTAGRAM</td>
<td>1/6/2023</td>
<td>Hello - I needed cash this morning and your atms on 271 Larkfield road east Northport ny 11731 were not working. I had to go to another store and 1/6/2023 @CapitalOne the same way @Chase closing some ATM locations early due to homeless people occupants/crime, you too need to do something</td>
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**CRA Public File Comments Received via Social Media 2023**

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<td>You can’t deny there’s a wealth gap.” – Eduardo Cabralna</td>
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# [Wealth gap](https://www.levelandk.com/2023/02/07/wealth-gap.html) #EduardoCabralna #CRA #CRA2023 #RacialEquity #CommunityBanking #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING #INCOMEINEQUALITY #BANKING |


2023 INSTAGRAM 2/17/2023 Empowering the Black community through financial literacy and growth! Proud to see our President, Todd McDonald and CEO, Alden McDonald, join forces with Jamie Dimon, President of Chase, for a meaningful discussion on building a brighter future for Black owned banks.
#blackhistorymonth #banking #community #business

2023 INSTAGRAM 2/17/2023 #blackhistorymonth #banking #community #business


2023 INSTAGRAM 2/22/2023 BREAKING GENERATIONAL CURSES ONE ACCOUNT AT A TIME BREAKING BLACK CLOSINGS CONTINUE CHASE BANK WE...
The Mavericks' charter is to advance charity, culture, community, and commerce through the West Valley.

On March 31st, we had the privilege of aligning with Chase Bank and holding a workshop on how to understand and build credit. Maria Behun, the community manager at Chase, made all the women educated on their financial journey. It was a great workshop and it was very beneficial for everyone.

Thank you Chase and Maria Behun for this opportunity.

On May 1st, they'll be here to help you with everything from credit scores to retirement plans and more.

On March 13th, we're requesting these charges be amended, as a person who has low income with bills etc., “a deposit needs to be made by 11PM ET on the business day following the day your account is overdrawn” is NOT feasible. I could say more, but will end on this. Do Better.

On April 19th, we're getting ready for FREE financial advice from our new partners Chase at the Bell Gardens Club.

On April 6th, we're thanking everyone who came out this morning to the Cafecito con Chase for Business workshop.

2️⃣ on May 1st, they'll be here to help you with everything from credit scores to retirement plans and more.

1️⃣ on April 13th, we're thanking everyone who came out this morning to_the Cafecito con Chase for Business workshop.

The Anacostia Arts Center is gearing up for a major transformation backed in part by a new $2 million donation from JPMorgan Chase & Co., according to WACIF (The Washington Area Community Investment Fund Inc.), its nonprofit owner.

The Chase donation unveiled last week marks the largest contribution so far to the $37 million project and the third from a major bank — Bank of America committed $5 million to the project last spring, and Trust Bank pledged about $217,000 to the renovation.

Chase and Bank of America are both participating in a $4.7 billion commitment led by the Greater Washington Partnership to invest in minority-owned businesses, according to the Washington Business Journal.

WACIF has around $4 million left to raise for the arts center campaign.

The project is set to revitalize the 35,000-square-foot Anacostia site on Good Hope Road SE, which already serves as a hub for local arts, food, and health-related small businesses, and includes a lower-level community space, related to the renovation.

The steps WACIF is working with the LEHS Architects on renovation plans that include two additional floors of office space with a rooftop terrace and penthouse for events and gatherings.

WACIF team members say the renderings are on display in the lobby of the arts center so visitors can provide feedback.

Construction could begin by spring of 2024, according to WACIF chief of staff Brendon Miller.
2023 INSTAGRAM 5/17/2023 Thank you so much chase for hosting this well needed table talk about how to grow their homeownership numbers. It was a 14 year professional in the space of real estate and creating wealth for the black community. It’s truly bigger than the commission check. It’s creating the opportunity to allow every one an opportunity of what a true piece of America is.

I was just sharing a story with someone yesterday that I remember when I was 10 years old, I was looking at condos with an FHA loan and obtaining a seller’s credit. White I beat myself up today for not pulling the trigger on this. If I can go back to my 10 year old self. I would pull the trigger 10 times. I wished that same condo got sold for over 120k then watched the community grow to a vale of 250k plus today.

My goal is truly stress the importance of owning a piece a land, a piece of investment and a home.

With that magic wand, all things are possible.

Chase, and all staff members, thank you for inviting narebsouthflorida to the table and thank you for inviting me to the table.

Dallas-Fort Worth, TX-OK CSA

2023 INSTAGRAM 5/17/2023 In everyone’s when I’m not busy cooking, I love to network with fellow entrepreneurs. Recently, I had the pleasure of attending the Chase for Business event in Dallas, Texas during National Small Business Week. It reminded me of the importance of supporting small businesses.

There are many great reasons to support small local businesses this year:

- Small businesses tend to give back more to their communities.
- Small businesses make a significant economic impact.
- Small businesses offer better customer service.
- Small businesses offer a greater variety of products.

This particular event showcased small businesses based in Dallas, and it was evident how much these businesses contributed to the community and offered fantastic products. Chase for Business did an outstanding job organizing the event, and it’s easy to see why they’re the go-to partner for small business owners in my community and beyond.

I had a wonderful time at the event, and I encourage you to check out your local Chase for more exciting events like this. Let’s continue to support small businesses and our local communities.

San Jose-San Francisco-Oakland, CA CSA

2023 INSTAGRAM 5/21/2023 We made chase give up a trillion dollars and Chase bank continues to redefine black communities! When the community steps up to organize, we win! #ReparateChase

2023 TWITTER 5/23/2023 Investing Impact Capital into #MinorityOwneBusiness very literally means making someone’s dream come true. Thank you @JPMorgan & Chase for giving me the chance to talk about my journey to #impactinvesting. jpmorgan.com/commercial-ban... \n@twitter.com/GodIamKy

2023 INSTAGRAM 5/23/2023 This afternoon, Andrea Andreade, with Chase Bank- Community and Business Development, stopped by to provide a Financial Literacy session to our members. The tutorial covered credit establishment, budgeting and savings. We are excited to be able to offer such useful and supportive professional development sessions to our teams. Thank you again Andrea for supporting our corpus! #YouthDevelopmentProgram #FinancialFreedom #BlackBusinesses #YouAreRise #YouAreRise #YouAreRise

2023 INSTAGRAM 5/26/2023 One of our core values is Leading Leaders - Today we receive at College grants Rocky frog VF of Community and Business Development at chase Bank. To talk about Your Financial Journey.

2023 FACEBOOK 5/26/2023 They suck so bad that the review link doesn’t work, they don’t want the truth published as chase bank are greedy selfish scums who discriminate less than White Americans (72.7%)

2023 INSTAGRAM 5/27/2023 Had the pleasure of attending chase bank West Philadelphia Branch to attend their Small Business Masterclasses this month! Their “Window of Opportunity” workshop highlighted how to certify your business, accessing diversity programs in corporate programs and securing funding for your business!

Thank you to those who facilitated this event! I’m thankful for the new connections made here with other small business owners as well! Until next time! 😊

@chasebank #chaseyourdreams #entrepreneurship #fundingforyourbusiness #smallbusiness #community

2023 TWITTER 6/22/2023 Why the hell is every @Chase ATM in downtown Stlouis & impossible to access on a Friday night in June? To keep the homeless out? #Chase 

2023 LINKEDIN 6/17/2023 Truly amazed at what @JPMorgan Chase & Co. / Chase for Business is doing in local communities across America. We are so thankful to participate in each of their local market activations as this rolls out throughout 2023. We hope everyone enjoys their ecosystem """" 100% organic cotton Chase local activationdots at apex! Business #Corporation #Activation

2023 INSTAGRAM 6/17/2023 DIY and our partners at Chase Bank, Builders of Hope CDC and Shiloh Legacy Holdings are giving the A.B.C.s to homeownership in the Black community.

Black Americans lag significantly in homeownership (44%), that number has only increased 0.6% in the last 10 years and is nearly 20 percentage points less than White Americans (72.7%)

Let’s close the gap!

Join DW this Thursday, June 22nd at #wipandwe and hear from panelists who are experts in the real estate industry.

Check the link in the bio and RSVP! for this free event!

2023 INSTAGRAM 6/21/2023 It was an honor to elevate and educate over 80 small businesses that participated in our Start to Scale Business Playbook series! In one month, we were able to educate over 150 BLACK Angelinos about best business practices, business credit, street vending, pitching, and so much more! On June 21st, we joined Chase Bank to award three amazing small businesses with grants to accelerate their businesses to the next level! More educational opportunities coming soon!

Thanks to the CIIE, Chase, and all staff members, thank you for inviting narebsouthflorida to the table and thank you for inviting me to the table.

Los Angeles-Long Beach, CA CSA

2023 INSTAGRAM 7/13/2023 A proposed new office building on Chattanooga’s North Shore is slated to bring Chase bank’s first retail branch to the city along with an AFC Urgent Care location.


People will need these services.”

2023 INSTAGRAM 7/27/2023 JP Morgan Chase, Community Banking has kicked off their Financial Literacy workshops. They will be visiting our seven Summer enrichment sites to teach youth banking as they go back to school. Don’t forget to enroll your child in our summer camp, it’s not to late to join!!! #Youth #Youthprogram #Youth #Youthcorps #Youthprofile #Youth #FinancialReadiness #Youth
As a small business, if your banker is not calling you and asking how to help you grow, then you might want to change that relationship. We are honored to have completed the Chase Minority Mentorship program. Chase @morganchase is committed to helping Minority owned business thrive and we couldn’t be happier to be a part of it!

We are grateful to our mentor and business advisor, Josual Figueroa, for the time and patience with us and for helping us find strategic ways to help our business grow.

Today we had our Graduation ceremony at the Chase Community Branch in Philly. We also were able to catch up with our digitalUndivided Familia! It was a mini Breakthrough Philly reunion. Loved being connected with new founders and seeing everyone. Pa Alante Mi gente!

Thank you to everyone who joined us on Saturday, September 16th, at the Memorial Auditorium for our SOLD OUT 10th annual Hard Hats and High Heels Gala.

Emcees: Kevin John and Shiloh Costello
Exclusive Wine & Bubbles Sponsor: Bogle Family Vineyards
The Setzer Foundation
Future Framer Sponsor: U.S. Bank
Presenting Sponsor: mySMUD
Chair of the Board: Darcy Donahoe-Wilmot, Selina Pichardo, M.A., Laura Mathieu
Cécile Chalifour, Laura Orella, Maxwell Kozl, Don Blakeney, Ken Takahashi, Vicki Foege, Susan Yang, M. Michelle Purnell-Hepburn, Eileen Franz

#onechase #communityrootshousing #affordablehousing #racialequity #communityengagement #communitydevelopment

"Everyone has the right to a quality affordable home" is the north star of Community Roots Housing that drives their work. Today, with nearly 50 apartment buildings and over 2,000 residents, they continue their commitment to build community with and for people. @morganchase @chasecommunitydevelopmentbanking @chase supported and partnered with this meaningful organization, and appreciate all the colleagues, partners, and community leaders who came out to support the event!

foster thriving, just communities. A big thank you to Bob Powers from Chase Community Development Banking division for supporting and partnering with this meaningful organization, and appreciate all the colleagues, partners, and community leaders who came out to support the event!

Thank you to everyone who joined us Saturday, September 10th, at the Memorial Auditorium for our SOLID OUT 10th annual Hard Hats and High Heels Gala.

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My goal is truly the importance of owning a piece a land, a piece of investment and a home.

With that magic wand, all things are possible.

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Happy 10th anniversary to Community Roots Housing! Thank you to everyone who joined us on Saturday, September 10th, at the Memorial Auditorium for our SOLD OUT 10th annual Hard Hats and High Heels Gala.

With a goal of $475,000, we raised $497,795 to build and repair homes for low-income families, seniors, and veterans in our region!!!

A huge thank you to the Sacramento Memorial Auditorium for hosting, as well as our generous sponsors and partners:

Presenting Sponsor: mySMUD
Future Framers Sponsor: U.S. Bank
Real Estate Sponsor: UPS Architecture + Design, River City Bank, InterWest Insurance Services, HealthNet, Amazon, Broadway Vet Hospital, Venetian Pet Hospital, Goodfellow Bros., United Surgical Partners, Central Valley Community Bank, Umpqua Bank, Susan Sheridan and Effrnia Ford, The Setzer Foundation
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A huge thank you to the Sacramento Memorial Auditorium for hosting, as well as our generous sponsors and partners:

Presenting Sponsor: mySMUD
Future Framers Sponsor: U.S. Bank
Real Estate Sponsor: UPS Architecture + Design, River City Bank, InterWest Insurance Services, HealthNet, Amazon, Broadway Vet Hospital, Venetian Pet Hospital, Goodfellow Bros., United Surgical Partners, Central Valley Community Bank, Umpqua Bank, Susan Sheridan and Effrnia Ford, The Setzer Foundation
Exclusive Wine & Bubbles Sponsor: Bagle Family Vineyards
Dancers: Kevin John and Shiloh Costello

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Students learned lots of great information about credit scores, debt, and healthy spending practices.

Thomas Callahan, the executive director of the Partnership for Financial Equity, said that while the number of branches across the state is dwindling as digital banking rises, some banks are making intentional choices about placing their physical branches in communities of color.

For example, earlier this year, Reading Cooperative Bank opened its first full branch in Lawrence. In 2020, Lawrence has a population of about 80,000 people and 83.1% of the people in the city identified as Hispanic, according to Census records. Chase opened a branch in Mattapan in late 2021, which also serves as a community space for the area.

"We’re seeing some very strategic branch openings going into communities of color. That is a really good sign, given the importance branches play in low-income communities and communities of color," Callahan said.

I will now include Banks, that charge poor middle-class 30+ interest, to in Slave, Steal all future income. @WellsFargo @Chase @eCiti @Goldman @BankAmerica @JPMorgan @FBN

@TheMichaelJorg @FullCircle310 @GormanUSA you twitter.com/albums?mbUrl

@AHFMag recognizes Jessel Amin, Andrea Bell, Nick Cangelosi, Lindsey Haines, and Zach Johnson as this year’s Young Leaders in affordable housing.

@Chase @OregonHCS @TheMichaelsOrg @FullCircle310 @GormanUSA pic.twitter.com/w8g7mBb53g

#CDFIs play a critical role in underserved communities. A new report from @JPMorgan @Chase details the ways #CDFIs create economic opportunity, #AffordableHousing and essential community service through combining #Capital with technical assistance. jpmorgan.com/insights/real-

EMPOWERING OUR KIDS WITH FINANCIAL EDUCATION.

Eduardo Cabrera, Community Manager at chase Bank, talks about the importance in talking to our kids about money EARLY.

*Note: Special characters and emojis may be edited to improve accessibility*
**Customer Comments Received via Regulatory Agency Website**

**Comment: Chicago, IL Written Comments**  
**Date Submitted: 1/7/2024**  
**Submitted Via: CFPB Online Customer Complaint Form**

**Customer Comments**

In October 2023, I contacted Chase credit card services by phone to request an interest rate reduction. The interest rate for this card is double the other interest rate that I have for another mainstream credit card. I was told that Chase reviews these automatically and that she was unable to submit my request for an individual review. I found this at odds with what most companies do. In fact, as a consumer you are encouraged to contact your credit card company and request a lower rate. I tried to find a contact online to submit a complaint under Community Reinvestment grounds, but was unable to find one. Then I emailed the bank. The response I got from the bank on Oct 7 2023 is as follows: "Thank you for contacting us from your XXXX account ending in XXX. For privacy reasons, we generally don't discuss our business interactions with individuals or businesses. XXX, we appreciate you being a Chase customer."

My complaint will be resolved when the bank commits to reviewing my card for an interest rate reduction. I would also like the contact information to submit a complaint under CRA grounds. Offering an interest rate like this is not meeting community credit needs.

*Note: Comments are verbatim from the submission to the online regulatory form; personal or sensitive information has been redacted.*
January 16, 2024

[REDACTED CONTENT]
[REDACTED CONTENT]
Chicago, IL 60625

Your current annual percentage rate (APR) is the lowest available at this time

Reference Number: [REDACTED CONTENT]

Dear [REDACTED CONTENT]:

We are responding to your inquiry about lower interest rate for your credit card account ending in [REDACTED CONTENT]. We appreciate the opportunity to assist you.

Upon review, our records confirmed there were no records found within the last three months of you requesting an interest rate reduction. Your current annual percentage rate (APR) for purchases is 28.74% Variable. We review eligible accounts regularly to determine if the customer qualifies for a lower APR.

At this time, we processed a lower APR inquiry on your behalf. We confirmed that your current APR is the lowest available at this time. You can always check your monthly billing statement or sign in to chase.com to view your APRs. The cardmember agreement fully explains your account terms. We enclosed a copy for your records.

We deny all allegations of not meeting community credit needs and Community Reinvestment Act (CRA) violations. We are not able to provide contact information for CRA. We apologize for any inconvenience this may have caused. We look forward to a continued banking relationship with you.

If you have questions about this issue, please call [REDACTED CONTENT] at 1-877-805-8049, extension [REDACTED CONTENT]. If you have other questions, please call us at the number below. We accept operator relay calls. We’re available Monday through Friday from 8 a.m. to 9 p.m. and Saturday from 9 a.m. to 6 p.m. Eastern Time.

Sincerely,

Card Executive Office
1-877-805-8049
1-847-787-5509 Fax; it’s free from any Chase branch
executive.office@chase.com
chase.com
February 20, 2024

[Redacted] West Region Executive, Community Engagements
[Redacted] CA Director, Community Engagement
[Redacted] Head of Community Reinvestment & Community Partnerships
[Redacted] Head, National Stakeholder & Policy Engagement

JPMorgan Chase Bank

Sent Via Email

Re: 40 California organizations comment on JPMorgan Chase Bank’s CRA performance and identify community credit needs and opportunities: Follow up to November 1, 2023 meeting.

Dear [Redacted] and [Redacted]

On behalf of Rise Economy (formerly the California Reinvestment Coalition), we want to thank you very much for meeting with our coalition members on November 1, 2023. We appreciated that a number of JPMorgan Chase Bank (“Chase” or “Bank”) staff members met with us in person in Los Angeles, that other key Bank staff participated virtually (as did Rise Economy members who could not get to Los Angeles), and that most everyone stayed the full three hours scheduled for the meeting, plus a few additional minutes so that everyone could be heard. This letter is intended to capture the comments, questions and requests made at the meeting.

Rise Economy is building a powerful movement for economic justice, focused on knocking down the historical barriers for Black, Latine/x, and other People of Color who have faced hardships building generational wealth. We’re focused on creating a more equitable society where BIPOC have access to resources and opportunities to build generational wealth. We accomplish this by driving empowerment, advocacy and action, and growing collaboration.

Our members have been eager to meet with Chase. This reflects the deep impact that the Bank has, and can have, on BIPOC communities in our state. And as [Redacted] noted, it has been a few years since we last met in person. Our interest in meeting was of course heightened by the Bank’s acquisition of First Republic Bank (“FRB”) in May, in a transaction that was not subject to public comment and following which Chase did not appear to make any additional commitments to better serve California communities.

We were pleased to bring to the discussion forty (40) California-based community organizations who were able to help the Bank identify community credit needs and opportunities and who were able to comment on various aspects of the Bank’s performance.
As such, we view this meeting as an important opportunity for the Bank to learn how it might enhance its CRA related performance in California, and we believe this dialogue should inform the Bank’s plans and CRA examinations. As such, we request that this letter be placed in the Bank’s CRA Public File. We similarly have been meeting with the Bank’s peers and providing comments on their CRA-related opportunities and performance.

In general. While JPMorgan Chase is engaging in many positive activities in California, we are concerned that Chase is not transparent about the level and extent of its reinvestment activity in the state. We note that Chase did respond to the joint data request from Rise Economy (then California Reinvestment Coalition) and the Greenlining Institute in 2022, but has not responded to our 2023 data request relating to Bank performance in 2022. While the Bank indicated it would try to provide us data before the meeting, and in fact suggested we push the meeting back to make this more likely, additional data was not provided. We find the lack of data on Chase performance particularly concerning in light of the Bank’s acquisition of First Republic Bank, one of the largest California banks.

FRB Acquisition. More specifically, when the FRB acquisition was announced, we asked JPMorgan Chase to keep all FRB branches in California open; to fund all investments, grants and projects in the FRB pipeline; and to make a transparent commitment to California communities. What we saw instead was Chase announcing it would close 21 branches in our state. In our conversations and in our meeting, you indicated that Chase was working to fund some of the projects and grants in the FRB pipeline. We are encouraged to hear that and look forward to learning more.

Yet Chase’s acquisition of FRB stands in stark contrast to the First Citizens Bank (“FCB”) acquisition of Silicon Valley Bank (“SVB”). FRB And SVB were similarly sized (approximately $200 Billion in assets in 2022), focused on serving wealthy customers, state chartered, and engaged in significant community development efforts in our state. Both banks began to fail, and were acquired by larger institutions in emergency transactions not subject to public comment or the customary merger review process. That is where the similarities end.

While Silicon Valley Bank had a Community Benefits Agreement with Rise Economy, First Republic did not. FRB did however make discreet commitments, including an important commitment not to finance new fossil fuel expansion projects, and made certain anti-displacement financing commitments, in part, due to Rise Economy advocacy. We do not believe that Chase has chosen to honor any of these FRB commitments.
First Citizens Bank for its part negotiated in good faith a $6.5 Billion addendum to its existing $8 Billion CBA commitment to California communities, agreed not to close California branches, agreed to fund SVB projects and grants in the pipeline, and agreed to retain SVB branch and community development staff. We appreciate that FCB has been transparent about its CRA activity in California, what its expected CRA activity will be in California, and how these efforts will be enhanced to account for the loss of SVB CRA activity. We do not see the same transparency or commitments with Chase and its FRB acquisition.

We reiterate our request that Chase provide a baseline for CRA activity in California by First Republic Bank and JPMorgan Chase in 2022 and 2021, and a commitment to exceed that baseline for reinvestment activity in the state in 2024, with annual increases in activity going forward. We are concerned that otherwise, Chase could engage in LESS reinvestment activity in 2024 than the performance of both banks in 2022 and years prior. To the extent that Chase fully intends to enhance its reinvestment activities in California, transparency and a forward-looking commitment can only help to substantially allay community concerns.

According to the American Banker, “JPMorgan Chase closed out the most profitable year in U.S. banking history with its seventh consecutive quarter of record net interest income and a surprise forecast that the windfall may continue this year.” We wonder if this will be a good year for JPMorgan Chase’s reinvestment activities in California, or just for JPMorgan Chase shareholders.

Branches. According to our data analysis, since COVID and up until the time of our meeting, Chase closed 164 branches in California. Most of those branches were located in BIPOC neighborhoods. How does this reconcile with the Bank’s racial equity commitments? As Rise Economy member organizations note, local branches can be a lifeline for small businesses, economic development and philanthropy in communities and are generally well trafficked when located in LMI neighborhoods of color. Further, our analysis suggests that during the same time period (2000 through 2023), Chase opened approximately 40 new branches in our state (for a net LOSS of bank branches in our state of 124), but only 25% of these new branches were in LMI communities. Earlier this month, Chase announced that it would be opening 500 new branches across its footprint, but it is unclear whether this will result in a net increase or net decrease in Chase branches in LMI, rural and BIPOC neighborhoods.

We ask the Bank to commit to not close any additional branches in low or moderate-income communities, rural communities, or communities of color in California, unless it is willing to site a new branch in a neighborhood with similar characteristics in our state. We ask the Bank to open new branches in LMI, rural and BIPOC neighborhoods in the state to the extent of all FRB branch closures in those neighborhoods.
Foreclosure Prevention. Rise Economy members expressed concern about increasing foreclosures in California and about particular JPMorgan Chase practices and policies. Housing counselors and legal service lawyers are seeing more cases industry-wide involving “zombie” second mortgages, tangled titles, challenging loan modifications, and successors in interest (“widows and orphans”), and expressed particular difficulty in trying to access the state homeowners assistance fund, CalMRP, on behalf of Chase borrowers.

We ask that the Bank commit to halt all foreclosure proceedings upon receipt of a CMRP application, if it has not done so already, and to develop a meaningful escalation process if advocates and homeowners are hitting barriers with Chase Single Points of Contacts (SPOCs).

Homeownership. Rise Economy members recommended areas for improvement in Chase’s mortgage lending practices and support for homeownership. By way of comparison, Rise Economy members noted that First Republic Bank had offered some of the lowest interest rates on its mortgages, which enabled more low-income borrowers to get mortgages and become homeowners. Additionally, Chase’s down payment assistance programs are insufficient, offering homebuyers in California’s high cost markets only $5,000. Members noted that the Bank’s peers are much more generous and make their programs more attractive to borrowers. We have since read that Chase may be increasing this amount to $7,500, which would be an improvement, but still less than would be impactful in our state.

Rise Economy members asked if it is true that the Bank offers shared loans to homebuyers in other states, yet does not do so in California. Limited equity and related alternative models of homeownership are becoming more mainstream and offer a viable path to homeownership in expensive states such as ours. Relatedly, there is a need for capital for Community Land Trusts and similar nonprofit entities that seek to acquire and preserve existing housing to keep that housing affordable and to prevent displacement. These products need to be flexible and allow for the quick disbursement of funds so that mission-driven nonprofit organizations can take housing off of the speculative market. We understand Chase has committed funds for housing preservation and that those funds are being distributed in California and other states, which we appreciate and wish to understand better.

There is also a need for construction loans, home improvement loans, and loans to support Accessory Dwelling Units (ADUs). We understand that there may be a gap in the Bank’s product offerings in these areas. Rise Economy members also suggested that Chase consider social impact bonds as a creative way to support affordable homeownership opportunities.

Additionally, the Bank’s 2022 mortgage lending data suggests potential redlining risks in the following communities in California:

- Applications in Majority Asian neighborhoods
• Originations in Majority Asian neighborhoods
• Withdrawn applications in Majority Asian neighborhoods
• Withdrawn applications in Majority Minority neighborhoods
• Incomplete applications in Majority Hispanic neighborhoods
• Incomplete applications in Majority Black/Hispanic neighborhoods
• Approvals in Majority Hispanic neighborhoods
• Approvals in Majority Asian neighborhoods
• Approvals in Majority-Minority neighborhoods
• Approvals in Majority Black/Hispanic neighborhoods
• Denials in Black neighborhoods
• Denials in Hispanic neighborhoods
• Denials in Majority-Minority neighborhoods
• Denials in Majority Black/Hispanic neighborhoods
• Collateral Denials in Hispanic neighborhoods
• Collateral Denials in Majority-Minority neighborhoods
• Collateral Denials in Majority Black/Hispanic neighborhoods
• Subprime Spread in Black neighborhoods
• Subprime Spread in Hispanic neighborhoods
• Subprime Spread in Majority-Minority neighborhoods
• Subprime Spread in Majority Black/Hispanic neighborhoods

We ask the Bank to increase the level of down payment available via the downpayment assistance program, and to work to connect this assistance to other existing local and state homebuyer assistance programs in California. The Bank should also offer shared loans in California and commit significant resources to support community land trusts and limited equity models of homeownership and to help these entities acquire and preserve housing that is, and can remain, affordable.

We also urge the Bank to set a goal to double the percentage of its mortgage lending to African American, Latine, Asian American, and Native American borrowers, and to develop a concrete plan to achieve this increase through the use of hiring and diverse employment goals, placing more loan officers in BIPOC communities, opening new branch locations in BIPOC areas, robust marketing and outreach, deliberate and enhanced use of ethnic media, partnerships with key affinity groups, product design, and other measures.

**Special Purpose Credit Program.** One of the most powerful ways to address lending disparities and the racial wealth gap is through the adoption of a Special Purpose Credit Program. We applaud the Bank for agreeing to do so and for beginning to implement this program. And yet, we believe the Bank can achieve greater success if it modifies the program to become a borrower-based, as opposed to a neighborhood-based, program. Rise Economy members have
had several conversations with several financial institutions regarding several SPCP designs, and our overriding feeling is that, however well intentioned, neighborhood-based SPCPs will inevitably foster gentrification (as borrowers of various incomes and demographics that are not underserved are allowed to apply for the SPCP) and segregation (as residents of neighborhoods of color may not able to take advantage of the neighborhood-based SPCP to move to a neighborhood of their choice, which could be a neighborhood that does not qualify under the program). This is not a theoretical discussion, and we are concerned that, in this way, neighborhood based SPCPs may run afoul of fair housing and fair lending principles.

In fact, we understand that while Chase may be reaching African American, Latine and Asian American Pacific Islander households with its SPCP homeownership product, perhaps over one-quarter of all beneficiaries of the SPCP are white borrowers who are using the SPCP to purchase homes in neighborhoods of color, which may be producing gentrification as an unintended consequence. Again, we applaud Chase for developing a SPCP mortgage (and small business) product, but we urge you to reconsider the design of the program to better serve the fair lending goals of the company and the Equal Credit Opportunity Act.

We also note that Chase appears to be far off its goal of establishing an incremental 40,000 new home loans for BIPOC borrowers at $8 Billion, and appears to be struggling to reach its initial baseline, having funded only $765 Million. At the same time, we commend Chase for making a Racial Equity Commitment (“REC”), and for its transparency regarding its performance in striving to meet the goals set forth in the REC. We urge the bank to embrace a similar level of transparency for all of its community activities.

We ask the Bank to revise its mortgage SPCP to specifically target African American borrowers and other underserved BIPOC borrowers, to explore ways to make the program more affordable for more borrowers, to work with local housing counseling agencies, to provide community organizations with HMDA-like data regarding which borrowers are being served by the SPCP, and to commit to dedicate additional resources to the SPCP in California so that it can better serve and reach more borrowers in all areas of California.

Affordable housing. Indisputably, California continues to face a critical shortage of affordable housing and this represents a primary community credit need for CRA purposes. To its credit, JPMorgan Chase included in its REC a goal to support the creation and preservation of government subsidized affordable housing.

Unfortunately, Chase appears to be lagging on its subsidized affordable housing goal, having completed approximately 20% of the goal during 40% of the REC’s 5 year term. Specifically, Chase committed to 22,000 additional preserved government subsidized affordable units, yet only completed 4,350 in two years. Further the Bank committed to $1 Billion of loans and 7,000
affordable rental units through development of Agency and Off-Balance Sheet Lending through government-sponsored enterprise partnerships, yet only report $155 Million and 1464 units through 2022.

During our meeting, a Rise Economy member noted that Community Land Trusts are well positioned to purchase distressed properties, preserve tenancies, create homeownership opportunities for LMI households, mitigate risk for the bank, and serve ITIN borrowers. By way of comparison, First Citizens Bank committed $25 million to help CLTs and other housing nonprofits to purchase distressed properties in furtherance of developing state policy designed to mitigate the negative impact of investor real estate purchases on household stability and homeownership. FCB then agreed to fund an additional $11 million in such investments to honor commitments made by SVB when it acquired the bank.

A Rise Economy member discussed the community credit needs of building the capacity of affordable housing developers of color. As one example of what another institution is doing in response to the identification of this need, U.S. Bank committed to develop a SPCP for affordable housing developers of color, is implementing this program, and is reaching smaller and BIPOC led developers. During the meeting, Chase indicated it has been supporting developers of color in a variety of ways.

An ongoing concern of ours is that many banks are financing landlords that are evicting, harassing, or displacing tenants, or not maintaining properties in a habitable fashion, inconsistent with our Anti-Displacement Code of Conduct. As noted above, even First Republic Bank made commitments to address this concern.

We ask the Bank to commit to:

- A greater percentage of its deals to be with smaller and BIPOC led developers and to do so by developing a SPCP for developers of color, by connecting with on the ground groups such as the Black Developers Forum, by looking to finance small site and landfill projects that may be more conducive to emerging developers, and by working to make it easier to access the Enterprise developers of color fund, amongst other approaches.
- Agree to meet with CLTs to determine whether it can offer and/or develop products that will work for CLTs.
- Invest $60 Million to help CLTs and other nonprofits purchase distressed properties instead of investors, consistent with California policy.
- Review its commercial real estate lending policies so that they align with our Anti-Displacement Code of Conduct.

CDFIs. We note that Chase achieved high marks for its support of CDFIs in a CCEDA and Rise Economy survey of CDFIs and CDCs, and those efforts are appreciated. During the meeting, Rise
Economy members, however, expressed concern that Chase is not partnering with smaller CDFIs that are more likely to be led by people of color. Members noted that smaller and emerging CDFIs aren't able to access the same opportunities as bigger and more established ones. Emerging CDFIs are often overlooked and left behind, resulting in small CDFIs being unable to rise to the next level to qualify for more funding from bigger banks. We also noted that Chase was behind its REC goal for New Markets Tax Credit investments, though the bank reported it is taking action to address this deficiency.

*We ask the Bank to increase local support of and engagement with CDFIs, and to track and to dedicate funding to smaller and BIPOC-led CDFIs in California.*

**Supplier Diversity.** A Rise Economy member asked whether Chase has a goal for its supplier diversity efforts in California and if this goal includes a subgoal for the Asian American Pacific Islander community, in addition to other groups. This question was not answered.

*Can you provide data for the Bank’s supplier diversity performance in California for 2022 and 2023 for all race, ethnic, and gender groups, and the Bank’s goals for supplier diversity in 2024?*

**Small Business Banking.** Rise Economy members noted that Chase appears far behind its small business lending goals from the REC, not even hitting its baseline performance. We appreciate the Bank’s efforts to develop a small business special purpose credit program, to lower lending limits and offer smaller sized loans, and to mentor small businesses. While we appreciate that COVID has impacted big banks as well as small businesses, Rise Economy members also noted that the Bank’s small business goals were developed during COVID. Rise Economy members asked how they can help Chase meet its small business lending goals.

*We ask the Bank to commit to:*

- *Specific marketing dollars to support ethnic media in California, to increase annually over a five-year period.*
- *Creating a commercial down payment assistance program via a Special Purpose Credit Program to help BIPOC small business owners purchase their buildings, build wealth and avoid displacement.*
- *Specific dollar commitments in support of small business technical assistance in California, to increase annually over a five-year period.*
- *Sharing data on the percentage of CRA small business loans in California which are credit card loans, versus term and other types of credit products, including the neighborhood demographics for loans originated through each lending channel.*
Philanthropy. The REC commits Chase to contribute $2B to underserved communities, though actual performance appears to be lagging.

Rise Economy members noted that Chase may do a good job with philanthropy to large nonprofits, but does less well in supporting smaller organizations. For example, the Bank has developed and deployed its own financial literacy program instead of supporting local nonprofits that have the necessary cultural competency, community relationships, and language access to properly serve the community (and in many cases, are already doing this work). The Bank should view capacity building of small nonprofits tied to the community as a good investment.

There is also a need to support faith based organizations, especially those exploring whether they can take advantage of a new state law making it easier to build affordable housing on Church-owned properties.

As with many areas of the Bank’s performance, we are unsure about the Bank’s overall philanthropy efforts in our state. In contrast, U.S. Bank has made a transparent commitment to Rise Economy that it will donate $40 million/year in CA over the next 5 years. At the same time, we believe that Chase is roughly 3x the size of U.S. Bank in California. We believe that in order to keep pace with U.S. Bank while accounting for its much bigger size, Chase would need to commit approximately $120 million/year in philanthropy in our state.

We ask the Bank to commit to increase grants in California substantially each year for the next 5 years so that it is at least in line with U.S. Bank’s commitment, accounting for size.

Consumer accounts and customer service. As noted above, Chase does offer its own financial literacy program. However, there is concern that the Bank may be using financial literacy as a marketing tool to promote its own products. In contrast, nonprofit organizations that teach financial literacy aim to empower clients with information, enabling them to make informed financial decisions. Nonprofits do not steer clients towards a particular banking institution but provide them with knowledge so they can choose a bank that best suits their financial needs. The goal of nonprofit financial literacy programs is to ensure that clients can make fair and well-informed financial choices, enhancing their financial well-being.

One Rise Economy service provider member expressed concern that their clients were receiving poor treatment at Chase branches when they tried to open accounts. The Director, a Chase customer for over a decade, also indicated that when they reached out to Chase to discuss the matter, no return call was made.
Further concern was expressed by Rise Economy membership that Chase contracts with collection agencies to recover debts, often without properly notifying the client. Lack of proper communication leaves clients unaware that they are being sued, resulting in significant harm to low to moderate-income (LMI) communities. These collection efforts are reported to sometimes extend to the point of contacting clients’ employers to garnish their wages, putting clients at risk of losing their jobs. Additionally, it was asserted that bank accounts are being levied, causing further financial strain. It’s important to recognize that when a client is unable to pay their credit card bill, it’s typically due to financial hardship. Rather than working directly with clients to find mutually beneficial solutions for debt recovery, we are concerned that Chase’s approach can lead to dire consequences, potentially pushing individuals toward homelessness.

For its part, the Bank expressed that Chase community managers are from the community, speak the languages of the community, don’t sell products as a default, and are measured by participant experiences, which all sound very positive. We are not sure how to reconcile these vastly different perspectives.

Additionally, as many banks move to reduce or eliminate pernicious overdraft fees, Chase retains its place in the top two of institutions, charging $1.2 Billion in fees in 2022, according to CFPB analysis. Through the fourth quarter of 2023, Chase has collected $1.104 Billion in overdraft related surcharges, according to its Call Report. Chase appears to charge overdraft fees of $34 per overdraft (if the account is overdrawn by $50 or more) and permits its customers to overdraw and be charged up to 3x a day, for a total of $104/day.

*We ask the Bank to eliminate OD fees altogether. If it refuses to do so, we urge the Bank to at a minimum, reduce its OD fees to $10 per day and only allow 1 OD per day.*

**Rural and Native American communities.** As has been the case for many years, organizations serving the San Joaquin Valley and other rural areas within the state feel neglected by Big Banks. To the extent the bank has special products, or Special Purpose Credit Programs, these need to be made meaningfully available in rural communities as well as in the cities. Rise Economy members from the Central Valley and serving the Native American community indicated they did not experience any Chase Community Centers in their area. When staffed with culturally competent community managers, these locations can provide critical access to Native American rural communities. We need targeted outreach and support for Native American communities. Chase can work through Tribes to most effectively serve Native Americans. Finally, there is a lack of investments and lending in rural California, particularly the Central Valley.
We request that Chase make specific commitments to tribes in California, commit resources to Native and tribal outreach, and commit to develop a plan to serve Native American, tribal and indigenous communities in California. We further ask the Bank to report on the total amount of CRA activity in each of the thirteen counties of the San Joaquin Valley, and to compare the percentage of California reinvestment in each county to each county’s percentage of Chase deposits in the state. We also ask that all special products that are currently restricted geographically be made available and advertised in the Valley and other rural parts of the state.

Climate Change and Environmental Justice. Rise Economy members have become increasingly concerned about the disproportionate impacts on BIPOC communities of climate change. Banks primarily connect to this issue through the financing of fossil fuels. And in this regard, Chase is arguably the most problematic banking organization in the world. According to the Banking on Climate Chaos report, the Bank is the worst offender in the world, investing and lending a devastating $434.15 Billion in fossil fuel financing since the Paris agreement, with $39.2 Billion in financing in 2022 alone.

Additionally, Rise Economy research, in partnership with Rainforest Action Network (RAN), has also identified billions of dollars in underwriting to companies operating facilities in California. Further, Rise Economy research of Payment Protection Program SBA data found that Chase originated nearly 800 PPP loans to Mining, Oil and Gas Extraction Companies, collecting an estimated $4 Million in fees for doing so. And we are concerned that we are only scratching the surface in our understanding of how Chase is financing climate change. As one example, our allies at Public Citizen discovered that a Chase controlled company was the source of a recent, huge oil spill in the Gulf of Mexico.

Unfortunately, we did not have time for a full discussion of the issues, including an opportunity for Chase to respond, during the meeting. Rise Economy members testified compellingly to the health impacts of having bank-financed refineries in the middle of residential neighborhoods, and the connections between bank financing, environmental racism, and housing instability.

Further, Rise Economy was alarmed to see the bank's new energy mix target in your November Climate report last year. Our concern is that by mixing these metrics it makes it harder to understand the level of fossil fuel investment the bank will be engaged in. We recognize and see value in some ability to account for financing of the energy transition, but we don't think this is the right way to do it.

Finally, we are disappointed to see that JPMorgan Asset Management is departing from the Climate Action 100+ initiative, which comprises hundreds of institutional investors with tens of trillions of dollars under management that have committed to engage with major corporate polluters on climate disclosures and actions. The departure, along with that of State Street
Global Advisors and a pullback from Blackrock, weakens “the climate group’s plan to use shareholder influence to step up pressure on polluting companies to decarbonise, because they mean that none of the world’s five largest asset managers are fully behind the effort.” For its part, Chase “said it had made a ‘significant investment’ in its own stewardship team and corporate engagement: ‘Given these strengths and the evolution of its own stewardship capabilities, JPMAM has determined that it will no longer participate in Climate Action 100+ engagements.’” Yet, some see this move by Chase as caving to anti-ESG political pressures. We will be watching to see if all JPMorgan Chase entities are helping or hurting efforts to mitigate the advance and the impacts of climate change.

We ask the Bank to:

- Refrain from any new financing of fossil fuel extraction activities, either through corporate or project-based finance. This is critical to the survival of the LMI communities of color the Bank is meant to serve. First Republic Bank, which Chase acquired, made a similar commitment.
- Share its policies designed to ensure that California communities of color are not blue-lined and denied bank products or offered bank products at a higher price due to perceptions about the climate related risk associated with our communities.
- Commit significant and specific investment dollars in climate and weather resiliency efforts in BIPOC communities in California. The Bank should develop and disclose a funding goal for this for 2024, with increases in ensuing years.

Lobbying and Litigation. The Bank’s Environmental, Social, Governance Report and its Racial Equity Commitment are replete with statements regarding how the Bank will use its considerable influence to impact policy decisions that in turn will impact LMI and BIPOC communities. Examples include:

- “We execute on and enhance our six-pillar Community and Affordable Lending strategy … participating in policy reform to drive more inclusive growth.”
- “Our commitment to closing the racial wealth gap will remain, no matter what headwinds and economic uncertainties we face.”
- “We are advancing policy reforms that promote access to capital and advisory assistance for underserved entrepreneurs.”
- “We are committed to considering diverse perspectives, particularly those of the communities we serve, in the Firm’s decisions.”
- “We are committed to independent decision-making at the Firm and providing appropriate feedback on the efforts by these associations, including where there is misalignment between the Firm’s ESG objectives and trade associations positions or activities.”
- “The firm continues to support and advocate for the goals of section 1071 of the Dodd-Frank Act, which will mandate collection of data on small business loan applicants,”
including the race of the principal business owners. However, the rule implementing section 1071 is not yet finalized or in effect....The firm is committed to doing its part to help close the racial wealth gap and drive inclusive growth”

Yet we are concerned that we have seen Chase show up on the wrong side of important policy and legal initiatives that have a profound impact on LMI and BIPOC communities, including the debate on section 1071 of the Dodd Frank Act, which the Bank suggests it strongly supports. We have reiterated our dismay that the Bank, through its trade associations, opposed the Consumer Financial Protection Bureau (CFPB)’s efforts to fight non-credit discrimination through its supervision authority. The American Bankers Association (ABA), Consumer Bankers Association (CBA), and Chamber of Commerce went so far as to argue that the CFPB is unconstitutional, an argument that was made by the payday lenders and that went all the way to the United States Supreme Court, and which threatens to undermine many of the consumer protections our coalition has fought to secure. We note that Chase appears to be represented on both the ABA and CBA Boards of Directors.

We were further dismayed to see the ABA join the lawsuit challenging the final section 1071 small business data collection rule, which Rise Economy members have long sought and fought to establish. The ABA apparently also lobbied in favor of the Congressional Review Act Resolution through which the industry and certain members of Congress sought to overturn the Section 1071 rule. We do not understand how the Bank can make statements in response to the murder of George Floyd and in support of racial justice and closing the racial wealth gap, and tout its interest and ability to influence policies for the good of communities, all the while being a prominent stakeholder in efforts to oppose the Section 1071 Rule.

We also know that Chase lobbying has been counterproductive to policies designed to slow climate change. According to CERES, in the last three years, Chase has not met expectations for advocating for Paris aligned climate policies as part of a coalition of companies, and has not met expectations to refrain from opposition to Paris aligned climate policies. And according to Influence Map, Chase has a Sustainable Finance (Paris aligned policies) score of “D”; and a Climate Results (disclosures, ESG, etc.) score of “C-”. Additionally, we note that our allies at the Interfaith Center for Corporate Responsibility and other shareholder organizations have expressed concern with Chase and a few of its peers regarding declining support for climate and ESG related proposals. And of great concern to Rise Economy and our members, we see that JPMorgan Chase is represented on the board of directors of the California Chamber of Commerce, which recently filed a legal challenge against two “nation-leading climate disclosure laws.”
Last but not least, the ABA has filed a legal challenge to the new Community Reinvestment Act (CRA) final rule, which, while not perfect from our perspective, would likely promote an increase in investment in underserved communities.

JPMorgan Chase sits not only on the board of the ABA, but is the only bank to have a seat on the board of directors of a Plaintiff in all of the recent industry challenges of great concern to Rise Economy and our membership noted above. While Chase talks about using its influence to further policies to support communities, its actions at best show it to fail to exercise its influence to prevent profound challenges to landmark and impactful policy matters that would significantly benefit BIPOC communities and our planet.

We ask CEO Jamie Dimon and JPMorgan Chase to respond to our letter dated September 8, 2023 on these issues, to strongly, affirmatively, and publicly support the Section 1071 and the CRA Rules, and to use its influence so that banking trade groups of which it is a member refrain from lobbying against consumer protections and measures designed to reverse the causes and impacts of climate change on our communities.

The First Republic Bank Acquisition. We asked how Chase is honoring First Republic Bank funding relationships and pipeline projects, whether it was keeping FRB staff, and whether it was continuing FRB commitments (including commitments to address displacement financing concerns and to refrain from financing fossil fuel companies and projects). We had raised these issues via a public statement when the acquisition was announced and in ensuing conversations with Chase staff. Yet, Rise Economy members noted that the first thing Chase did after the acquisition was to move to close 21 branches in our state.

We believe FRB engaged in at least $4-$5 Billion in CRA activity in CA per year. Does Chase believe there is a different baseline? If not, is Chase planning to invest an additional $4-$5B in CRA in California per year to make up for the loss of FRB? Will Chase disclose the CRA baselines for FRB and Chase in California in 2021 and 2022, and indicate what its goals are for 2024 through 2028? Will Chase negotiate a CBA with Rise Economy and our members?

Follow-up Meetings. Lastly, throughout the meeting in November, there were several issues that were flagged by Chase bank staff as opportunities for further discussion with Rise Economy members. In an effort to balance the capacities of our respective organizations, we suggested moving forward with one follow-up meeting, early in 2024, on the issue of housing (affordable housing development, preservation, BIPOC homeownership, and foreclosure prevention).

We thank you for agreeing to this arrangement and look forward to a productive meeting.
and thank you and your colleagues again for agreeing to meet, for being engaged during a long meeting, and for your willingness to respond to each of the requests made in this letter. We ask that you respond by March 15, 2024.

We appreciate your interest in helping to meet the needs of California communities. We believe that our communities deserve transparency relating to bank performance and goals in meeting these needs. Please let us know if you agree.

If you have any questions about this letter or want to discuss follow up items emanating from the meeting and this letter, please feel free to contact us @rise-economy.org or @rise-economy.org.

On behalf of Rise Economy, our member organizations, and the communities we represent, we thank you for your efforts.

Very Truly Yours,

Chief of Legal and Strategy

Southern California Organizer

cc: Acting Comptroller Michael Hsu
    Federal Reserve Board of Governors Vice Chair Michael Barr
March 8, 2024

Via Electronic Mail

[REDACTED CONTENT], Chief of Legal and Strategy
[REDACTED CONTENT], Southern California Organizer
Rise Economy
[REDACTED CONTENT]
Oakland, CA 94612

RE: 40 California Organizations Comment on JPMorgan Chase Bank’s CRA Performance and Identify Community Credit Needs and Opportunities: Follow up to November 1, 2023 Meeting

Dear Messrs. [REDACTED CONTENT] and [REDACTED CONTENT],

This letter responds to the Rise Economy (Rise) letter to [REDACTED CONTENT], [REDACTED CONTENT], [REDACTED CONTENT] and [REDACTED CONTENT] of JPMorgan Chase Bank, NA (JPMCB) dated February 20, 2024. Thank you for following up on our in-person meeting last November, which we found both productive and insightful.

Rise makes several observations and seeks commitments from JPMCB in connection with our purchase of First Republic Bank’s (FRB) assets. As we discussed in our meeting, many of the important topics and issues discussed in Rise’s letter are addressed at the Firm level which ensures coordination and prioritization. The Firm will also adopt initiatives, such as the Racial Equity Commitment (discussed in more detail later), that articulate the purpose and goals similar to a Commitment Benefits Agreement with timeframes, milestones and controls to measure progress and achievements. We appreciate the opportunity to address these matters and share our comprehensive strategies in California which are aimed at enhancing financial inclusion, supporting affordable housing, bolstering small business growth, and promoting diverse supplier engagement. Our commitment to economic empowerment and racial equity is reflected in our targeted investments and programs designed to address systemic challenges and drive meaningful change in underserved communities.

JPMCB Branch Network

JPMCB maintains a strong branch distribution and, while many banks are closing branches, JPMCB announced on February 6 plans to open more than 500 new branches over the next three years to provide greater access to financial services, including for low- and moderate-income (LMI) and rural communities. JPMCB takes a thoughtful approach to its branch network to ensure that branches are located near customers’ homes, places of work, and other activities. Throughout California, JPMCB maintains a branch network that serves LMI communities. During 2020-2023, JPMCB invested heavily in its branches to ensure that branches are refreshed and meet customer needs, including opening two Community Center branches which are located in historically underserved neighborhoods in Los Angeles and Oakland. Additionally, JPMCB established or revitalized dozens of other community-style branches – the vast majority of which are located in LMI areas. All of these branches provide a dedicated space to
host community events and financial health workshops that are open to the public. Within the state, JPMCB also remodeled dozens of other LMI branches to ensure a positive customer experience and improve customer access to JPMCB’s banking services.

JPMCB purchased some FRB branches. As always, JPMCB seeks to place branches in the right places for its customers. In some cases, FRB branches were across the street or very near to existing Chase branches. In those situations, JPMCB assessed the branches in overlapping areas to determine which would best serve its customers and their needs. With the transition, heritage FRB customers have access to JPMCB’s entire network including its 4,800 branches, 15,000 ATMs and industry leading digital capabilities. This is a big improvement from First Republic’s footprint, which was limited primarily to offices in New York, Florida and California.

Homeownership, SPCPs, and Foreclosure Prevention

JPMCB is committed to addressing the homeownership gap with a strategic approach that encompasses our comprehensive suite of business, data, policy, and philanthropic resources. Our efforts are particularly focused on enhancing housing affordability, stability, and increasing homeownership opportunities for Black, Hispanic, and Latino households. Highlights of our initiatives include:

- **S30 Billion Racial Equity Commitment**: As part of this commitment, JPMCB’s home lending business pledged an additional $8 billion in mortgages and $4 billion in refinancing loans to Black, Hispanic, and Latino households by 2025, underscoring our dedication to making homeownership more accessible and equitable.

- **Special Purpose Credit Program (SPCP)**: Launched in 2021, the SPCP aims to improve access to credit and offer credit on more favorable terms in minority majority census tracts. In the Retail channel, enhancements to this program include a homebuyer grant increase to $7,500, available in over 10,000 census tracts, to assist with one of the key factors impeding access to credit — down payments and closing costs, reflecting our responsiveness to community feedback. In the Correspondent channel, the SPCP supports regional mortgage lenders that originate loans in minority communities across JPMCB’s footprint by offering improved pricing and/or expanded credit guidelines through our Community Lending Program.

- **DreaMaker Mortgage Program**: Targeted towards LMI customers, the DreaMaker mortgage offers competitive rates, low down payments, and reduced mortgage insurance. Eligible customers can receive up to $7,500 in homebuyer grants, promoting broader access to homeownership.

- **Support for Heirs Property Homeowners**: JPMCB is actively involved in policy advocacy and supports initiatives designed to preserve generational wealth through homeownership. Our contributions include a $500,000 grant to [REDACTED CONTENT] for the establishment of an Estate Planning and Heirs’ Property Legal Clinic, aiming to educate attorneys and provide free legal services in estate planning across the country.

- **Policy Advocacy**: Our policy recommendations focus on preventing and resolving heirs’ property cases, ensuring families have access to estate planning options, and supporting the Uniform Partition of Heirs Property Act (UPHPA) to safeguard families from losing their homes due to partition sales.

- **Foreclosure Prevention**: JPMCB’s home lending business implemented a variety of forbearance programs to assist customers with both federally backed and non-federally backed loans. These programs, tailored in accordance with the guidelines of applicable investors/insurers, encompass options like unemployment and disaster forbearance. The specific details and eligibility criteria of
these programs vary based on the investor or insurer involved, ensuring a broad spectrum of support tailored to diverse customer needs during challenging times.

JPMCB remains steadfast in our commitment to close the homeownership gap, leveraging our resources to foster an equitable and inclusive housing market. We are dedicated to continuous dialogue and collaboration with community partners to refine and advance our strategies for impactful change.

**Level of Community Development Investment from JPMCB and FRB**

As an active and national leader in community development (CD) finance, JPMCB promotes affordable housing, economic development and the revitalization of LMI communities across the country. JPMCB’s level of community development investment has not diminished but rather increased since the acquisition of FRB assets. In JPMCB’s last CRA Performance Evaluation (covering 2014-2019), it conducted an average of $309 million in investments per year in California. In FRB’s last CRA Performance Evaluation (covering 2018-2021), it conducted an average of $265 million in CD investments per year in California. In 2023, JPMCB invested over $800 million in community development initiatives in California, far exceeding the combined annualized investments for the prior exam periods. [REDACTED CONTENT] in South Los Angeles, summarized below, is a great representation of our ability to respond to community needs while deploying our expertise and resources towards complex transactions.

- [REDACTED CONTENT] - Los Angeles, California: Once a center for a variety of retail businesses, the corner of South Vermont and Manchester Avenues was vacant for years. Co-developers [REDACTED CONTENT], [REDACTED CONTENT], and [REDACTED CONTENT] came together to build [REDACTED CONTENT] to address the needs of a historically marginalized and under-resourced neighborhood, where 78% of residents earn low-to-moderate incomes. [REDACTED CONTENT] is a new mixed-use seven-story development that will deliver 180 total units at 30%-60% AMI for seniors and families, retail stores, a transit plaza, and a Metro training facility. The first phase of construction saw the development of the SEED School of Los Angeles, the county’s first public charter boarding school that prepares students for careers in transportation infrastructure, STEM, and the humanities. The residential units, led by [REDACTED CONTENT] and [REDACTED CONTENT], will offer 62 permanent supportive housing apartments for seniors who have experienced chronic homelessness, and feature 118 affordable homes for families with low incomes, including 60 permanent supportive housing units. Commercial space will be anchored by a grocery-anchored retail space and auxiliary space, with a focus on local businesses. The retail and commercial space will generate an estimated 155 full-time jobs; in the meantime, through a local-hire program, the construction of [REDACTED CONTENT] itself will provide an estimated 120 new jobs and training opportunities for the local workforce. [REDACTED CONTENT] location along the Vermont Corridor, is home to the second busiest transit stop in the entire Los Angeles Metro system. In addition to the residential development, the project also focuses on public transit. This is exemplified by a new, landscaped public transit plaza located on Vermont Avenue, plus improved pedestrian and cycling connections to provide easy access to bus and rail lines for residents, and a Metro training center to facilitate employment into public transit jobs, all on the project’s site.

The project includes $92MM in construction loans, $64MM in LIHTC equity, and $40MM in New Market Tax Credit Qualified Equity to support construction of a transit oriented and mixed use, 180-unit affordable housing development aimed at low-income families, seniors experiencing homelessness and/or mental illness, and Transition Aged Youth in South Central Los Angeles. JPMCB Chase is also providing $40,000,000 in New Market Tax Credit Qualified Equity.
Investments for the construction of retail and workforce development space as part of the mixed-use development.

Affordable Housing

Advancing affordable housing has always been and will be a key firm goal. Our comprehensive approach involves leveraging our industry expertise, financial solutions, and a strategic combination of business and philanthropic efforts to support the entire lifecycle of affordable housing development. As part of JPMCB’s 2020 Racial Equity Commitment, the firm aims to significantly enhance our affordable housing efforts by financing the creation and preservation of 100,000 affordable rental units over five years. This ambitious goal involves $14 billion in new loans, equity investments, and other initiatives. By the end of 2021, we had already approved approximately $13 billion in loans, aiding the preservation of over 100,000 affordable housing and rental units across the United States. Key components of our strategy include:

- **Community Development Banking (CDB):** Over the past decade, CDB has provided over $2 billion in financing nationally to community development intermediaries, including Community Development Financial Institutions (CDFIs) and Low-Income Housing Credit (LIHTC) syndicators. In the Los Angeles area, notable partnerships include financing and banking services for [REDACTED CONTENT], a mission-driven CDFI focused on affordable home development in California.

- **New Market Tax Credits (NMTC) Investments:** Our NMTC investments are designed to deeply impact underserved communities by supporting affordable housing development, community facilities, and small businesses. These investments not only drive economic growth but also address critical social inequities.

- **Community Development Banking Capital Solutions:** This specialized team is dedicated to providing innovative financing options for affordable housing and community facilities. By collaborating with a wide range of capital sources, the firm is able to offer unique solutions that meet the diverse needs of community development projects.

- **$500 Million Commitment to Affordable Preservation Funds:** Of this commitment, $76 million has been allocated to support affordable housing preservation, demonstrating our ongoing dedication to maintaining and enhancing affordable living spaces.

- **Expansion of Lending to CDFIs:** In line with our Racial Equity Commitment, Community Development Banking (CDB) is expanding lending to CDFIs by $300 million. Efforts include potential financing arrangements with [REDACTED CONTENT], [REDACTED CONTENT], and [REDACTED CONTENT], further supporting affordable housing and community development across diverse regions in California.

- **Notable Projects:** In 2023, JPMCB invested in four significant projects across California, totaling $80.5 million in qualified equity investments. These projects, such as [REDACTED CONTENT] in Oakland and [REDACTED CONTENT] in San Rafael, exemplify the firm’s commitment to supporting minority-led organizations and initiatives that contribute to the vitality of their communities.

JPMCB's approach to affordable housing is multi-faceted, aiming not only to finance and preserve housing units but also to support the broader ecosystem of community development. Through targeted investments, strategic partnerships, and innovative financing solutions, we are dedicated to making a lasting impact on affordable housing availability and quality, particularly in underserved communities.
Philanthropy and Support for CDFIs

Our Firm believes that we are only as strong as the communities we serve and the economies they support. That core belief leads JPMCB to build opportunities in neighborhoods and communities across California and the globe. We understand we can play a role to drive local economies, helping communities grow and building personal prosperity. This is particularly important during challenging times, as we continue to help build a more sustainable, inclusive economy. Our efforts are focused where we believe we can leverage our business and expertise to create meaningful impact, including through:

- Building careers and skills
- Fueling business growth and entrepreneurship
- Catalyzing community development
- Strengthening financial health and wealth creation
- Promoting environmental sustainability within our communities

As a core component of this strategy, JPMCB is deeply committed to supporting CDFIs across California, leveraging a broad spectrum of financing solutions from philanthropy to debt. Our collaboration with CDFIs extends beyond financial support, offering resources like our Service Corps program, where JPMCB employees lend their expertise to enhance organizational sustainability and community impact. This commitment is evidenced by our significant contributions, including over $500,000 to Rise Economy's Resilience Fund to bolster capacity building, technical assistance, and funding to BIPOC (Black, Indigenous, People of Color) -led nonprofit organizations achieving CDFI certification.

Further affirming our role, a survey by the California Community Economic Development Association (CCEDA) in collaboration with Rise Economy highlighted JPMC as a leading supporter (top 2 in terms of philanthropic support) of CDFIs and CDCs in the state. This independent research underscores our efforts to bolster the CDFI ecosystem, particularly recognizing our impact on BIPOC-led CDFIs and our overarching dedication to sustainable community development and economic empowerment in underserved communities.

Supplier Diversity

JPMCB is committed to fostering diversity and inclusion within its supply chain, prioritizing partnerships with businesses owned by historically underrepresented groups, including minorities, women, military veterans, disabled veterans, service-disabled veterans, people with disabilities, and members of the LGBT+ community.

Our supplier diversity mission focuses on three main pillars: enhancing diversity in our supply chain, reflecting the demographics of our customers, and stimulating economic growth in the communities we serve. To build capacity and expertise among diverse suppliers, we invest in their development, ensuring they are well-positioned to collaborate with us and other corporations.

This commitment was further intensified in 2020 with our Racial Equity Commitment, where we pledged to spend an additional $750 million with Black, Hispanic, and Latino suppliers over five years, marking a significant step towards economic inclusivity and the empowerment of diverse entrepreneurs.

Small Business Banking

Under our 2020 Racial Equity Commitment, JPMCB pledged to extend an additional $2 billion in loans to small businesses in predominantly Black, Hispanic, and Latino communities over five years. Our Minority
Entrepreneur Consultant program, initiated in 2020, has successfully deployed 51 consultants across 13 key cities, focusing on coaching and advising Black, Latino, and Hispanic small business owners. This program has already mentored over 4,000 entrepreneurs, with plans for expansion in 2024 due to its success.

Recognizing the historical challenges in accessing capital faced by small business owners in communities of color, Chase aims to facilitate this through our Special Purpose Credit Program (SPCP) for business loans and credit cards, targeting businesses in majority Black, Hispanic, and Latino neighborhoods. This initiative has supported over 10,000 small businesses in accessing credit more responsibly across the 48 contiguous states, demonstrating our commitment to changing the landscape of financial support for small business owners in underserved communities.

Consumer Accounts and Customer Service

JPMCB has undertaken significant initiatives to enhance access to financial services in underserved communities. Since October 2020, we have inaugurated 10 Community Center Branches in Low and Moderate Income (LMI) neighborhoods, introducing a community-inspired model offering free financial health resources, skills training, local pop-up shops, and fintech innovations. Notably, two of these centers were opened in California in 2021, located in Oakland and South Los Angeles.

Additionally, as part of our Racial Equity Commitment, we opened 47 out of a planned 100 new branches in LMI areas nationally, significantly focusing on communities with larger Black, Hispanic, and Latino populations. By 2021, California boasted 250 JPMCB branches in LMI and communities of color.

Further supporting our community engagement, over 100 Community Managers have been appointed nationwide to serve as local ambassadors, fostering relationships with community leaders, nonprofit partners, and small businesses, while also offering one-on-one financial coaching and spearheading financial health initiatives within our branches.

Climate Sustainability

Sustainability and the management of climate-related risks and opportunities remain high priorities to JPMCB. Our sustainability strategy encompasses comprehensive efforts to finance sustainable development, reduce our operational environmental impact, and collaborate with clients to embrace green initiatives. Through significant commitments to renewable energy financing and developing sustainable solutions, we aim to lead by example in addressing climate change and promoting environmental stewardship within the communities we serve.

Our participation in Climate Action 100+ in 2020 was a step towards enhancing our engagement with companies on climate change, reflecting the importance we place on understanding and addressing the material economic risks and opportunities presented by climate change. Despite not renewing our membership, JPMorgan Asset Management (JPMAM) has significantly bolstered its sustainable investing efforts, including a dedicated team of 40 sustainable investing professionals and a global investment stewardship team. These teams, supported by in-house climate research specialists and 300 global research analysts, continue to review and minimize climate risk in our investment stewardship efforts. Our unwavering belief in the materiality of climate change to our clients' accounts underpins our comprehensive approach to investment stewardship and climate research.
Conclusion

JPMCB is deeply committed to advancing economic inclusion and equity across the communities we serve. We appreciate the opportunity to address these matters and share our comprehensive strategies aimed at enhancing financial inclusion, supporting affordable housing, bolstering small business growth, and promoting diverse supplier engagement. Our commitment to economic empowerment and racial equity is reflected in our targeted investments and programs designed to address systemic challenges and drive meaningful change in underserved communities. Our work to support the economic and financial well-being of the communities we serve is on-going, and emblematic of our deep commitment to communities across the state of California.

We will continue to foster and maintain open communication with Rise Economy and all our community partners. In the spirit of transparency, we are dedicated to engaging in proactive dialogues, seeking feedback, and adapting our strategies to better meet the needs of the communities we serve. The importance of accurate, consistent data underpins our global operations, requiring meticulous internal coordination to ensure our outcomes are reliable and in line with compliance standards. This is demonstrated in our annual ESG Reports, providing transparency around our progress in meeting our goals, like those that are part of our Racial Equity Commitment. We welcome continued dialogue with Rise Economy and its members on our progress.

We have also noted the feedback and requests for commitments expressed by Rise Economy throughout each of the core topic areas. We approach these discussions with a focus on constructive engagement, aiming to find meaningful ways to collaborate and make progress on shared objectives. Our commitment to enhancing economic inclusivity and community well-being guides our actions, as we continuously explore opportunities to align our initiatives with the aspirations of the communities we serve.

Respectfully,

[REDACTED CONTENT]
West Region Executive, Community Engagements

cc: Acting Comptroller Michael Hsu
Federal Reserve Board of Governors Vice Chair Michael Barr
March 19, 2024

[REDACTED CONTENT]
Examiner-In-Charge
JPMorgan Chase Bank, N.A
Office of the Comptroller of the Currency
7 Times Square, 13th Floor
New York, NY 10036

Via email: [REDACTED CONTENT]

RE: JPMorgan Chase CRA Exam

To [REDACTED CONTENT]:

We are writing to you on behalf of the Greater Rochester Community Reinvestment Coalition (GRCRC) to submit comments regarding JPMorgan Chase’s (JPMC) CRA Exam conducted by the Office of the Comptroller of the Currency (OCC) and covering 2020-2023.

The Greater Rochester Community Reinvestment Coalition (GRCRC) was launched in 1993 to generate and continue discussions about lending patterns in Rochester. GRCRC, convened by Empire Justice Center, has met with numerous banks and state and federal regulators during CRA exams and mergers, and submitted dozens of data-driven comments to the appropriate state and federal regulators who have oversight of the banks. GRCRC, Empire Justice Center, and its predecessor organization the Public Interest Law Office of Rochester, have released seventeen analyses of home mortgage lending, small business lending, and access to credit over the past 29 years. The organizations use data driven analyses to identify strengths and weaknesses in lending patterns and to generate discussions with the top financial depositories in the Rochester NY MSA.¹

In preparing for these comments, we asked JPMC to share its community development lending and investments and CRA-related grants (CDLI) with us. We used the numbers the bank shared with us in Tables 10 and 11 to calculate the total reinvestments JPMC has made in the Rochester community over the exam period and to estimate the percentage of deposits reinvested.

We met with examiner and community affairs staff of the OCC on March 14 to share some of the comments here as well as what we were seeing in the Rochester NY market. We thank them for taking the time to meet with us.

We shared a draft of this letter with JPMC on March 12th. The bank replied that its response to our letter will be after our deadline of March 19th to submit our letter to the OCC. We look forward to reading the bank’s response and further engaging with the bank to support the Rochester community.

As of June 30, 2023, JPMorgan Chase had $3.43 billion in deposits at its 23 Rochester metropolitan statistical area (MSA) offices for 14.5 percent of the depository market, making JPMC the third largest bank in the Rochester NY MSA. ² (See Table 1 in Appendix 1.) However, as JPMC is one of the country’s largest banks, the Rochester area comprises only 0.2% of the bank’s national deposits. GRCRC continues to be concerned, through our experience with JPMC and other large banks, that as banks grow, they focus less on smaller communities like the Rochester NY area.

These comments focus on four areas:

- JPMC’s Reinvestment of Deposits into the Community
- JPMC’s HMDA/Mortgage Lending
- JPMC’s CRA Small Business Lending
- JPMC’s Response to Community Needs and Opportunities for Investment

**JPMC’S REINVESTMENT OF DEPOSITS INTO THE ROCHESTER COMMUNITY**

We thank JPMorgan Chase for sharing a detailed summary with us of its CRA-related investments for 2020 through 2022. This information, as well as our calculations from publicly available mortgage lending and CRA small business lending data are shown in Tables 10 and 11 in the Appendix to assess how much of JPMC’s deposits were reinvested into the Rochester community during the exam period and how this compares to previous exam periods. We chose to focus on 2020 through 2022 because the 2023 mortgage and small business lending data won’t be publicly available in time to incorporate into our analysis.

JPMC reinvested a total of $288.89 million in CRA-eligible loans, grants, and investments in the Rochester community between 2020 and 2022, 3 years of the 4-year exam period. As seen in Table 10 (Table 10a) in the Appendix, this included:

- $145.95 million in community development loans in the following categories:
  - 8 – Affordable Housing
  - 2 – K-12 Education
  - 14 – Economic Development, Revitalization, and Stabilization
- $25.08 million of investments in 3 affordable housing development projects
- $795,000 for 6 CRA-eligible grants in the following categories:
  - K-12 Education – 1
  - Affordable Housing – 1
  - Other (Adult financial education & non-profit support) – 4
- $40.58 million in mortgage loans to low-moderate income households and/or in low-moderate income census tracts.
- $76.49 million in CRA small business loans to businesses in low-moderate income tracts and/or to businesses with gross annual revenues under $1 million

We are basing our calculations of how much of its deposits JPMC is reinvesting in the Rochester MSA community on its 2022 deposits, as that is the last year of the data we are using. JPMC invested a total of $288.89 million in the Rochester MSA during the current exam period, and the bank had $3.6 billion in deposits in 2022. We estimate that JPMC reinvested 7.9% of its deposits into the Rochester community during the 2024 exam period (2020-2022), for an annualized average of $96 million or 2.64% of deposits. (See Table 10, Table 10b.) JPMC’s annualized dollar volume of $96 million in reinvestments for this exam is a substantial rebound from the last exam on which we commented and similar to its annualized reinvestments for the 2011 and 2007 exams.

However, JPMC’s Rochester MSA deposits have grown by 83% since the 2007 exam while its annualized reinvestments have only grown by 1%. Due to the large increase in its deposits and lack of growth in average annual reinvestments, JPMC’s annualized percent of deposits reinvested in the Rochester community for this exam is only 2.64%, 45% less than its 2007 exam rate of 4.78% and 62% less than the 2011 exam rate of 6.96%.

Today, JPMC has a substantially lower reinvestment rate than some of its peers. In October 2021, GRCRC commented on the CRA performance of [REDACTED CONTENT], then the region’s 4th largest bank. We calculated that [REDACTED CONTENT] had annualized reinvestments of $205 million for a rate of at least 7% per year.3 In our May 2022 comment letter on [REDACTED CONTENT] CRA performance, we calculated that [REDACTED CONTENT], the area’s 7th largest bank, had annualized

reinvestments of $91 million, for a rate of at least 6.7% per year. These reinvestment rates are at least 2.5 times higher than JPMC’s 2.64% annualized reinvestment rate. The region’s largest bank, M&T, also had substantially higher annual reinvestments in dollar volume and percentage of deposits reinvested than JPMC. During its 2019-March 2023 exam period, M&T reinvested an annualized average of $262 million or 5.34% of its deposits into the Rochester community.

We were also able to track how JPMC’s CRA-related reinvestments into the Rochester NY MSA changed between 2020 and 2022 because we had annual mortgage and small business lending numbers and the bank gave us its CDLI numbers by year. Table 11 shows that JPMC’s total annual CRA-related reinvestments were $5.9 million or 6% higher in 2022 than in 2020. However, because the bank’s deposits grew each year, JPMC’s reinvestments as a percentage of its deposits remained very low and were 0.3 points or 9% lower in 2022 than in 2020.

The Community Reinvestment Act obligates banks to serve the communities in which they are located. JPMC has 23 branches in the Rochester NY MSA and holds 14.5% of the area’s deposits. JPMorgan Chase has an obligation to serve the Rochester community. As seen by its rate of 6.96% in reinvestments during its 2011 exam period and compared to its peers, the bank can do better. We urge JPMC to grow over the next several years its annual reinvestments in its Rochester NY assessment area to 7% of its deposits, which is $255 million at the 2022 level of deposits. We believe JPMC can take a significant step toward this by increasing its annual reinvestments by $100 million to an annualized average of $196 million or 5.4% of 2022 deposits.

We are mindful that we did not include the 2023 reinvestments in our analysis, so we urge the OCC examiners and JPMC to use our methodology and include these reinvestments (with the 2023 deposits as the benchmark) to see if JPMC increased its annualized reinvestments and the percentage of deposits reinvested.

**JPMC’S HMDA LENDING IN MSA and UNDERSERVED COMMUNITIES**

Our lending analysis focuses on originated loans. We examine lending from 2019-2022 to align with the publicly available data for the exam period with a baseline of 2019 before the exam period.

This section on JPMC’s HMDA lending is divided into the following categories:

- Total number loans and total dollar volume mortgage lending

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Home purchase loans
JPMC’s lending compared to its peers

JPMC Bank’s Total Mortgage Lending

Total Loans

In 2022, JPMC originated 251 mortgage loans (1st lien loans on owner-occupied (principal and secondary), 1-4 family site-built units) in the Rochester MSA compared to 360 loans in 2019, a decrease of 30 percent.6 (See Table 2 in Appendix). JPMC’s low point for total loan originations was 2020 for all categories. Loan originations then almost doubled for all categories in 2021 while total lending the Rochester MSA declined to near 2020 levels in 2022. Lending, however, in all of the formerly redlined communities consistently increased between 2020 and 2022.

While JPMC’s total number of mortgage loan originations in the Rochester NY MSA was lower in 2022 than in 2019, the bank performed better in 2022 than 2019 in the city of Rochester, to Black and Latine households, in low-moderate income census tracts, and in majority communities of color. Compared to 2019, JPMC’s 2022 lending was:

- 25% higher in the city.
- 2% higher among Black/Latine households.
- 9% lower among low-moderate income households.
- 31% higher in low-moderate income census tracts
- 115% higher in majority nonwhite census tracts (50% or more nonwhite residents).

Despite its lower Rochester MSA lending in 2022, JPMC made more loans in almost every community category, resulting in a greater distribution of its loans among these categories in 2022 than in 2019 (see the bottom section of Table 2). JPMC’s 2022 performance was the same as or stronger than that of all financial institutions (AFI) in the distribution of its loans across all of the communities. Of the 251 loans JPMC made in 2022,

- 16% were in the city, compared to 9% in 2019, and 12% for AFI
- 20% were to Black and Latine households, compared to 13% in 2019, and 11% for AFI
- 43% were to low-moderate income households, compared to 33% in 2019, and 43% for AFI
- 22% were in low-moderate income census tracts, compared to 12% in 2019, and 21% for AFI

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6 Empire Justice Center uses the Static HMDA LAR data from the CFPB website, at: [https://ffiec.cfpb.gov/data-publication/](https://ffiec.cfpb.gov/data-publication/).
• 11% were in nonwhite census tracts, compared to 4% in 2019, and 8% for AFI

Total Dollar Volume Lending

In 2022, JPMorgan Chase originated an aggregate of $46.65 million in total mortgage lending (1st lien loans on owner-occupied (principal and secondary), 1-4 family site-built units). As seen by Table 3 in the Appendix, this was $8.2 million or 15% less than the bank’s dollar volume of lending in 2019 and $39.7 million or 46% less than in 2021. The 2019 to 2022 decrease is significantly less than the 30% decrease in the total number of loans during the same time period.

Despite the decrease in the Rochester NY MSA, JPMC’s total dollar volume of lending increased or held steady in all other categories. Between 2019 and 2022, JPMC’s dollar volume of lending:

• Increased by 33% in the city
• Increased by 1% among Black and Latine households
• Increased by 6% among low-moderate income households
• Increased by 67% in low-moderate income census tracts
• Increased by 148% in nonwhite census tracts.

The proportions of JPMC’s dollar volume of lending going to other areas of the Rochester community in 2022 were greater than those of 2019 (see bottom section of Table 3) and exceeded the average proportions of all financial institutions (AFI) in several categories except to LMI households and census tracts.

Of the $46.65 million JPMC originated in the Rochester MSA in 2022,

• 10% went to the city, compared to 6% in 2019, and 8% for AFI
• 15% went to Black and Latine households, compared to 12% in 2019, and 9% for AFI
• 27% went to low-moderate income households, compared to 21% in 2019, and 29% for AFI
• 14% went to low-moderate income census tracts, compared to 7% in 2019, and 15% for AFI
• 6% went to nonwhite census tracts, compared to 2% in 2019, and 5% for AFI

Note that, for every year, the proportions of the total dollar volume of lending going to these historically, and still, marginalized communities are less than the proportions of the number of loans going to them. This suggests that the mortgages, and home values, in these communities are on average lower than in other parts of the Rochester MSA.
JPMC’s Home Purchase Lending

Home Purchase Loan Originations

We also analyzed JPMC’s home purchase originations (1st lien loans on owner-occupied, (principal and secondary) 1-4 family site-built units). As can be seen by Table 4 in the Appendix, JPMC originated 119 home purchase loans in the Rochester NY MSA in 2022, 32% fewer than in 2019. In 2020, the first year of the COVID-19 pandemic, JPMC made only 80 loans. While the bank’s lending recovered somewhat in 2021, its 2022 MSA lending is essentially unchanged from 2021.

JPMC also did fewer home purchase loans in two of the historically marginalized communities in 2022 than in 2019, while doing more loans in the other three categories. Compared to 2019, JPMC’s 2022 home purchase loan originations were:

- 10% more in the city.
- 10% fewer among Black and Latine households.
- 17% fewer among low-moderate income households.
- 24% more in low-moderate income census tracts.
- 80% more in nonwhite census tracts.

JPMC Bank’s distribution of its home purchase loans was greater in 2022 than in 2019 in all the traditionally redlined and underserved categories. JPMC’s distribution was higher than that of all financial institutions (AFI) in all but one category (see bottom section of Table 4). Of the 119 home purchase loans made by JPMC in 2022,

- 19% were in the city, compared to 12% in 2019, and 13% for AFI
- 23% were to Black and Latine households, compared to 17% in 2019, and 13% for AFI
- 41% were to low-moderate income households, compared to 34% in 2019, and 42% for AFI
- 26% were in low-moderate income census tracts, compared to 14% in 2019, and 22% for AFI
- 15% were in nonwhite census tracts, compared to 4% in 2019, and 9% for AFI

JPMC’s Mortgage Lending Compared to Its Peers

GRCRC believes in the importance of comparing the lending of a bank to its peers. As JPMorgan Chase is the third largest bank in the Rochester area, we compare its lending to its closest peers, the other of the eight largest banks in the Rochester MSA. In 2022, JPMC ranked
third in deposits in the Rochester MSA, with 14.5 percent of the market, so these might be considered benchmarks as well.

Total Mortgage Lending Compared to Peers

Our first comparison is of the total number of mortgage originations by the top 8 banks (1st lien loans on owner-occupied (principal and secondary), 1-4 family site-built units). As seen on Table 5 in the Appendix, JPMC originated 251 mortgage loans in 2022, making JPMC the 6th largest lender among the top 8 banks. JPMC’s 1.5% Rochester MSA mortgage loan market share is dramatically lower than its 14.5% depository market share, and its 6th place ranking among the top 8 banks is lower than its 3rd place depository market share ranking.

Another way a depository can demonstrate its CRA commitment to a community is by maintaining market shares in the various target communities that are similar to or greater than its overall MSA market share (middle part of table). JPMC met or exceeded its 1.5% MSA total lending market share in every historically redlined/underserved community. In 2022, JPMC had:

- 2.0% of the market in the city
- 2.5% of the market among Black and Latine households
- 1.5% of the market among low-moderate income households
- 1.5% of the market in low-moderate income census tracts
- 2.0% of the market in nonwhite census tracts

JPMC’s distribution of its total lending to all five target communities was similar to or higher than the distribution of all financial institutions (AFI) and the “Top 8” banks (bottom part of table).

Dollar Volume Lending Compared to Peers

In 2022, JPMC made $46.65 million in mortgage lending in the Rochester MSA, capturing 1.5% of the market and ranking 6th among the top 8 depositories in the Rochester MSA. (See Table 6 in the Appendix.) This is substantially less than its depository market share and lower than its 3rd place depository market share ranking. While it may not be feasible for a bank to capture 14% of the mortgage lending market, we want to point out that Canandaigua NB (the area’s 2nd largest bank with 15% of the market) ranked 1st among the top 8 banks in the total number of loans and dollar volume of lending, capturing 6.6% and 8.7% respectively, of these markets.

JPMC’s dollar volume market share in underserved markets was greater than its MSA lending market share in 3 of the 5 market categories. Among Rochester’s various markets, JPMC had a market share of:
• 1.7% in the city
• 2.3% among Black and Latine households
• 1.3% among low-moderate income households
• 1.4% in low-moderate income census tracts
• 1.8% in nonwhite census tracts

In the distribution of its dollar volume of lending among the various Rochester community categories, JPMC Bank exceeded the percentages of AFI in 3 of the 5 categories and exceeded the area’s “Top 8” banks in all categories (bottom section of Table 6).

Home Purchase Lending Compared to Peers

JPMC Bank made only 119 home purchase loans (1st lien loans on owner-occupied (principal and secondary), 1-4 family site-built units) in the Rochester MSA in 2022. This corresponds to 1.2% of the market, placing JPMC 7th among the Rochester area top 8 banks in home purchase loan originations (see Table 7 in the Appendix), substantially less than its depository market share, and much lower than its 3rd place depository market share ranking.

JPMC’s home purchase loan market shares in all community categories were the same as or more than its Rochester MSA market share of 1.2%. JPMC captured:

• 1.8% of the market in the city
• 2.2% of the market among Black and Latine households
• 1.2% of the market among low-moderate income households
• 1.4% of the market in low-moderate income census tracts
• 2.0% of the market in nonwhite census tracts

JPMC’s distribution of its home purchase loans to the above categories was more than the distributions for the top 8 banks and AFI for all but the percentage of loans to LMI households.

A Snapshot of JPMC’s 2023 Mortgage Lending in Monroe County

Our coalition member, the [REDACTED CONTENT] (the Office), a service of the [REDACTED CONTENT], often does an analysis of a bank’s lending in Monroe County and the 4 quadrants of the city of Rochester. For this letter, the Office did a search of Monroe County records for all variants of “JP Morgan Chase, NA” for January 1, 2023 to December 31, 2023
and found 106 mortgages for 1 and 2-family dwellings. Following is a summary of what the Office found. (See also attached memo.)

- Of the 106 1-2 family loans, 34 (32%) were for city of Rochester residences and 72 (68%) were in properties in the rest of Monroe County.
  - 7 of the city loans were in the SW Quadrant (19th Ward plus five adjacent neighborhoods), suggesting balance across the city’s quadrants.
  - 32 of the 34 city residential loans (94%) were for owner-occupied properties. “This is a commendable very high percentage, indicating intentionality on the part of Chase!”
  - 22 of the 34 city loans, or 65%, were used to purchase a home. There were only 5 refines, 5 loan modifications and no HELOCs.

[REDACTED CONTENT] of the [REDACTED CONTENT] concluded his analysis with, “Although Chase is a relatively small player in Monroe County home purchase lending, we found their support for owner-occupancy very welcome. Based on the above metrics, a larger volume of Chase mortgages for owner-occupants would be welcome in the future.”

GRCRC urges JPMC Bank to financially invest in neighborhood-based organizations like the [REDACTED CONTENT] and the [REDACTED CONTENT] as they are critical to supporting Rochester’s neighborhoods and small businesses.

**Conclusion: JPMC’s Mortgage Lending**

GRCRC believes that traditionally underserved families and communities benefit more when they obtain mortgages from lenders with a local depository presence than from little-regulated mortgage companies or lenders with no local CRA obligations. It benefits both the borrower and the bank when borrowers develop additional financial relationships with their mortgage lender. The Rochester area top 8 banks are losing this advantage of multiple financial relationships; in 2022 they captured only 19% of the owner-occupied home purchase lending market.

Since 2014 JPMorgan Chase has not been a big home purchase mortgage lender; its biggest year was 2019 when the bank originated 175 home purchase loans for only 2% of the market. Between 2010 and 2013, JPMC made between 274 and 348 loans for 3-4% of the Rochester MSA market.

As we all know, March 2020 was the start of the COVID-19 pandemic. JPMC has yet to fully recover its home purchase mortgage lending to the level it was in 2019. This may be a sign that

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7 According to the Office, the mortgages were primarily for purchases, plus a few refi’s and loan modifications.
the bank is pulling further back on its mortgage lending in Rochester, an MSA that is a drop-in-the-bucket of its national depository market.

Racial Disparities in Homeownership and Lending

In October 2023 the Office of the New York State Attorney General (OAG) released a report on racial disparities in homeownership, finding that, “People of color have lower rates of homeownership in New York,”⁸ and that,

- Homeownership in the state is concentrated in white households and neighborhoods. White households are more than twice as likely to own their home as compared to Black or Latino households.
- Lower homeownership rates for people of color are present in every single region in the state, showing the pervasive and systemic challenges to closing the homeownership gap.
- Statewide, 7.6% of purchase applications were from Black residents and 9.5% were from Latino residents, approximately half of each group’s representation in the overall state population.
- People of color who apply for loans for purchase mortgages were more likely to be denied.
  - Applicants of color in New York are denied home purchase mortgages at higher rates than are white applicants.
  - This is true even when controlling for credit score, income, size of loan, debt-to-income ratio, loan to-value ratio, and year of application.⁹

A look at the distribution of bank branches further illustrates the broken relationship between neighborhoods of color and lenders. The map of Rochester in Figure 5 shows bank branches [as of June 2022] almost exclusively located in majority white neighborhoods. Most residents in neighborhoods of color must travel much farther than their white neighborhood counterparts to reach a bank.¹⁰

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¹⁰ Ibid, p. 16.
According to the OAG, while not illustrated like the above map, “This pattern is not unique to Rochester: We see similar distributions across the state.”

The OAG looked at a variety of data points, controlling for credit score, income, DTI, and LTV. It found that in Rochester, a Black applicant is 68% more likely to be denied than a white applicant. The OAG report does not break out the data by lender. So, while it describes the problem in aggregate, it is not possible to pinpoint a specific lender and ask them to change specific practices.

In January 2024, the NYS Department of Financial Services (DFS) issued a report that describes lending by individual lenders. The Rochester tables document lenders that originated at least 100 loans in the Rochester MSA. The report includes the number and percentage of loans to minority borrowers and in majority-minority census tracts. The report also includes other counties and MSAs in which JPMC has branches and thus CRA obligations.

The DFS found that in the Rochester MSA in 2022, JPMC originated:

- 11% of its loans in majority-minority tracts or 29 loans
- 26% of its loans to minority borrowers or 64 loans

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11 Ibid, p. 16.
14 Ibid, pp. 51-52.
Considering the OAG report documenting disparities in lending even when controlling for underwriting criteria, and the DFS report documenting lending by lender, we encourage the OCC to conduct a fair lending exam as warranted and include its findings in JPMC’s CRA Performance Evaluation.

Considerations for a Special Purpose Credit Product

Chase’s $5,000 Homebuyer Grant\(^\text{15}\) available in 6,700 minority census tracts across the country may be a special purpose credit program (SPCP). We want to share here the importance of such products in meeting the credit needs of Black and brown people—those who have been historically redlined and continue to be discriminated against, and how to best design these products.

GRCRC members, including [REDACTED CONTENT], [REDACTED CONTENT], [REDACTED CONTENT], [REDACTED CONTENT], and [REDACTED CONTENT], were at an in-person meeting convened by JPMC last year. We are using information shared during that meeting, as well as other information gathered through research, to formulate these comments.

Research from [REDACTED CONTENT] documents that younger borrowers are struggling with credit card and auto loan payments. In 2021, delinquencies for borrowers in their 20s and 30s were running at 3.5%, up from 1.5% in 2020. High rents are making it harder for millennials to save for a mortgage, when PITI would be lower than their rent. Hence the need for both larger grants for 1\(^\text{st}\) time borrowers and flexible underwriting.

The median home price in the Rochester area is $200,000 (as of Q4 2022) and rents have increased. High rents and inflation in food and utilities make it virtually impossible for a tenant at 80% area median income to save. First generation, LMI borrowers will also struggle to save the $10,000 plus needed for downpayment and closing costs. New York also has high property taxes making homeownership more unaffordable. The mismatch of incomes and basic living costs mean that residents are living paycheck to paycheck. As described in another section below, the result of this is that, as of 2017, 50% of city of Rochester residents had subprime credit. While we understand the importance of saving for closing costs and down payment assistance, it seems that 1\(^\text{st}\) generation families from no-/low-wealth backgrounds will need a much larger infusion of down payment and closing cost assistance than has been the norm over the past few years.

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\(^{16}\) https://libertystreeteconomics.newyorkfed.org/2023/02/younger-borrowers-are-struggling-with-credit-card-and-auto-loan-payments/
Even though JPMC Bank is headquartered in New York City, the bank needs to look at the costs in the different markets across its footprint. JPMC’s home mortgage team should look at the total cost of housing (principal, interest, taxes, and insurance) in Rochester and other parts of upstate and western New York and then design its SPCP to fit these markets.

To support successful homeownership among Rochester’s Black and Brown families who continue to be impacted by the history of redlining and exclusion in this community, and considering income, rents and housing prices in Rochester, we believe a SPCP should:

- Include payment and closing cost assistance totaling $10,000 or above.
- Be a portfolio product with flexible underwriting.

We will be convening GRCRC members to fine tune the details of what is needed for a SPCP to work in Rochester. We would be happy to share these details with JPMC as it develops its SPCP, particularly around its eligibility and underwriting criteria, to ensure that it works for the Rochester market.

In addition to SPCPs, as seen by GRCRC member [REDACTED CONTENT], lenders need to improve access to homeownership through expanding affordable mortgage options to include products and staff who successfully work with the Section 8 Housing Choice Voucher program, down payment assistance programs and IDAs to encourage savings and improve downpayment resources as well as limiting upfront costs and interest rates. Also, the Rochester community needs post purchase lending products that safely and affordably allow homeowners to finance home repairs.

Meanwhile affordable owner and renter housing developed by not for profits such as [REDACTED CONTENT], [REDACTED CONTENT], and [REDACTED CONTENT] will be essential to serving LMI tenants and first-time homeowners. For more on the GRHP projects, see below in our Community Development section.

**JPMC’S BANK SMALL BUSINESS LENDING**

**CRA Small Business Lending**

Table 8 in the Appendix shows JPMC’s CRA small business loans and dollar volume of lending from 2019 to 2022.
Number of Small Business Loans

JPMorgan Chase made 3,462 small business loans in the Rochester MSA in 2022, 7% fewer than in 2019 and 17% more than in 2021 (see top section of Table 8). Despite the decrease in its loans in the MSA, the bank made more small business loans in all but one of the various categories in 2022 than in 2019.

In 2021, JPMC made:

- 627 loans to businesses in low-moderate income census tracts, 15% more than 2019
- 3,439 loans of $100,000 or less, 7% fewer than 2019
- 618 loans of $100,000 or less to businesses in low-moderate income census tracts, 15% more than 2019
- 2,359 loans to businesses with gross annual revenues under $1 million, 22% more than 2019
- 409 loans to businesses with gross annual revenues under $1 million in low-moderate income census tracts, 55% more than 2019

JPMC performed similar to or better than all financial institutions (AFI) in 2022 in its distribution of small business loans to businesses in LMI tracts, businesses with gross annual revenues less than $1 million, and these smaller businesses in LMI tracts.

Dollar Volume of Small Business Lending

In 2022, JPMC did $46.3 million in small business lending in the Rochester MSA. As seen at the bottom half of Table 8, this was 7% less than in 2019 and 31% less than in 2020. JPMC’s dollar volume of small business lending for loans to businesses in LMI tracts and for smaller loans (<=$100,000) was 5% lower in 2022 than 2019. The bank increased its dollar volume of lending for smaller loans in LMI tracts, to businesses with gross annual revenues under $1 million and to these businesses in LMI tracts. JPMC’s dollar volume of small business lending in the Rochester MSA was at its highest level in 2020 while the number of loans it made was at its lowest level.

In 2022, JPMC made:

- $8.5 million in loans to businesses in low-moderate income census tracts, 5% less than 2019
- $39.5 million in loans of $100,000 or less, 5% less than 2019
- $7.7 million in loans of $100,000 or less to businesses in low-moderate income census tracts, 15% more than 2019
• $24.5 million in loans to businesses with gross annual revenues under $1 million, 8% more than 2019
• $4.2 million in loans to businesses with gross annual revenues under $1 million in low-moderate income census tracts, 30% more than 2019

JPMC did not do as well as all financial institutions in the distribution of its dollar volume of lending to businesses in LMI tracts, but outperformed AFI to businesses with gross annual revenues under $1 million in LMI tracts and to businesses with gross annual revenues under $1 million.

**JPMC’s Small Business Lending Compared to Peers**

As with mortgage lending, we compare a bank’s small business lending to its peers, the other depositories with the greatest market shares in the Rochester NY MSA. Table 9 in the Appendix compares the small business loans, dollar volume lending and market shares for the Rochester MSA’s top 8 banks for 2022. ([REDACTED CONTENT], the 9th largest bank, was substituted for [REDACTED CONTENT], as [REDACTED CONTENT] did not report small business lending.)

**Number of Loans Market Share**

In 2022, with 3,462 loans, JPMC captured 17.7% of the small business loan market in the Rochester MSA, exceeding its 14.5% depository market share and making JPMC the largest small business lender among the top 8 banks in terms of number of loans (see top part of Table 9). JPMC fell short of its overall MSA market share among businesses in LMI tracts and exceeded its MSA market share among businesses with gross annual revenues under $1 million and among businesses with gross annual revenues under $1 million in LMI census tracts. In 2022, JPMC had a market share of:

- 15.3% among businesses in low-moderate income census tracts
- 18.6% in loans of $100,000 or less
- 16.2% in loans of $100,000 or less to businesses in low-moderate income census tracts
- 23.7% among businesses with gross annual revenues under $1 million
- 20.0% among businesses with gross annual revenues under $1 million in low-moderate income census tracts

JPMC Bank underperformed the Top 8 Banks in the distribution of its small business loans to businesses in LMI tracts and exceeded the Top 8 in the percentage of its loans going to businesses with gross annual revenues under $1 million and to businesses with gross annual revenues under $1 million in LMI census tracts.
Dollar Volume Lending Market Share

In 2022, with $46.3 million in lending, JPMC captured 7.3% of the dollar volume of small business lending in the Rochester MSA, placing it 3rd among the top 8 banks. (See the bottom half of Table 9.) JPMC’s dollar volume market share of 7.3% is one-half its depository market share of 14.5%, and its 3rd place market share rank is the same as its depository market share rank.

JPMC’s dollar volume of lending market share among businesses in LMI tracts did not match its overall MSA market share, but its market shares among businesses with gross annual revenues under $1 million and businesses with gross annual revenues under $1 million in LMI census tracts exceeded its MSA market share. Compared to its overall dollar volume market share of 7.3%, in 2022 JPMC captured:

- 5.8% of the dollar volume of lending to businesses in low-moderate income census tracts
- 15.0% of the dollar volume of lending for loans of $100,000 or less
- 14.2% of the dollar volume of lending for loans of $100,000 or less to businesses in low-moderate income tracts
- 11.0% of the dollar volume of lending to businesses with gross annual revenues under $1 million
- 9.4% of the dollar volume of lending to businesses with gross annual revenues under $1 million located in low-moderate income census tracts

Averaging $13,380 per loan, JPMC has the smallest average loan size among the top 8 banks, and the average size of its loans declined consistently between 2020 and 2022 (see Table 8). This small loan size, combined with the facts that over 99% of JPMC’s loans were $100,000 or less and that 85% of its dollar volume of lending was in loans of $100,000 or less (both of which are the largest proportions among the top 8 banks) indicate that JPMC was the largest credit card lender among the top 8 banks and did the bulk of its small business lending via credit cards.

With respect to the distribution of its dollar volume of lending, JPMC did not match the “Top 8” banks in dollar volume of lending to businesses in LMI communities, while exceeding the Top 8 in dollar volume of lending to businesses with gross annual revenues under $1 million and to businesses with gross annual revenues under $1 million in LMI tracts (bottom of Table 9).

Small Business Lending Summary

To stabilize the economy, create jobs and build wealth in the Rochester community, area businesses need access to affordable, responsible credit. This has been especially true as businesses continue to struggle with some of the highest inflation rates since the 1980s.
GRCRC is concerned that JPMorgan Chase is doing the bulk of its CRA small business lending via higher cost credit card loans (as suggested by the data) rather than taking the time and working to market, underwrite, and originate more affordable “traditional” small business loans.

We are pleased to see that JPMC is doing significant proportions of its loans and dollar volume of lending to businesses with gross annual revenues under $1 million; we are again concerned that many of these loans may be the higher cost credit card loans. These smaller businesses are where we find new businesses, especially those started and owned by Black, Brown and immigrant entrepreneurs. While many businesses, including smaller businesses, appreciate the flexibility of credit cards, we urge JPMC to work with Rochester area smaller businesses to help them access more affordable credit to help their businesses grow and thrive.

**JPMC BANK’S REINVESTMENT OF DEPOSITS INTO THE COMMUNITY, RESPONSE TO COMMUNITY NEEDS AND OPPORTUNITIES FOR INVESTMENT**

Included in this section is information several GRCRC members shared with us on local community development needs, how JPMC has worked with and/or funded their organizations to address them, and suggestions on how JPMC might help address emerging and ongoing needs.

**Reinvesting Deposits into the Community**

We urge JPMC Bank to actively work with GRCRC members and other organizations in the Rochester area to grow its CRA-related lending and investments within the Rochester MSA to 7% of its area deposits annually. This would be about **$255 million per year** in reinvestments based on the June 2022 deposits. The bank can start by investing in some of the community development opportunities laid out in this section. (See section at the beginning of this letter for our analysis of the bank’s reinvestments.)

First, we want to acknowledge and thank JPMC for some of the ways the bank has supported the work of GRCRC member organizations. We summarize these in this next section, at times including suggestions for additional opportunities.

**Specific Community Development Activities**

GRCRC members shared with us the following community development activities that JPMC is currently supporting.

JPMorgan Chase has generously supported several of the [REDACTED CONTENT] programs during the 2020-2023 time frame. These include the Interrupt Racism Summit, the
[REDACTED CONTENT], and the [REDACTED CONTENT] program. [REDACTED CONTENT] received $30,000 in 2020, $25,000 in both 2021 and 2022 and $35,000 in 2023 in support of our mission for greater equity.

- The Interrupt Racism Summit is an immersive learning experience for youth and adults, thoughtfully curated for attendees to identify, interrupt, and dismantle processes of systemic racism. The Summit includes keynote speakers and breakout sessions. The Summit is designed to be a transformative, inclusive opportunity for everyone, creating space for those already committed to antiracist and DEI-related work and those just beginning. The format is designed to promote growth, provide resources and advance equitable opportunities for all our community members. The Summit draws upwards of 500 people annually.

- The [REDACTED CONTENT] is part of the U.S. Small Business Administration’s (SBA) network of 140 interconnected centers across the country. The [REDACTED CONTENT] provides a unique array of services specifically for female entrepreneurs, including one-on-one counseling, training, networking, workshops, technical assistance, and mentoring on numerous business development topics, including business startup, financial management, marketing, and procurement. The [REDACTED CONTENT] focuses on serving women entrepreneurs from socially and economically disadvantaged communities in the Rochester Area. The goal of [REDACTED CONTENT] is to support women entrepreneurs in creating stable, financially successful businesses and to create a more equitable and prosperous Rochester through the small business community. While SBA provides core funding for [REDACTED CONTENT], each center must secure matching funds making additional funders such as JP Morgan Chase critical to the center’s operations.

- [REDACTED CONTENT] Black Scholar program provides academic recognition, college readiness assistance, and scholarship incentives to students who achieve and maintain a ‘B’ average or better (83% and up) throughout high school. The program supports students in the Greater Rochester metropolitan area (the City of Rochester and the 6 surrounding counties).

GRCRC thanks JPMorgan Chase for this financial and in-kind support of these [REDACTED CONTENT] of Rochester initiatives.

The [REDACTED CONTENT] is a not-for-profit lender (a CDFI) dedicated to the creation and preservation of affordable housing in the Rochester NY region, including through construction lending and single-family homeownership programs. [REDACTED CONTENT] single-family homeownership work includes the following: 1) acquisition-rehab-resale of vacant properties for purchase by first-time LMI buyers through [REDACTED CONTENT] and [REDACTED CONTENT]; 2) new construction of energy efficient, single-family homes for purchase by first-time LMI buyers currently as a developer partner through the City’s [REDACTED CONTENT] program.
Since 2002, the [REDACTED CONTENT] has been rehabilitating vacant homes, revitalizing neighborhoods, and providing quality affordable homeownership opportunities in the City of Rochester. [REDACTED CONTENT] provides management services to the program as well as needed financing. The [REDACTED CONTENT], [REDACTED CONTENT], and public and private partners of [REDACTED CONTENT] have acquired and rehabilitated more than 850 vacant homes located in city of Rochester neighborhoods and sold them to first-time homebuyers. [REDACTED CONTENT] properties are sold at prices that are affordable to low- and moderate-income homebuyers and that are in line with comparable values of similar neighborhood properties. [REDACTED CONTENT] houses carry a 15-year affordability period (homebuyers agree to live in their houses for 15 years or sell to another income-eligible buyer during the affordability period). This program requirement ensures that the investment made to rehabilitate a [REDACTED CONTENT] property results in affordable housing that is sustainable for at least 15 years. This residency requirement also ensures these homes remain owner-occupied for at least 15 years which in turn helps with neighborhood stability.

In 2019, the [REDACTED CONTENT] model was expanded into suburban Monroe County. Through [REDACTED CONTENT], the [REDACTED CONTENT] rehabilitates vacant county properties for purchase by LMI first-time homebuyers. Eight homes have been completed and sold in the county to date.

GRHP develops newly constructed, energy efficient homes for purchase by LMI first-time homebuyers on vacant parcels in the city of Rochester. Currently, GRHP (through its general contractor partner) is building 24 new homes in a targeted, formerly redlined area through the City of Rochester’s [REDACTED CONTENT]. To date, 15 homes have been completed and sold to income eligible first-time homebuyers. Four additional homes are currently underway (and under contract with buyers) and 5 more will begin construction in spring 2024. More than 250 interested buyers applied for these 24 project homes (although a number of these applicants did not meet program qualifications). For all of these programs, homebuyers must be able to qualify for a conventional, fixed rate mortgage and contribute a minimum of $1,500 of their own money toward the purchase of the home. Mortgage lenders who offer products that fit with the characteristics of these programs (including underwriting that allows for the CLTV levels these programs carry) is key to their success. In addition, these programs would benefit from flexible sources of subsidy (foundation grants) that could be used to help cover the difference between total development cost and sale price and support the project’s energy goals.

For decades, JPMC has been a steady and critical financing partner supporting the [REDACTED CONTENT] and [REDACTED CONTENT] affordable housing missions including single-family homeownership programs serving low-moderate income first-time homebuyers.
At the end of 2023, [REDACTED CONTENT] and [REDACTED CONTENT] closed on their 10th HOME Rochester acquisition and construction financing facility with JPMC as the lead lender. This is a $14 million facility with a three-year term. [REDACTED CONTENT] will be looking to establish the next facility with JPMC in 3 years (2026). As of mid-2023, 850 homes have been rehabbed through this program.

GRCRC is grateful for JPMC’s longtime support of [REDACTED CONTENT] and [REDACTED CONTENT], and we hope it will continue.

It is our understanding that JPMC is active in other parts of the affordable housing space, as well, including providing construction loans to LIHTC financed projects, in particular. The [REDACTED CONTENT] is developing the [REDACTED CONTENT] project downtown; it looks like JPMC has provided some financing for this project.

Local developers will likely break ground on LIHTC projects in the next three years, and JPMC will have an opportunity to provide a financing proposal for these projects. If JPMC could offer a reduced interest rate that would help these projects, [REDACTED CONTENT], as a CDFI construction lender, would also be interested in participation shares of these loans.

The [REDACTED CONTENT] is an affiliate of [REDACTED CONTENT], a multi-state community development corporation. Established in 1997, [REDACTED CONTENT] is a designated Community Development Financial Institution (CDFI). Its mission is to enhance the economic self-sufficiency and quality of life of individuals and communities through entrepreneurial training, technical assistance, access to financing for new and expanding businesses, and mortgage products for underserved borrowers.

[REDACTED CONTENT] and JPMorgan Chase have had a formal relationship for several years. JPMC has partnered with [REDACTED CONTENT] to provide technical assistance and business training to emerging and established small businesses in Buffalo-Erie County and Rochester-Monroe County. More recently and at the end of 2023, JPMorgan Chase provided [REDACTED CONTENT] with a three-year $250,000 grant for outreach, training and technical assistance to underserved communities and minorities in upstate NY, working alongside other CDFIs in the region ([REDACTED CONTENT], [REDACTED CONTENT] and [REDACTED CONTENT]) on a joint project called [REDACTED CONTENT].

GRCRC asks JPMC to make sure that funds, in the form of low-interest loans and/or grants, continue to be allocated to [REDACTED CONTENT] and other CDCs and CDFIs that are working towards providing capital to our community’s small businesses and mostly minority-owned clients.
[REDACTED CONTENT] helps individuals and families build financial wellness and peace of mind through financial education and counseling. Each year, [REDACTED CONTENT] helps more than 12,000 residents manage debt, improve their credit, increase their savings, and manage their money effectively. Nearly 80% of [REDACTED CONTENT] clients are considered low-to-moderate income (LMI) according to HUD standards and more than 45% are considered low income. [REDACTED CONTENT] received $480,693.46 in fair-share support from Chase Card Services between 2020 and 2023 where creditors, like Chase, pay [REDACTED CONTENT] a percentage of the payments that [REDACTED CONTENT] helps customers make towards Chase credit card debt.

JPMorgan Chase provided a $2,500 sponsorship to [REDACTED CONTENT] community event in 2021, has made scholarships available for staff development trainings, and has invited its team to participate in community listening sessions focused on the needs of LMI households and households of color.

However, JPMC has not provided regular financial support to [REDACTED CONTENT] in terms of an operating grant. Its program participants have not traditionally relied on Chase mortgage products for home ownership, opting instead to utilize local lending products tailored to the needs of the community. JPMC has extended an invitation to utilize its financial wellness curriculum to improve the financial capacity of [REDACTED CONTENT] participants but the organization is not aware of products available in the local market that address the needs shared at the community roundtable.

Empire Justice Center would like to thank JPMC for its $15,000 grant in August 2023 for general operating support.

Community Development Opportunities

GRCRC members share with us the needs in the Rochester community and initiatives, programs and needs of the member organizations. We then include these as opportunities in our comment letters as possible investment opportunities for the banks. We understand that each bank will not be able to invest in all these opportunities. At the least, we ask that JPMC consider these on-the-ground perspectives when making decisions about products, investments and contributions so it can more effectively address the needs of the Rochester community and support low-moderate income and BIPOC communities.

Structural Racial and Income Inequality in Upstate New York

We first want to frame the need for consumer protections in the big picture context of rising income inequality. Incomes of working families have not kept up with rising housing, education,
childcare and health costs. This has resulted in millions of Americans struggling to pay for basic necessities. As seen in a recent NYT Magazine article by Matt Desmond,\(^\text{17}\)

- Nationally, “Rent has more than doubled over the past two decades, rising much faster than renters’ incomes. Median rent rose from $483 in 2000 to $1,216 in 2021.”
- “From 2000 to 2022 in the average American city, the cost of fuel and utilities increased by 115 percent.”

Upstate New York had still not fully recovered from the financial crisis of 2008 when COVID-19 struck. Income inequality is exemplified in the post-industrial cities of upstate New York. The city of Rochester has the highest concentration of children living in poverty compared to cities of similar size in the United States. In 2019, Rochester came in dead last in a list of the country's 50 hottest job markets published by the Wall Street Journal.\(^\text{18}\)

New Yorkers are feeling the financial strain of record high debt burdens, especially in upstate areas where poverty rates are some of the worst in the nation. The poverty rates in upstate cities such as Rochester (57%), Syracuse (56%), and Buffalo (53%), despite best efforts, show no signs of decreasing in any meaningful amount.

Rural areas across upstate are also deeply affected by poverty. According to a study by Common Ground Health,\(^\text{19}\) the rural and urban areas of the Finger Lakes region of New York with the highest rates of poverty were also the areas with the lowest life-expectancies. Not only does financial insecurity cost New York billions of dollars per year, it contributes to a public health crisis that cannot be ignored.

In 2017, the New York Federal Reserve issued a report on the credit profile of city of Rochester residents. The 2017 report looked at data at the ZIP Code level in the city of Rochester. This report found that more than 50% of city of Rochester residents had subprime credit. In some ZIP Codes 50-75% of city residents had subprime credit. These ZIP Codes are majority nonwhite.\(^\text{20}\)

Most bank branches have left these neighborhoods. Working families making $15-25 an hour can’t pay all their essential bills on time. These families may also have monthly incomes that are volatile. They may not have paid sick leave or a guaranteed minimum number of hours. They

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may not be sure how much money they will have at the end of the month. Given the high cost of housing, childcare, education and health care, the minimum wage and/or volatile incomes leave families in a situation where one or more bills are left unpaid. An unexpected car repair or medical bill throws their monthly expenses into crisis. Earlier research done by the Federal Reserve documents that 40% of Americans don’t have $400 in emergency savings.

There is a structural mismatch between incomes and expenses. According to research from the Federal Reserve Board, the median Black family in the under 35 age group had only $600 in wealth, compared with $25,400 among young white families. This has a disparate impact on Black and Brown families, who have no intergenerational wealth, in how they access or rather fail to access credit.

Professor Lisa Servon documented the lives of working families who use check cashers and payday lenders. Her book “The Unbanking of America” shows that working families make very complicated choices about using a check cashier instead of their own bank.

Empire Justice Center used her research to look at the underbanked in Rochester, New York. Our 2018 report “Too Big to Fail” found similar patterns in Rochester. Those who choose a check cashier over their bank do so because their bank does not offer a product that fits into their lives.

In February 2024 the National Consumer Law Center released an updated issue brief: “Past Imperfect: How credit scores “bake in” and perpetuate past discrimination.” The issue brief documents: “In 2021, the median credit score from Vantage Score for Black consumers was 639, while for white consumers it was nearly 100 points higher at 730 and Asian consumers’ median was 752. Latino consumers were in between with a median score of 673.”

“But the disparity in wealth is even more stunning: the typical Black family has a median wealth of only about 15 percent ($44,900) of the typical white family ($285,000). The typical Latino family similarly has only about 20 percent of the wealth ($61,600) of the typical white family.”

Banks don’t serve the needs of such families. Bank products are designed for customers who have disposable income at the end of the month. When families don’t have enough money to pay for essentials, an unexpected decline in income or an emergency expense results in a subprime score. Families turn to predatory products to pay rent so they are not homeless, to pay the car loan so they can keep their job, or to buy groceries so they don’t go hungry.

22 https://www.lisaservon.com/
A 639-credit score means a Black family cannot qualify for a mortgage, given how mortgages are underwritten. As seen below, subprime auto loans further destroy credit. Subprime credit cards also make it hard to save or pay off debt. The wealth disparity means that Black families can’t turn to each other for an emergency loan. In this comment letter we describe mortgage loans, small dollar loans, and even auto products that build wealth rather than extract it. The NCLC issue brief also makes multiple recommendations to achieve that goal.

Banks have a choice on how they process payments--to maximize short term profit or to create long term sustainability for both the bank and the customer. Even when a customer’s bank book shows a balance, more and more banks have chosen the former, to clear deposits and charges so that the customer is hit by an overdraft fee.25

In January 2024 the Consumer Financial Protection Bureau (CFPB) issued new overdraft rules. The rules will reduce the amount of overdraft fees that banks can charge. As seen in the press release by Americans for Financial Reform on the proposed regulations,

- “Overdraft fees take a lot of money out of people’s pockets; it’s about $9 billion per year. Megabanks are big beneficiaries.
- “The most vulnerable consumers are the ones that pay. A consumer is three times more likely to pay overdrafts if they make less than $65k than if they make more than $175k.
- “By contrast, banks are incredibly profitable. On Friday, JPMorgan reported the largest profit by an American bank in history – $49 billion last year – thanks in part to billions in overdraft revenue.”26

We look forward to the final overdraft rule that will limit the ability of banks to extract wealth from the lowest income consumers.

There is no shortage of predatory lenders who know how to make enormous profits by selling high-cost products to low-income borrowers. These products are set up for the consumer to fail and for the investors behind the products to make money. The interest rates/fees are abusive and designed to be vastly profitable with no relation to the risk taken by the lenders. Some loans are bundled into investment vehicles. The largest banks fund the companies that create and market these products.

Some federal and state regulators are finally starting to look at the systemic risk posed by these practices. We need to change the laws to stop these practices that result in enormous profits for corporations, and financial hardship or worse in the life of working families.

Consumer advocates have been raising these issues for decades. Now academics and regulators are beginning to appreciate the societal costs of poverty. Being repeatedly evicted and changing schools has enormous consequences on a family’s emotional and physical health. We are finally starting to move from a mindset that blames poor people for their poverty.

The CRA was passed in 1977 to address the decades of redlining that had been happening in our communities. While the law says banks should serve the entire community in which they do business, including low- and moderate- income (LMI) communities, redlining mainly happened in, and continues to happen in and impact, Black and brown communities. This is why banks must make decisions about their CRA-related lending, investments, and grants through the lens of racial equity, as well as economic equity.

As in the rest of the nation, there is much work to be done in New York to come to terms with our history and to address structural racial and income inequality. We need to look at the laws and economic policies that perpetuate structural racism and keep communities segregated. We also need structural change to ensure that jobs pay a living wage. New York State must develop and foster an environment where affordable housing, health care, and quality childcare are a reality for all people.

At the institutional level, banks must shift policies, practices, and culture to align with racial equity, anti-oppression, and cultural humility. This includes work to:

- Become welcoming for all people particularly those who have been historically, and continue to be, marginalized.
- Assure employees, from the CEO down to staff underwriting loans, and those working with the public, are doing internal and interpersonal work (including implicit bias training) to address internalized racism and other forms of oppression.
- Find ways to go into the community to create ease/support for BIPOC and Black and brown-owned businesses.

A Brookings’ paper shares how private sector leaders can significantly move the needle towards racial equity and an equitable economy via a 3-part framework:27

- Adopt internal changes within individual companies to promote diversity, equity, and inclusion.
- Act collectively with other CEOs to make regionwide progress on racial equity and equitable growth, including improving key regional performance indicators.

• Encourage business-led civic organizations to adopt their own changes toward equity and inclusive economic growth.

The paper also includes links to data metrics to measure progress at the MSA level. We urge JPMC’s leaders to work with other local private sector leaders and groups from the [REDACTED CONTENT] to implement this or a similar framework in the Rochester community.

In addition to these suggestions, JPMC can take other constructive actions to support BIPOC people, businesses, and communities. JPMC can:

• Start tracking how much of its CRA related activities and support (lending, philanthropy, and community development loans and investments) goes to BIPOC people, businesses and organizations led by people of color, and BIPOC communities, and create specific goals to increase these levels of support over time.

• Partner with and/or support BIPOC-led organizations that JPMC has not worked with in the past, including through investments, grants, and hiring local BIPOC-led vendors for supplies and services.

• Learn about the history of redlining in the Rochester area28 and work with the Black and Brown residents of the impacted neighborhoods to address the vestiges of redlining and to build wealth and equity in ways that do not push-out lower income residents.

Research from the University of Houston highlights the intersections of race and advertising. The results underscore the power of advertising and access on behavior.29 We hope JPMC will find this research helpful as the bank continues its work in Black and Brown communities as well as its internal work in addressing the legacy of racism in this country. We look forward to hearing how the bank is progressing in this critical work.

Bank Branches

Like most GRCRC members, the [REDACTED CONTENT] is very concerned about banking deserts, which impact our community’s ability to open bank accounts and access lending or financial education services. In addition to Chase, other banks have closed branches in

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28 For an excellent overview of the local history see: Shane Wiegand, “Racist Policy and Resistance in Rochester,” at: https://www.youtube.com/watch?v=1ivgX0AXrPs.
Rochester, especially in neighborhoods already impacted by a legacy of redlining, lack of generational wealth and little access to transportation to branches in other neighborhoods.

[REDACTED CONTENT] clients repeatedly report use of Chime, a neo-bank offering financial services to consumers via a mobile app, rather than traditional banking. Clients turn to mobile banking alternatives to traditional banking due to limited accessibility to banks in the community and convenience. With Chime, consumers may use any ATM at the expense of a small fee. Another issue that [REDACTED CONTENT] has observed is a lack of financial literacy and credit building education in the community.

Specifically, the [REDACTED CONTENT] and its [REDACTED CONTENT] are disturbed by the closure of the Chase West End Branch in 2022. According to the SW Street Liaison Office,

Chase, and its predecessor Lincoln-Alliance Bank across the street at 886 West Main St., have met the banking needs for the Bull’s Head area since 1922 – one hundred years!

Closing the Chase branch office at 36 Genesse St. at Bull’s Head in October 2022 left our community with no full-service physical bank office. Although the closure was required to enable the City of Rochester’s Bull’s Head Revitalization Project, the community had hoped that the bank would relocate temporarily to nearby vacant office space. It did not relocate.

This branch closure has been a huge loss for our community in which 28% of the dwelling units have no vehicle, and over 400 business entities line the surrounding commercial corridors. Further, Chase has given no indication that they would return to the Bull’s Head area after the planned revitalization.

JPMC also closed its Chase University of Rochester River Campus Branch, which was not accessible to the 19th Ward, even though it looked close on a map. These branch closures are in addition to Chase’s 2016 closure of its Portland-Clifford Branch, located in a low-moderate income majority BIPOC neighborhood.

We understand that the **City of Rochester** is very interested in discussing a new branch with JPMC. This would replace the Chase branch that was closed to enable the demolition of Bull’s Head Plaza. The City of Rochester is requesting that someone from JPMC reach out to them to discuss the reopening of a Chase branch in Bulls Head especially since the revitalization at Bull's
Head is now picking up speed. We will reach out to the bank to make the connection. We urge Chase to follow up with the City as soon as possible.

To address the issues of banking deserts and use of neo-banking apps, JPMC could at least increase the number of Chase branches along Rochester’s bus lines and provide funding to community agencies that provide financial education and programming to underserved populations.

Abusive Auto Lending

One prevalent consequence of lack of access to sound credit and banking services is abusive auto lending. In the Rochester MSA and surrounding rural counties of the Finger Lakes and Western New York, where almost no viable public transportation options exist, cars are essential for getting to work, medical appointments, and accessing other basic services.

Without access to auto loans from banks, subprime auto lenders and “Buy Here Pay here” dealers are prevalent. These predatory dealers and lenders sell people cars with loan contracts that are designed to fail.

At $1.44 trillion, auto debt is at an historic high.

Until recently, there was limited data/information on abusive auto lending. Research by Consumer Reports published in December 2021 sheds some light on the abuses. Consumer Reports purchased almost a million loan files and documented the mismatch between credit scores and interest rates. In addition, many of the abusive auto lending practices are described at a panel discussion that included elected officials from Connecticut, as well as Ruhi Maker Esq. and Chuck Bell (Consumer Reports) from New York.

[REDACTED CONTENT] is the primary free legal services provider in 13 of the 14 counties in the Rochester MSA and the rural counties in the Finger Lakes. [REDACTED CONTENT] turns away hundreds of callers each year seeking help with consumer legal problems because of the sheer volume of people needing assistance. Staff members see hidden fees for the dealership, and costly, yet worthless, extended warranties added to the contracts without the consumer’s knowledge. It is not uncommon for a consumer to buy a used car with over 100,000 miles on it that was advertised at a number around 5,000 miles. That consumer will end up with a loan that will cost them more than three times that amount by the time they are done making payments.

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33 https://drive.google.com/file/d/15kRAB6qV94VD3_RPYB_mzbvwnMWceowx/view
The pattern [REDACTED CONTENT] has observed is that most consumers are not even made aware of the terms of the loan at the time they purchase the car. The majority of documents are signed on a computer, by clicking a button that is often controlled by the salesperson or signed on paper with the salesperson’s hand hiding pertinent information. Frequently consumers leave the lot with their car but not their contract. When they finally do receive the contract, they are shocked to learn that the car they purchased will cost them more than twice what they were told by the dealer. Because there is no cooling-off period for car sales, consumers are left with no recourse to return the car after learning it is unaffordable, and dealers will often direct consumers to the company that indirectly financed their loan, even though the consumers have only ever interacted with the dealer. All of this results in extremely high default rates--25% for subprime auto loans made at “Buy Here Pay Here” dealerships, compared to only 1% default rates for low-interest auto loans made by traditional banks. When individuals default on their auto loans, the lender will repossess the vehicle and auction it off for a fraction of the fair market value. In most instances, this leaves a large deficiency balance on the loan that the lenders will pursue in the courts by filing lawsuits against the consumers, again increasing what the loan costs by adding attorney’s fees, court costs, and post-judgement interest. Without access to legal representation, many of these lawsuits result in default judgments against the consumers, even when there are legal defenses. Consumers will then end up paying for these cars for years after they surrendered them and for thousands of dollars more than they were ever worth. This results in a cycle of subprime credit that is almost impossible to break.

Just how predatory lenders do this is laid out in the complaint filed by the New York Attorney General and the CFPB against Credit Acceptance Corporation (CAC) in January 2023.34 The complaint alleges that CAC advertised its loans as fixing credit. They were in fact designed to fail, end in repossession, and extract money from borrowers with impaired credit via inflated payments, repossessions, and judgments. CAC used a proprietary algorithm to pick the price, loan terms, and useless add-ons to maximize profit. This lawsuit could impact 1.9 million borrowers.

Considering the abuses outlined here and in the CAC press release and complaint, we urge JPMorgan Chase to design a responsible auto lending product, or products, for used autos and borrowers with subprime credit and that works in both direct and indirect channels.

JPMC Bank does direct and indirect auto lending. On the bank’s website\(^3^5\) it allows for 620-credit score.\(^3^6\) Interest rates range from 16% to as high as 25% depending on amount, the length of the loan, and the age of the car. With respect to its indirect auto lending, JPMC should work to strengthen its oversight to ensure that auto dealers are putting borrowers into responsible, affordable loans without unaffordable, unneeded add-ons.

JP Morgan Chase can also financially support nonprofit law firms like [REDACTED CONTENT] that are representing consumers who are trapped in unaffordable, predatory auto loans.

Additionally, there are still many credit-challenged LMI consumers who have no other option than a very high-interest, high-payment auto loan to address their transportation needs. By investing in affordable auto loan programs like [REDACTED CONTENT], consumers can avoid the inherent challenges that arise from expensive loans such as upside-down balances and loans that outlast vehicles. [REDACTED CONTENT] provides counseling and education to help LMI residents who need transportation for work purposes to qualify for auto loans with local lenders. In its first full year of operation, the program educated more than 500 residents about savvy car buying and helped 25 LMI borrowers with challenged credit to get approved for auto loans.

Access to Affordable Products for the Un- and Under-Banked

As seen in the NY Times article by Matthew Desmond:\(^3^7\)

“All year: almost $11 billion in overdraft fees, $1.6 billion in check-cashing fees and up to $8.2 billion in payday-loan fees. That’s more than $55 million in fees collected predominantly from low-income Americans each day — not even counting the annual revenue collected by pawnshops and title loan services and rent-to-own schemes.”

“According to the F.D.I.C., one in 19 U.S. households had no bank account in 2019, amounting to more than seven million families. Compared with white families, Black and Hispanic families were nearly five times as likely to lack a bank account. Where there is exclusion, there is exploitation. Unbanked Americans have created a market, and thousands of check-cashing outlets now serve that market….In 2020, Americans spent $1.6 billion just to cash checks.”

“Roughly a third of all payday loans are now issued online, and almost half of borrowers who have taken out online loans have had lenders overdraw their bank accounts. The average borrower stays indebted for five months, paying $520 in fees to borrow $375.”

\(^3^5\) https://autofinance.chase.com/auto-finance/auto-loans#:~:text=A%20down%20payment%20isn't,to%20your%20dealership%20to%20apply
\(^3^6\) Using the Chase payment calculator, we tried different financing amounts, credit scores, and autos—new or used here: https://autopreferred.chase.com/garage/auto-loan-calculator?offercode=WDXDUXX30
\(^3^7\) https://www.nytimes.com/2023/03/09/magazine/poverty-by-america-matthew-desmond.html
While brick and mortar payday lending is illegal in New York, online payday lending is used by many NY consumers because they don’t know that payday lending is illegal in NYS and/or they need money for an emergency.

Banks can develop products and practices to address this wealth extraction from low-moderate income consumers. The [REDACTED CONTENT] Bank On initiative works with financial institutions to develop safe, low-cost transactional accounts that meet the Bank On National Account Standards.³⁸

The Chase Secure Banking account is JPMC’s account that meets the Bank On National Account Standards.³⁹ The account includes, among other features, no minimum deposit to open, a nonwaivable $4.95 monthly service fee, no overdraft fees, a debit card, free use of Chase ATMs, and free money orders and cashier’s checks.

One problematic feature is that customers can send money using Zelle after enrolling in the service. Consumers using Zelle are still being harmed by imposter scams, and Zelle does not have clear reimbursement policies.⁴⁰ While Chase states: “Neither Chase nor Zelle® offers a protection program for any authorized payments made with Zelle®, or provide coverage for non-received, damaged, or not-as-described goods and services you purchase using Zelle®, so you might not be able to get your money back once you send it,”⁴¹ GRCRC urges JPMC to work with Zelle to develop clear reimbursement policies and better protection against imposter scams.

Banks with Bank On accounts often need to better market these accounts. GRCRC is glad to see that the Chase Secure Banking Account shows up easily on the bank’s website,⁴² is included on the checking account comparison page, and that the Bank On certification is included on the account page.

Bank members of the Bank On coalition can use Public Service Announcements (PSAs) in the media markets that serve low-moderate income and Black and Brown customers. These PSAs should be in Spanish and in the languages spoken by New Americans as described below. Social media is also a good tool to reach underserved customers. Banks can also conduct their own webinars at not-for-profits that serve lower income consumers and work with not-for-profits to ensure their Bank On accounts become well known. GRCRC looks forward to hearing how JPMC is taking advantage of these Bank On resources or using other avenues to market its Chase Secure Banking account to lower income and communities of color.

³⁹ https://personal.chase.com/personal/secure-banking
⁴¹ Footnote 7 at: https://personal.chase.com/personal/secure-banking.
⁴² https://personal.chase.com/personal/checking
According to a chart by the CFPB, in 2021 JPMC Bank made $1.135 billion in overdraft fees, putting it in 2nd place among the top 75 reporters of overdraft/NSF fee revenue. JPMC’s overdraft fee is $34, with a maximum of 3 fees per business day (up to $102). These fees do not apply to the bank’s Chase Secure Banking account as it does not allow overdrafts. The bank gives customers the option to bring their account balance back to a positive balance by the end of the next business day after the previous night’s transaction processing to avoid the overdraft charge. There are other exceptions, as well. Overall, it looks like Chase still has some of the highest overdraft/NSF fees among the nation’s banks. GRCRC urges the OCC examiners to take these high fees and their well-documented harms to consumers into account in the bank’s performance evaluation.

Recognizing that emergencies will arise, we encourage JPMC to develop a Chase small dollar loan for $500 - $1,000 that is low fee and is repaid in 4-5 payments. We could not find any information on such a personal loan on the Chase website, while we found information on loans for its “Private Clients” and for customers with a Chase credit card (My Chase Loan).

Finally, over the past few years, [REDACTED CONTENT] has found that many clients need ongoing, one-on-one support to make real improvements to crucial areas of their personal finances such as their savings and credit. When counselors support clients with longer-term coaching, they experience increased outcomes in debt repayment, savings, and credit score increases. For example, last year the [REDACTED CONTENT] served 919 clients through long-term coaching of whom 295 achieved an outcome such as reducing delinquent accounts, reducing non-mortgage debt, and increased credit score. JPMC should consider financially supporting this program.

Other Community Opportunities

Improving Housing Affordability for Renters and Owners

On January 30th Empire Justice Center submitted comments to the City of Rochester on its proposed draft zoning code. The comments describe the housing crisis and recommend increased density of both affordable rental and homeowner units.

Several sources show how housing prices have increased in the Rochester NY MSA.

43 https://www.consumerfinance.gov/data-research/research-reports/vast-majority-of-nsf-fees-have-been-eliminated-saving-consumers-nearly-2-billion-annually/##ref1
44 See p. 13 of: https://www.chase.com/apps/services/pdfreader.ir3bX5+1BmnVLAebCaB6HLcw0CnSihi2PeiQYAVMKN9ZQwaNYLntSYCiTyp1t1ze6Vj8OEes+sh7q86FiFaDYjYUXA_iWOIwK0Jh2Vjw8Nt3mSOYQWrUvQ==.pdf
• Based on anecdotal evidence, climate refugees from the Southwest and West are relocating to Rochester and making cash purchases.48
• A Rochester suburb has been ranked as the hottest zip code in the US with respect to home sales.49
• According to research by the Greater Rochester Association of Realtors (GRAR), the median sales price of a home in the Greater Rochester market rose to $200,000, more than an 11% increase over 2021 and almost 43% higher than in 2018.50
• Homes are going over the asking price, a recent first-time homebuyer shared in a January 2023 news story. “I was bidding up to $30,000 over the asking price,” Clark explained. “What I found out was that was the bottom of a pile of 18 offers and the final sale price went for $70,000 over and it was an increase of $100,000 home value in four years.”51
• A quick March 2023 search of homes in Rochester between $125,000 and $160,000 on Zillow showed only a handful of homes for sale.

There are over 55,000 rent burdened housing units in Monroe County, of which almost 30,000 are in the city of Rochester.52 In a 2021 report, [REDACTED CONTENT] found that over 2,000 city of Rochester landlords are marginal or predatory landlords (some out of state/country) and that they own 50% of the rental housing units in the city.53 These landlords extract high rent from tenants who have limited choices due to the lack of affordable housing. Meanwhile, they do little to repair and maintain the properties.

JPMC can increase housing affordability by supporting some of the rural housing-related programs described below, as well as increasing its support of those offered by [REDACTED CONTENT] (as described above). Specifically, JPMC can provide deep subsidies/investments into [REDACTED CONTENT] [REDACTED CONTENT] and [REDACTED CONTENT] programs to make these program’s rehabilitated properties affordable to lower income families. These properties are becoming increasingly unaffordable for families other than those near 80% of the area’s median income due to higher rehabilitation costs, the post-COVID increases in housing prices in the Rochester area, and higher interest rates.

Also, refer to our section on Considerations for Special Purpose Credit Programs in our conclusion to the HMDA Lending section above for how Chase can improve the affordability of mortgage credit.

48 Bank meeting with mortgage paralegal, March 2023.
50 https://rochesterbeacon.com/2023/03/09/the-road-to-rent-stability/
51 https://www.rochesterfirst.com/economy/the-new-obstacles-making-rochesters-housing-market-more-expensive/
Needs of LMI Communities in Rural Areas

We ask that Chase Bank increase its support for programs that work with low-income households, particularly in rural communities, who are seeking to buy a home or make other essential large purchases, such as a car, but have a low credit rating or limited credit history.

For example, in rural Western New York, [REDACTED CONTENT] can identify many ways in which JPMorgan Chase can meet the financial and investment needs of the LMI communities it serves. [REDACTED CONTENT] is a long-standing legal services provider in the counties of Steuben, Chemung, Tompkins, Allegany, Cattaraugus, Chautauqua, Livingston, Monroe, Ontario, Schuyler, Seneca, Steuben, Tioga, Wayne, and Yates.

While a majority of JPMC’s Chase branches are located in the urban and suburban areas of Monroe County, Chase does have branches in more rural-oriented areas of [REDACTED CONTENT] service area, such as Ontario, Wayne, and Tompkins counties. Even the branches located in cities, such as the Chase branch in Ithaca, provide critical financial services and lending opportunities to surrounding rural areas where bank branches and available financial services are scarce.

[REDACTED CONTENT], a legal fellow employed at [REDACTED CONTENT] to work regionally on housing, consumer, and community reinvestment issues covering [REDACTED CONTENT] more rural-oriented service area, points out that:

“Bank closures, disinvestment, and limited access to safe credit and stable financial services deeply impacts LMI communities in [REDACTED CONTENT] service area. While regional and small banks are struggling, [REDACTED CONTENT] says it is essential that large banks operating in its rural service area step up and meet the credit, financial, and investment needs of the region. JPMorgan Chase, along with other major financial institutions, can do much more to meet these deep financial and investment needs.”

According to [REDACTED CONTENT]:

Mortgages to buy homes in our rural area are relatively affordable compared to rents. In 2022, the median residential sales price in Allegany County, as listed by the NYS Department of Taxation and Finance, was $93,250 – one of the lowest levels of any county in New York state. For Steuben County, the average home sales price was $135,000. For the counties of Ontario and Wayne, where JPMC has branches, the averages were $260,000 and $181,000 respectively. All of these county averages are well
below the state average, which was $305,000 in 2021 (excluding NYC) but is now estimated to be even higher.\textsuperscript{54}

However, most of our legal services clients have low credit ratings, even though many have steady income from employment or social security benefits and favorable recent payment records. in any of the counties in New York State. Despite the relatively low monthly payments required to amortize a mortgage, our clients and other consumers like them are trapped in rental housing.

Many households, unable to get financing from banks, enter into one-sided, high interest and risky land contracts or “rent-to-own” agreements. Some of the finance companies attract purchasers based on inflated internet advertising. Other finance companies market severely substandard homes typically bought at tax or mortgage foreclosure auctions. Many of the housing cases handled by our office involve defending clients in these oppressive arrangements or assisting them with the very difficult task of obtaining a deed for ownership, even when the buyers have made all their payments. Other cases involve title issues, such as the failure of the finance company or seller to pay property taxes, or the seller has failed to maintain their own mortgage payments. In a land contract or “rent-to-own” transaction, title problems of the seller can result in the loss of the buyer’s investment in the home through a foreclosure action brought by a third party.

[REDACTED CONTENT] and other attorneys and advocates at [REDACTED CONTENT] propose the following ways that JPMC can reinvest in rural Western NY and help lead the way in combating some of its LMI client communities’ most pervasive issues.

1. Expand small dollar mortgage lending and FHA, VA, USDA lending.
2. Adopt more inclusive methods of evaluating an applicant’s credit worthiness, such as consideration of positive rental history and utility payment.
3. Increase investments in credit/financial counseling coupled with credit-building programs.
4. Provide greater access to low-interest auto loans but increase oversight for auto dealers when doing indirect auto lending.
5. Provide community development investments to expand affordable housing for both rehabilitating existing affordable housing and developing new affordable housing.
6. Expand refinancing eligibility for LMI communities, especially to buyout LMI borrowers from risky land contracts and rent-to-own agreements.

7. Prioritizing keeping bank branches open or arranging to sell/donate branches to CDFIs well-positioned to maintain financial services to LMI communities (who are acutely vulnerable to branch closures).

[REDACTED CONTENT] welcomes the opportunity to meet with JPMorgan Chase to discuss the above proposals and other ways JPMC can expand its community reinvestment activities in line with the needs of LMI communities in rural Western New York.

GRCRC urges JPMorgan Chase to work with [REDACTED CONTENT] to see how the bank can increase access to homeownership in the rural areas of NYS.

Language Access

Over 5.7 million people living in New York speak a language other than English. Of these, 2.5 million speak English less than well (i.e., they have Limited English Proficiency (“LEP”)). Monroe County has a population of 741,770, of which 103,800 or 14% speak a language other than English at home (US Census Population Estimate, 2015-2019). This includes many Spanish-speaking American citizens who relocated from Puerto Rico to Monroe County after Hurricane Maria in 2017. Rochester also has a significant population of refugees who speak Arabic, Nepali, Somali, and Swahili. Rochester has the largest concentration of Deaf and hard-of-hearing residents in the country.

Since over 103,000 Monroe County residents have language barriers, the need for language access for bank customers in our community is great, including the need for in-language access to products such as mortgages and consumer loans, as well as language access for consumers with mortgage delinquencies and facing foreclosure who need forbearances or loan modifications.55

“Limited English proficient” or “LEP” is the term used by the federal government, most states, and local school districts to identify those individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. 56 JPMC has information in Spanish on its Chase website.57 Our Spanish-speaking colleagues looked at the details and found that:

- Not all information, even on the home page, is translated when switched to Spanish on the website. The banners and ads remain in English.

57 https://www.chase.com/espanol.
• Any icon that is connected to business and credit cards is not translated into any language. Nor is the information on how to connect to a JPMorgan Advisor to make investments translated into Spanish.
• All the information under Educación y metas (Education and Goals) is in English.
• On the bottom, the menu is translated into Spanish, but when clicking on many Spanish links, a message says they are being taken to a page that will most likely not be translated. The page is within Chase products.
• The section for Chase customers to make a payment asks for a lost debit card that is translated into Spanish.
• When asked in Spanish to take a survey, the survey pops up in English.

Not having any of the business products or credit card products translated shows that the final decision on what is translated on the website is not made with an equitable lens. Those making the decisions assume that those with language barriers are not business owners. This is despite the fact that nationally, “Though Hispanic owners often have difficulty getting financing, in the decade from 2012 to 2022, their small businesses multiplied by 44 percent (more than 10 times the rate of other similarly sized businesses).”

As of the date of this letter, FHFA and the CFPB have developed some guidance on the obligations of financial institutions to serve LEP consumers. **We urge the regulators at the Federal Reserve, the OCC, and the CFPB to develop detailed guidance so that the majority of the LEP population is equitably served when accessing financial products and services.**

**Empire Justice Center** has advocated for language access in mortgage originations for over a decade. A recent development will require mortgage lenders Fannie Mae and Freddie Mac to collect information on borrowers’ preferred language, as well as any housing counseling services they’ve used. This information will enable lenders to make as much information as possible about their mortgages in the language the borrower understands best. The press release [here](https://www.nytimes.com/2024/03/18/opinion/hispanic-immigrants-economic-progress.html) has more information. Equifax is the first credit report agency to provide credit reports in Spanish ([Equifax Spanish Credit Report](https://www.cnbc.com/2021/09/29/spanish-language-credit-reports-a-big-win-for-financial-empowerment-.html)). This will empower Spanish-speaking consumers to take hold of their finances and not depend on a third party to translate the information.

**Supporting CDFI Credit Unions**

[REDACTED CONTENT] is a CDFI-Certified Credit Union serving primarily low-income people and people of color in Rochester, NY, one of the poorest cities in the country. [REDACTED CONTENT] has been rapidly growing to help more community members avoid predatory lending and build wealth. The credit union specializes in offering responsible and affordable car loans to

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underserved individuals and helping people buy their first homes. [REDACTED CONTENT] is looking for $2 million in non-member deposits at 0% interest rate to support its lending in these communities. Such investments of 5 years or longer will allow the credit union to increase its affordable auto lending and to do interest rate buy-downs on its mortgage loans for first-time home buyers. GRCRC urges JPMC to make significant patient investments in CDFIs like [REDACTED CONTENT].

Climate Change and a Just Transition

In 2019, NYS adopted the country’s most ambitious climate targets--to have 100 percent carbon free electricity by 2040 and have economy-wide, net-zero carbon emissions by 2050. We need massive investments to make this happen, and we need to make sure it is a just transition, where, at a minimum, impoverished communities and communities of color are not disproportionately burdened or harmed.

The Climate Solutions Accelerator of the Genesee-Finger Lakes Region has ideas for how banks can evaluate their businesses through the lens of climate change, elect to move their businesses towards climate-friendly solutions, provide support for organizations that are doing this work in their footprint, and support lower income and BIPOC communities in the transition to net-zero greenhouse gas emissions. JPMC can:

- Provide low-cost home improvement or refinance loans and other innovative financing products to people of color and low-moderate income households and tenant occupied buildings to make home energy efficiency projects more affordable and feasible. This will allow owners to weatherize, get heat pumps and heat pump hot water heaters, put in electric car chargers, and install solar panels, which will reduce energy costs, decrease families’ carbon footprints and improve indoor air quality.
- Provide affordable financing for small businesses, particularly micro-businesses and Black and brown-owned businesses, that want to improve their energy efficiency and reduce their reliance on fossil fuels.
- Create community development financing goals and products to support projects that provide substantive opportunities for low-moderate income communities to benefit from the transition to renewable energy and reduce their use of fossil fuels, e.g. community solar, district geothermal.
- Invest in renewable energy, including geothermal, solar, wind, battery storage and other building energy efficiency investments, along with clean energy workforce development to support the growing demand of this transition.
- Require or strongly encourage borrowers to include energy upgrades in their renovation projects, especially for multifamily buildings that require major renovations.
• Include information about energy upgrades (and corresponding energy bill savings) and/or referrals to relevant energy programs (e.g., AMPED and other NYSERDA-funded Regional Clean Energy Hubs) as part of homebuyer/financial education programs.

• Provide philanthropic support to nonprofit organizations that are working to address environmental justice/climate justice and climate change.

• Reduce the bank’s own carbon footprint.

GRCRC urges JPMC to connect with these organizations to hear more about the important work they are doing to improve the Rochester community and to seriously consider their recommendations to advance the work.

CONCLUSION

Economic disparities and racial segregation in the Rochester community persist. Rochester is the 14th most segregated metro area in the US.60 We have much work and introspection ahead of us to fully understand how structural racism and economic inequality continue to divide our communities and disproportionately harm Black and Brown communities, while ultimately harming us all.61 Like all financial institutions in this country, JPMC is part of and has benefitted from these systems.62

The current economic lay of the land, particularly around inflation, high interest rates, and the lack of affordable rental units and homes for first-time homebuyers means we need creative investments, programs, and products to make owner- and renter-housing more affordable and to increase support for those most impacted by today’s economic situation—Black and Brown low-moderate-income first-time home buyers and small business owners. Rochester has many initiatives and organizations to increase the supply of housing, to support lower income consumers to move closer to homeownership, and to provide technical assistance and financing for small businesses, several of which are described in this letter.

JPMC has made some progress in supporting historically marginalized communities. While its overall mortgage lending declined over the exam period, its lending to Black and Brown borrowers and in communities of color increased. The bank is supporting lower income customers with its Bank On Certified Chase Secure Banking Account. In addition, JPMC has been the lead lender for a number of years on [REDACTED CONTENT] and [REDACTED CONTENT] financing.

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62 For more on how the financial system has benefitted from structural racism and other forms of oppression, see: Take on Wall Street, “To What Extent Was Our Economy Designed to Be Fair?” at: https://isoureconomyfair.org/.
facility. In fact, almost 51% of the bank’s reinvestment dollars is in community development loans.

JPMC can do more to increase its LMI neighborhood small business lending through term loans and/or business lines of credit. The bank can also work with local developers of affordable housing to invest in more projects like Alta Vista and invest in our local CDFIs to help meet the goal we are seeking of an additional $100 million in reinvestments. JPMC can also increase its philanthropic support of organizations here in Rochester who are helping consumers build credit, buy reliable used cars with responsible loans, and become homeowners. Finally, the bank can connect these organizations to the responsible mortgage, auto loan, and transaction products the bank already has, so consumers can more easily access them.

GRCRC and its member organizations look forward to talking with JPMC about how to best meet the needs of communities harmed by structural racism, economic inequality, and the climate crisis in ways that are compatible with safe and sound business practices.

Sincerely,

[REDACTED CONTENT] [REDACTED CONTENT]
Senior Attorney Researcher/Policy Analyst

CC:
[REDACTED CONTENT], JPMC
[REDACTED CONTENT], JPMC
[REDACTED CONTENT], OCC
[REDACTED CONTENT], OCC
### Table 1: Offices and Deposits of all FDIC-Insured Institutions

**Deposit Market Share Report**

**Deposits as of: June 30, 2023**

<table>
<thead>
<tr>
<th>Rank</th>
<th>Institution Name</th>
<th>CERT (Hqtrd)</th>
<th>State</th>
<th>Bank Class</th>
<th>State/ Federal</th>
<th>No. of Offices</th>
<th>Deposits $000</th>
<th>Market Share Deposits %</th>
<th>US Share %</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Manufacturers and Traders Trust Company</td>
<td>588 NY</td>
<td>SM</td>
<td>State</td>
<td>1,006</td>
<td>161,266,058</td>
<td>29</td>
<td>3,986,404</td>
<td>16.84</td>
</tr>
<tr>
<td>2</td>
<td>The Canandaigua National Bank and Trust Company</td>
<td>6985 NY</td>
<td>N</td>
<td>Federal</td>
<td>0</td>
<td>0</td>
<td>26</td>
<td>3,603,003</td>
<td>15.22</td>
</tr>
<tr>
<td>3</td>
<td>JPMorgan Chase Bank, National Association</td>
<td>628 OH</td>
<td>N</td>
<td>Federal</td>
<td>4,852</td>
<td>2,064,610,783</td>
<td>23</td>
<td>3,431,217</td>
<td>14.49</td>
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<tr>
<td>4</td>
<td>Keybank National Association</td>
<td>17534 OH</td>
<td>N</td>
<td>Federal</td>
<td>958</td>
<td>145,164,174</td>
<td>27</td>
<td>3,020,047</td>
<td>12.76</td>
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<tr>
<td>5</td>
<td>Bank of America, National Association</td>
<td>3510 NC</td>
<td>N</td>
<td>Federal</td>
<td>3,802</td>
<td>1,877,299,426</td>
<td>23</td>
<td>1,861,229</td>
<td>7.86</td>
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<tr>
<td>6</td>
<td>Citizens Bank, National Association</td>
<td>57957 RI</td>
<td>N</td>
<td>Federal</td>
<td>1,071</td>
<td>178,947,971</td>
<td>22</td>
<td>1,766,195</td>
<td>7.46</td>
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<tr>
<td>7</td>
<td>The Lyons National Bank</td>
<td>7151 NY</td>
<td>N</td>
<td>Federal</td>
<td>4</td>
<td>253,530</td>
<td>12</td>
<td>1,465,643</td>
<td>6.19</td>
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<tr>
<td>8</td>
<td>Five Star Bank</td>
<td>659 NY</td>
<td>SM</td>
<td>State</td>
<td>28</td>
<td>3,726,569</td>
<td>21</td>
<td>1,338,825</td>
<td>5.66</td>
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<tr>
<td>9</td>
<td>Community Bank, National Association</td>
<td>6989 NY</td>
<td>N</td>
<td>Federal</td>
<td>197</td>
<td>12,147,902</td>
<td>15</td>
<td>933,099</td>
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<td>10</td>
<td>Genesee Regional Bank</td>
<td>26333 NY</td>
<td>NM</td>
<td>State</td>
<td>0</td>
<td>0</td>
<td>3</td>
<td>823,371</td>
<td>3.48</td>
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<tr>
<td>11</td>
<td>Tompkins Community Bank</td>
<td>609 NY</td>
<td>NM</td>
<td>State</td>
<td>57</td>
<td>5,792,703</td>
<td>8</td>
<td>710,346</td>
<td>3.00</td>
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<td>12</td>
<td>The Upstate National Bank</td>
<td>13748 NY</td>
<td>N</td>
<td>Federal</td>
<td>2</td>
<td>25,726</td>
<td>1</td>
<td>185,683</td>
<td>0.78</td>
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<tr>
<td>13</td>
<td>Wayne Bank</td>
<td>698 PA</td>
<td>NM</td>
<td>State</td>
<td>27</td>
<td>1,573,282</td>
<td>2</td>
<td>159,722</td>
<td>0.67</td>
</tr>
<tr>
<td>14</td>
<td>Evans Bank, National Association</td>
<td>6947 NY</td>
<td>N</td>
<td>Federal</td>
<td>16</td>
<td>1,639,810</td>
<td>4</td>
<td>150,182</td>
<td>0.63</td>
</tr>
<tr>
<td>15</td>
<td>Generations Bank</td>
<td>16040 NY</td>
<td>SB</td>
<td>Federal</td>
<td>5</td>
<td>228,614</td>
<td>4</td>
<td>108,132</td>
<td>0.46</td>
</tr>
<tr>
<td>16</td>
<td>Northwest Bank</td>
<td>28178 PA</td>
<td>SB</td>
<td>State</td>
<td>141</td>
<td>11,966,579</td>
<td>2</td>
<td>77,035</td>
<td>0.33</td>
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<tr>
<td>17</td>
<td>Savannah Bank National Association</td>
<td>14619 NY</td>
<td>N</td>
<td>Federal</td>
<td>4</td>
<td>121,697</td>
<td>1</td>
<td>44,405</td>
<td>0.19</td>
</tr>
<tr>
<td>18</td>
<td>Woodforest National Bank</td>
<td>23220 TX</td>
<td>N</td>
<td>Federal</td>
<td>772</td>
<td>7,961,435</td>
<td>3</td>
<td>7,287</td>
<td>0.03</td>
</tr>
</tbody>
</table>

**Selected Market**

**Metropolitan Statistical Area(s):**

ROCHESTER, NY

**Number of Institutions in the Market:** 18

**TOTALS:** 12,942 4,472,726,259 212 23,671,825 100
Table 2: JPMorgan Chase Total Mortgage Lending 2019-2022
Rochester, NY MSA
(1st lien loans on owner-occupied (principal & secondary), 1-4 family, site built units)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>MSA</td>
<td>360</td>
<td>243</td>
<td>437</td>
<td>251</td>
<td>-186</td>
<td>-43%</td>
<td>-109</td>
<td>-30%</td>
</tr>
<tr>
<td>City</td>
<td>32</td>
<td>15</td>
<td>36</td>
<td>40</td>
<td>4</td>
<td>11%</td>
<td>8</td>
<td>25%</td>
</tr>
<tr>
<td>Black/Latino HH</td>
<td>48</td>
<td>19</td>
<td>34</td>
<td>49</td>
<td>15</td>
<td>44%</td>
<td>1</td>
<td>2%</td>
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<tr>
<td>Low-Mod Income HH</td>
<td>120</td>
<td>66</td>
<td>108</td>
<td>109</td>
<td>1</td>
<td>1%</td>
<td>-11</td>
<td>-9%</td>
</tr>
<tr>
<td>Low-Mod Income CT</td>
<td>42</td>
<td>14</td>
<td>34</td>
<td>55</td>
<td>21</td>
<td>62%</td>
<td>13</td>
<td>31%</td>
</tr>
<tr>
<td>Majority Non-White CT</td>
<td>13</td>
<td>5</td>
<td>12</td>
<td>28</td>
<td>16</td>
<td>133%</td>
<td>15</td>
<td>115%</td>
</tr>
</tbody>
</table>

% of loans in:

<table>
<thead>
<tr>
<th></th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>2022</th>
<th>AFI</th>
</tr>
</thead>
<tbody>
<tr>
<td>City</td>
<td>9%</td>
<td>6%</td>
<td>8%</td>
<td>16%</td>
<td>12%</td>
</tr>
<tr>
<td>Black/Latino HH</td>
<td>13%</td>
<td>8%</td>
<td>8%</td>
<td>20%</td>
<td>11%</td>
</tr>
<tr>
<td>Low-Mod Income HH</td>
<td>33%</td>
<td>27%</td>
<td>25%</td>
<td>43%</td>
<td>43%</td>
</tr>
<tr>
<td>Low-Mod Income CT</td>
<td>12%</td>
<td>6%</td>
<td>8%</td>
<td>22%</td>
<td>21%</td>
</tr>
<tr>
<td>Majority Non-White CT</td>
<td>4%</td>
<td>2%</td>
<td>3%</td>
<td>11%</td>
<td>8%</td>
</tr>
</tbody>
</table>

Source: Annual HMDA LAR data from FFEIC and CFPB.
### Table 3: JPMorgan Chase Total Dollar Volume Mortgage Lending 2019-2022
Rochester, NY MSA

(Aggregate amount of 1st lien loans on owner-occupied (principal & secondary), 1-4 family, site built units, $)

<table>
<thead>
<tr>
<th></th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>2022</th>
<th># change</th>
<th>% change</th>
<th># change</th>
<th>% change</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MSA</strong></td>
<td>54,800</td>
<td>45,005</td>
<td>86,385</td>
<td>46,645</td>
<td>-39,740</td>
<td>-46%</td>
<td>-8,155</td>
<td>-15%</td>
</tr>
<tr>
<td><strong>City</strong></td>
<td>3,460</td>
<td>1,775</td>
<td>5,350</td>
<td>4,590</td>
<td>-760</td>
<td>-14%</td>
<td>1,130</td>
<td>33%</td>
</tr>
<tr>
<td><strong>Black/Latino HH</strong></td>
<td>6,710</td>
<td>3,045</td>
<td>5,170</td>
<td>6,785</td>
<td>1,615</td>
<td>31%</td>
<td>75</td>
<td>1%</td>
</tr>
<tr>
<td><strong>Low-Mod Income HH</strong></td>
<td>11,750</td>
<td>8,300</td>
<td>12,710</td>
<td>12,505</td>
<td>-205</td>
<td>-2%</td>
<td>755</td>
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</tr>
<tr>
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<td>3,980</td>
<td>1,650</td>
<td>4,420</td>
<td>6,635</td>
<td>2,215</td>
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<td>2,655</td>
<td>67%</td>
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<td><strong>Majority Non-White CT</strong></td>
<td>1,105</td>
<td>385</td>
<td>1,500</td>
<td>2,740</td>
<td>1,240</td>
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<th>2019</th>
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<th>2021</th>
<th>2022</th>
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<td>4%</td>
<td>6%</td>
<td>10%</td>
<td>8%</td>
</tr>
<tr>
<td><strong>Black/Latino HH</strong></td>
<td>12%</td>
<td>7%</td>
<td>6%</td>
<td>15%</td>
<td>9%</td>
</tr>
<tr>
<td><strong>Low-Mod Income HH</strong></td>
<td>21%</td>
<td>18%</td>
<td>15%</td>
<td>27%</td>
<td>29%</td>
</tr>
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<td><strong>Low-Mod Income CT</strong></td>
<td>7%</td>
<td>4%</td>
<td>5%</td>
<td>14%</td>
<td>15%</td>
</tr>
<tr>
<td><strong>Majority Non-White CT</strong></td>
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<td>6%</td>
<td>5%</td>
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</table>

Source: Annual HMDA LAR data from FFEIC and CFPB.
Table 4: JPMorgan Chase Home Purchase Loans 2019-2022
Rochester, NY MSA
(1st lien loans on owner-occupied (principal & secondary), 1-4 family, site built units)

<table>
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<tr>
<th></th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>2022</th>
<th># change</th>
<th>% change</th>
<th># change</th>
<th>% change</th>
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<td>175</td>
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<td>1%</td>
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<tr>
<td>City</td>
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<td>5</td>
<td>16</td>
<td>23</td>
<td>7</td>
<td>44%</td>
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<td>10%</td>
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<tr>
<td>Black/Latino HH</td>
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<td>27</td>
<td>14</td>
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<td>7</td>
<td>17%</td>
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<td>-17%</td>
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<tr>
<td>Low-Mod Income CT</td>
<td>25</td>
<td>8</td>
<td>18</td>
<td>31</td>
<td>13</td>
<td>72%</td>
<td>6</td>
<td>24%</td>
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<tr>
<td>Majority Non-White CT</td>
<td>10</td>
<td>3</td>
<td>7</td>
<td>18</td>
<td>11</td>
<td>157%</td>
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<table>
<thead>
<tr>
<th></th>
<th>2019</th>
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<tr>
<td>AFI</td>
<td></td>
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<tr>
<td>City</td>
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<td>19%</td>
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<tr>
<td>Black/Latino HH</td>
<td>17%</td>
<td>11%</td>
<td>11%</td>
<td>23%</td>
</tr>
<tr>
<td>Low-Mod Income HH</td>
<td>34%</td>
<td>41%</td>
<td>36%</td>
<td>41%</td>
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<tr>
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<td>15%</td>
<td>26%</td>
</tr>
<tr>
<td>Majority Non-White CT</td>
<td>6%</td>
<td>4%</td>
<td>6%</td>
<td>15%</td>
</tr>
</tbody>
</table>

Source: Annual HMDA LAR data from FFEIC and CFPB.
# Table 5: Top 8 Banks Total Mortgage Originations 2022

## Rochester, NY MSA

(1st lien loans on owner-occupied (principal and secondary), 1-4 family, site built units)

<table>
<thead>
<tr>
<th>Annual HMDA data</th>
<th>AFI</th>
<th>BOA</th>
<th>CNB</th>
<th>Citizens</th>
<th>Five Star</th>
<th>JPMC</th>
<th>KeyBank</th>
<th>Lyons NB</th>
<th>M&amp;T</th>
<th>Top 8</th>
<th>OFI</th>
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<tbody>
<tr>
<td>MSA</td>
<td>17,290</td>
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<td>1,149</td>
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<td>251</td>
<td>366</td>
<td>571</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
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<td>96</td>
<td>91</td>
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<td>30</td>
<td>14</td>
<td>79</td>
<td>433</td>
<td>1,570</td>
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<td>49</td>
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<td>20</td>
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<td>384</td>
<td>334</td>
<td>144</td>
<td>109</td>
<td>141</td>
<td>185</td>
<td>237</td>
<td>1,612</td>
<td>5,822</td>
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<td>3,571</td>
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<td>144</td>
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<td>61</td>
<td>121</td>
<td>124</td>
<td>795</td>
<td>2,776</td>
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<tr>
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<td>27</td>
<td>52</td>
<td>84</td>
<td>51</td>
<td>28</td>
<td>14</td>
<td>7</td>
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<td>333</td>
<td>1,070</td>
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## MARKETSHARE

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<th>BOA</th>
<th>CNB</th>
<th>Citizens</th>
<th>Five Star</th>
<th>JPMC</th>
<th>KeyBank</th>
<th>Lyons NB</th>
<th>M&amp;T</th>
<th>Top 8</th>
<th>OFI</th>
</tr>
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<tbody>
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<td>6.6%</td>
<td>3.3%</td>
<td>1.3%</td>
<td>1.5%</td>
<td>2.1%</td>
<td>3.3%</td>
<td>2.7%</td>
<td>22%</td>
<td>78%</td>
</tr>
<tr>
<td>City</td>
<td>1.6%</td>
<td>4.8%</td>
<td>4.5%</td>
<td>2.5%</td>
<td>2.0%</td>
<td>1.5%</td>
<td>0.7%</td>
<td>3.9%</td>
<td>22%</td>
<td>78%</td>
</tr>
<tr>
<td>Black/Latino HH</td>
<td>2.1%</td>
<td>3.3%</td>
<td>4.9%</td>
<td>3.5%</td>
<td>2.5%</td>
<td>1.0%</td>
<td>1.0%</td>
<td>4.7%</td>
<td>23%</td>
<td>77%</td>
</tr>
<tr>
<td>Low-Mod Income HH</td>
<td>1.0%</td>
<td>5.2%</td>
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<td>1.5%</td>
<td>1.9%</td>
<td>2.5%</td>
<td>3.2%</td>
<td>22%</td>
<td>78%</td>
</tr>
<tr>
<td>Low-Mod Income CT</td>
<td>1.3%</td>
<td>4.5%</td>
<td>4.0%</td>
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<td>1.5%</td>
<td>1.7%</td>
<td>3.4%</td>
<td>3.5%</td>
<td>22%</td>
<td>78%</td>
</tr>
<tr>
<td>Majority Non-White CT</td>
<td>1.9%</td>
<td>3.7%</td>
<td>6.0%</td>
<td>3.6%</td>
<td>2.0%</td>
<td>1.0%</td>
<td>0.5%</td>
<td>5.0%</td>
<td>24%</td>
<td>76%</td>
</tr>
</tbody>
</table>

Loans as %

<table>
<thead>
<tr>
<th>of MSA TOTAL IN:</th>
<th>AFI</th>
<th>BOA</th>
<th>CNB</th>
<th>Citizens</th>
<th>Five Star</th>
<th>JPMC</th>
<th>KeyBank</th>
<th>Lyons NB</th>
<th>M&amp;T</th>
<th>Top 8</th>
<th>OFI</th>
</tr>
</thead>
<tbody>
<tr>
<td>City</td>
<td>12%</td>
<td>22%</td>
<td>8%</td>
<td>16%</td>
<td>22%</td>
<td>16%</td>
<td>8%</td>
<td>2%</td>
<td>17%</td>
<td>12%</td>
<td>12%</td>
</tr>
<tr>
<td>Black/Latino HH</td>
<td>11%</td>
<td>27%</td>
<td>6%</td>
<td>16%</td>
<td>30%</td>
<td>20%</td>
<td>6%</td>
<td>4%</td>
<td>19%</td>
<td>12%</td>
<td>11%</td>
</tr>
<tr>
<td>Low-Mod Income HH</td>
<td>43%</td>
<td>52%</td>
<td>33%</td>
<td>58%</td>
<td>65%</td>
<td>43%</td>
<td>40%</td>
<td>32%</td>
<td>51%</td>
<td>43%</td>
<td>43%</td>
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<tr>
<td>Low-Mod Income CT</td>
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<td>31%</td>
<td>14%</td>
<td>25%</td>
<td>38%</td>
<td>22%</td>
<td>17%</td>
<td>21%</td>
<td>26%</td>
<td>21%</td>
<td>20%</td>
</tr>
<tr>
<td>Majority Non-White CT</td>
<td>8%</td>
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<td>5%</td>
<td>15%</td>
<td>23%</td>
<td>11%</td>
<td>4%</td>
<td>1%</td>
<td>15%</td>
<td>9%</td>
<td>8%</td>
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</table>


Prepared by: Empire Justice Center, [REDACTED CONTENT]
### Table 6: Top 8 Banks Dollar Volume HMDA Lending 2022
#### Rochester, NY MSA

<table>
<thead>
<tr>
<th>DOLLAR VOL LENDING</th>
<th>AFI</th>
<th>BOA</th>
<th>CNB</th>
<th>Citizens</th>
<th>Five Star</th>
<th>JPMC</th>
<th>KeyBank</th>
<th>Lyons NB</th>
<th>M&amp;T</th>
<th>Top 8</th>
<th>OFI</th>
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</thead>
<tbody>
<tr>
<td>MSA</td>
<td>$3,211,270</td>
<td>29,170</td>
<td>280,125</td>
<td>87,805</td>
<td>29,005</td>
<td>46,645</td>
<td>72,290</td>
<td>135,585</td>
<td>73,045</td>
<td>$753,670</td>
<td>$2,457,600</td>
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<td>4,665</td>
<td>16,280</td>
<td>8,775</td>
<td>4,930</td>
<td>4,590</td>
<td>5,560</td>
<td>2,500</td>
<td>8,555</td>
<td>$55,855</td>
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<td>6,810</td>
<td>12,070</td>
<td>11,255</td>
<td>7,145</td>
<td>6,785</td>
<td>4,050</td>
<td>4,640</td>
<td>11,410</td>
<td>$64,165</td>
<td>$233,935</td>
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<tr>
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<td>$940,830</td>
<td>10,760</td>
<td>54,810</td>
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<td>14,620</td>
<td>12,505</td>
<td>15,005</td>
<td>23,015</td>
<td>26,145</td>
<td>$195,740</td>
<td>$745,090</td>
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<td>6,635</td>
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<td>5,105</td>
<td>2,740</td>
<td>1,430</td>
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<td>7,080</td>
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<td>$118,760</td>
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#### MARKETSHARE

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<th>AFI</th>
<th>BOA</th>
<th>CNB</th>
<th>Citizens</th>
<th>Five Star</th>
<th>JPMC</th>
<th>KeyBank</th>
<th>Lyons NB</th>
<th>M&amp;T</th>
<th>Top 8</th>
<th>OFI</th>
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<tbody>
<tr>
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<td>8.7%</td>
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<td>1.5%</td>
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<td>77%</td>
</tr>
<tr>
<td>City</td>
<td>1.8%</td>
<td>6.1%</td>
<td>3.3%</td>
<td>1.9%</td>
<td>1.7%</td>
<td>2.1%</td>
<td>0.9%</td>
<td>3.2%</td>
<td>21%</td>
<td>79%</td>
<td></td>
</tr>
<tr>
<td>Black/Latino HH</td>
<td>2.3%</td>
<td>4.0%</td>
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<td>2.4%</td>
<td>2.3%</td>
<td>1.4%</td>
<td>1.6%</td>
<td>3.8%</td>
<td>22%</td>
<td>78%</td>
<td></td>
</tr>
<tr>
<td>Low-Mod Income HH</td>
<td>1.1%</td>
<td>5.8%</td>
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<td>1.3%</td>
<td>1.6%</td>
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<td>2.8%</td>
<td>21%</td>
<td>79%</td>
<td></td>
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<tr>
<td>Low-Mod Income CT</td>
<td>1.2%</td>
<td>5.8%</td>
<td>3.1%</td>
<td>1.8%</td>
<td>1.4%</td>
<td>1.5%</td>
<td>4.1%</td>
<td>3.1%</td>
<td>22%</td>
<td>78%</td>
<td></td>
</tr>
<tr>
<td>Majority Non-White CT</td>
<td>2.2%</td>
<td>4.2%</td>
<td>5.0%</td>
<td>3.3%</td>
<td>1.8%</td>
<td>0.9%</td>
<td>0.6%</td>
<td>4.6%</td>
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<td>77%</td>
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<tr>
<th>Loans as % of MSA TOTAL IN:</th>
<th>AFI</th>
<th>BOA</th>
<th>CNB</th>
<th>Citizens</th>
<th>Five Star</th>
<th>JPMC</th>
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<th>M&amp;T</th>
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<tr>
<td>Black/Latino HH</td>
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<td>4%</td>
<td>13%</td>
<td>25%</td>
<td>15%</td>
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<td>3%</td>
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<td>9%</td>
<td>10%</td>
</tr>
<tr>
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<td>20%</td>
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<td>50%</td>
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<tr>
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<td>18%</td>
<td>6%</td>
<td>2%</td>
<td>1%</td>
<td>10%</td>
<td>5%</td>
<td>5%</td>
</tr>
</tbody>
</table>


Prepared by: Empire Justice Center,  [REDACTED CONTENT]
### Table 7: Top 8 Banks Home Purchase Originations 2022

**Rochester, NY MSA**

(1st lien home purchase loans on owner-occupied (principal and secondary), 1-4 family, site built units)

<table>
<thead>
<tr>
<th>Annual HMDA data</th>
<th>AFI</th>
<th>BOA</th>
<th>CNB</th>
<th>Citizens</th>
<th>Five Star</th>
<th>JPMC</th>
<th>KeyBank</th>
<th>Lyons NB</th>
<th>M&amp;T</th>
<th>Top 8</th>
<th>OFI</th>
</tr>
</thead>
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<td>144</td>
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### MARKETSHARE

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<th>Citizens</th>
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<th>JPMC</th>
<th>KeyBank</th>
<th>Lyons NB</th>
<th>M&amp;T</th>
<th>Top 8</th>
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<td>1.0%</td>
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</tr>
<tr>
<td>Black/Latino HH</td>
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<td>2.7%</td>
<td>5.0%</td>
<td>2.2%</td>
<td>1.0%</td>
<td>1.4%</td>
<td>5.1%</td>
<td>24%</td>
<td>76%</td>
</tr>
<tr>
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<td>1.2%</td>
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<td>19%</td>
<td>81%</td>
</tr>
<tr>
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<td>3.3%</td>
<td>1.4%</td>
<td>1.1%</td>
<td>3.0%</td>
<td>4.0%</td>
<td>21%</td>
<td>79%</td>
</tr>
<tr>
<td>Majority Non-White CT</td>
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<td>3.3%</td>
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<td>0.7%</td>
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<table>
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<th>Loans as % of MSA TOTAL IN:</th>
<th>AFI</th>
<th>BOA</th>
<th>CNB</th>
<th>Citizens</th>
<th>Five Star</th>
<th>JPMC</th>
<th>KeyBank</th>
<th>Lyons NB</th>
<th>M&amp;T</th>
<th>Top 8</th>
<th>OFI</th>
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</thead>
<tbody>
<tr>
<td>City</td>
<td>13%</td>
<td>31%</td>
<td>9%</td>
<td>35%</td>
<td>34%</td>
<td>19%</td>
<td>11%</td>
<td>4%</td>
<td>26%</td>
<td>15%</td>
<td>13%</td>
</tr>
<tr>
<td>Black/Latino HH</td>
<td>13%</td>
<td>38%</td>
<td>7%</td>
<td>44%</td>
<td>43%</td>
<td>23%</td>
<td>9%</td>
<td>6%</td>
<td>31%</td>
<td>17%</td>
<td>12%</td>
</tr>
<tr>
<td>Low-Mod Income HH</td>
<td>42%</td>
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<td>34%</td>
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<td>71%</td>
<td>41%</td>
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<td>41%</td>
</tr>
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<td>49%</td>
<td>26%</td>
<td>17%</td>
<td>21%</td>
<td>42%</td>
<td>26%</td>
<td>22%</td>
</tr>
<tr>
<td>Majority Non-White CT</td>
<td>9%</td>
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<td>6%</td>
<td>38%</td>
<td>35%</td>
<td>15%</td>
<td>5%</td>
<td>2%</td>
<td>26%</td>
<td>13%</td>
<td>9%</td>
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Prepared by: Empire Justice Center, [REDACTED CONTENT]
<table>
<thead>
<tr>
<th>Table 8: JPMorgan Chase Small Business Lending 2019-2022</th>
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</thead>
<tbody>
<tr>
<td>Rochester NY MSA (Inside and Outside Assessment Area)</td>
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### Number of Loans

<table>
<thead>
<tr>
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<th></th>
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<th></th>
<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td># change</td>
<td>% change</td>
<td># change</td>
<td>% change</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Rochester MSA Total</td>
<td>3,727</td>
<td>2,026</td>
<td>2,957</td>
<td>3,462</td>
<td>505</td>
<td>17%</td>
<td>-265</td>
<td>-7%</td>
</tr>
<tr>
<td>Rochester MSA in LMI CT</td>
<td>544</td>
<td>332</td>
<td>483</td>
<td>627</td>
<td>144</td>
<td>30%</td>
<td>83</td>
<td>15%</td>
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<tr>
<td>Loan Amt &lt;= $100,000</td>
<td>3,701</td>
<td>1,909</td>
<td>2,906</td>
<td>3,439</td>
<td>533</td>
<td>18%</td>
<td>-262</td>
<td>-7%</td>
</tr>
<tr>
<td>Loan Amt &lt;= $100,000 in LMI CT</td>
<td>538</td>
<td>307</td>
<td>476</td>
<td>618</td>
<td>142</td>
<td>30%</td>
<td>30</td>
<td>15%</td>
</tr>
<tr>
<td>Bus. w. GAR &lt; $1 M</td>
<td>1,940</td>
<td>1,040</td>
<td>1,659</td>
<td>2,359</td>
<td>700</td>
<td>42%</td>
<td>419</td>
<td>22%</td>
</tr>
<tr>
<td>Bus. w. GAR &lt; $1 M in LMI CT</td>
<td>264</td>
<td>171</td>
<td>267</td>
<td>409</td>
<td>142</td>
<td>53%</td>
<td>145</td>
<td>55%</td>
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</table>

### AFI

<table>
<thead>
<tr>
<th>% of Rochester MSA Loans In:</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>2022</th>
<th>2022</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rochester MSA in LMI CT</td>
<td>15%</td>
<td>16%</td>
<td>16%</td>
<td>18%</td>
<td>19%</td>
</tr>
<tr>
<td>Loan Amt &lt;= $100,000</td>
<td>99%</td>
<td>94%</td>
<td>98%</td>
<td>99%</td>
<td>91%</td>
</tr>
<tr>
<td>Loan Amt &lt;= $100,000 in LMI CT</td>
<td>14%</td>
<td>15%</td>
<td>16%</td>
<td>18%</td>
<td>17%</td>
</tr>
<tr>
<td>Bus. w. GAR &lt; $1 M</td>
<td>52%</td>
<td>51%</td>
<td>56%</td>
<td>68%</td>
<td>43%</td>
</tr>
<tr>
<td>Bus. w. GAR &lt; $1 M in LMI CT</td>
<td>7%</td>
<td>8%</td>
<td>9%</td>
<td>12%</td>
<td>7%</td>
</tr>
</tbody>
</table>

### Aggregate Amount of Loans (Millions of Dollars)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
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<th></th>
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</thead>
<tbody>
<tr>
<td></td>
<td># change</td>
<td>% change</td>
<td># change</td>
<td>% change</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rochester MSA Total</td>
<td>$50.04</td>
<td>$67.60</td>
<td>$49.63</td>
<td>$46.33</td>
<td>$-3.31</td>
<td>-7%</td>
<td>$-3.72</td>
<td>-7%</td>
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<tr>
<td>Avg Loan Size (in thousands)</td>
<td>$13.43</td>
<td>$33.37</td>
<td>$16.78</td>
<td>$13.38</td>
<td>$-3.40</td>
<td>-20%</td>
<td>$-0.05</td>
<td>0%</td>
</tr>
<tr>
<td>Rochester MSA in LMI CT</td>
<td>$8.96</td>
<td>$13.42</td>
<td>$9.20</td>
<td>$8.49</td>
<td>$-0.71</td>
<td>-8%</td>
<td>$-0.47</td>
<td>-5%</td>
</tr>
<tr>
<td>Loan Amt &lt;= $100,000</td>
<td>$41.41</td>
<td>$32.79</td>
<td>$35.39</td>
<td>$39.46</td>
<td>$4.07</td>
<td>11%</td>
<td>$-1.95</td>
<td>-5%</td>
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<tr>
<td>Loan Amt &lt;= $100,000 in LMI CT</td>
<td>$6.73</td>
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<td>$6.57</td>
<td>$7.71</td>
<td>$1.14</td>
<td>17%</td>
<td>$0.98</td>
<td>15%</td>
</tr>
<tr>
<td>Bus. w. GAR &lt; $1 M</td>
<td>$22.71</td>
<td>$15.77</td>
<td>$15.08</td>
<td>$24.48</td>
<td>$9.40</td>
<td>62%</td>
<td>$1.77</td>
<td>8%</td>
</tr>
<tr>
<td>Bus. w. GAR &lt; $1 M in LMI CT</td>
<td>$3.24</td>
<td>$3.20</td>
<td>$2.55</td>
<td>$4.21</td>
<td>$1.66</td>
<td>65%</td>
<td>$0.97</td>
<td>30%</td>
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</table>

### AFI

<table>
<thead>
<tr>
<th>% of Rochester MSA Loans In:</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>2022</th>
<th>2022</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rochester MSA in LMI CT</td>
<td>18%</td>
<td>20%</td>
<td>19%</td>
<td>18%</td>
<td>22%</td>
</tr>
<tr>
<td>Loan Amt &lt;= $100,000</td>
<td>83%</td>
<td>49%</td>
<td>71%</td>
<td>85%</td>
<td>36%</td>
</tr>
<tr>
<td>Loan Amt &lt;= $100,000 in LMI CT</td>
<td>13%</td>
<td>9%</td>
<td>13%</td>
<td>17%</td>
<td>7%</td>
</tr>
<tr>
<td>Bus. w. GAR &lt; $1 M</td>
<td>45%</td>
<td>23%</td>
<td>30%</td>
<td>53%</td>
<td>26%</td>
</tr>
<tr>
<td>Bus. w. GAR &lt; $1 M in LMI CT</td>
<td>6%</td>
<td>5%</td>
<td>5%</td>
<td>9%</td>
<td>5%</td>
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</tbody>
</table>

**Notes:** From annual FFIEC CRA small business lending public data, available at [https://www.ffiec.gov/cra/craproducts.htm](https://www.ffiec.gov/cra/craproducts.htm).
Table 9: Top 8 Banks Small Business Lending, 2022
Top 8 Depositories, Rochester, NY MSA

<table>
<thead>
<tr>
<th>Number of Loans</th>
<th>AFI</th>
<th>BOA</th>
<th>CNB</th>
<th>Citizens</th>
<th>Cmty Bk</th>
<th>Five Star</th>
<th>JPMC</th>
<th>KeyBank</th>
<th>M&amp;T</th>
<th>Top 7</th>
<th>Top 8</th>
<th>OFI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rochester MSA Total</td>
<td>19,566</td>
<td>871</td>
<td>1,343</td>
<td>115</td>
<td>124</td>
<td>94</td>
<td>3,462</td>
<td>677</td>
<td>579</td>
<td>7,141</td>
<td>7,265</td>
<td>12,301</td>
</tr>
<tr>
<td>Rochester MSA in LMI CT</td>
<td>4,101</td>
<td>197</td>
<td>289</td>
<td>32</td>
<td>29</td>
<td>27</td>
<td>627</td>
<td>166</td>
<td>112</td>
<td>1,450</td>
<td>1,479</td>
<td>2,622</td>
</tr>
<tr>
<td>Loan Amt &lt;= $100,000</td>
<td>18,442</td>
<td>840</td>
<td>1,118</td>
<td>103</td>
<td>85</td>
<td>55</td>
<td>3,439</td>
<td>613</td>
<td>410</td>
<td>6,578</td>
<td>6,663</td>
<td>11,779</td>
</tr>
<tr>
<td>Bus. w. GAR &lt; $1 M</td>
<td>9,953</td>
<td>553</td>
<td>680</td>
<td>90</td>
<td>95</td>
<td>52</td>
<td>2,359</td>
<td>348</td>
<td>358</td>
<td>4,440</td>
<td>4,535</td>
<td>5,418</td>
</tr>
<tr>
<td>Percentage of Rochester MSA Loans In:</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AFI</td>
<td>3.9%</td>
<td>19.4%</td>
<td>0.8%</td>
<td>2.6%</td>
<td>2.9%</td>
<td>7.3%</td>
<td>5.3%</td>
<td>12.8%</td>
<td>52.4%</td>
<td>55.4%</td>
<td>47.4%</td>
<td>3.9%</td>
</tr>
<tr>
<td>BOA</td>
<td>23.0%</td>
<td>18.2%</td>
<td>20.6%</td>
<td>16.0%</td>
<td>28.1%</td>
<td>37.2%</td>
<td>18.3%</td>
<td>31.8%</td>
<td>20.9%</td>
<td>22.1%</td>
<td>22.4%</td>
<td>23.8%</td>
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<tr>
<td>CNB</td>
<td>41.3%</td>
<td>52.2%</td>
<td>38.7%</td>
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<td>24.2%</td>
<td>8.4%</td>
<td>85.2%</td>
<td>28.2%</td>
<td>16.9%</td>
<td>38.2%</td>
<td>37.5%</td>
<td>46.0%</td>
</tr>
<tr>
<td>Citizens</td>
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<td>8.3%</td>
<td>13.7%</td>
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<td>8.0%</td>
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<tr>
<td>Cmty Bk</td>
<td>34.8%</td>
<td>37.0%</td>
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<td>50.3%</td>
<td>64.7%</td>
<td>20.7%</td>
<td>52.9%</td>
<td>24.8%</td>
<td>40.6%</td>
<td>39.2%</td>
<td>40.5%</td>
<td>27.8%</td>
</tr>
<tr>
<td>Five Star</td>
<td>7.0%</td>
<td>7.1%</td>
<td>7.9%</td>
<td>11.7%</td>
<td>17.5%</td>
<td>9.0%</td>
<td>9.1%</td>
<td>6.5%</td>
<td>8.3%</td>
<td>8.1%</td>
<td>8.6%</td>
<td>5.1%</td>
</tr>
</tbody>
</table>

Notes: Lyons NB reported no loans, so included the next largest bank—Community Bank (Cmty Bk). Top 7 does NOT include Cmty Bk.
AFI: All Financial Institutions
OFI: Other Financial Institutions
Prepared by: Empire Justice Center, [REDACTED CONTENT]
### Table 10a: JPMorgan Chase's Total Community Development Lending, Investments and Grants and CRA Eligible Mortgage and Small Business Lending

<table>
<thead>
<tr>
<th>Rochester MSA</th>
<th>2024 Exam Period (2020-2022) #</th>
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<tbody>
<tr>
<td></td>
<td>Economic Development/Revitalization</td>
</tr>
<tr>
<td>Community Development Loans</td>
<td>$23.67</td>
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<tr>
<td>Community Development Investments</td>
<td>$25.08</td>
</tr>
<tr>
<td>CRA-Eligible Grants/Donations</td>
<td>$0.25</td>
</tr>
<tr>
<td>Subtotal</td>
<td>$23.67</td>
</tr>
<tr>
<td>Mortgage Lending*</td>
<td>$40.58</td>
</tr>
<tr>
<td>Small Business Lending**</td>
<td>$76.49</td>
</tr>
<tr>
<td>Total</td>
<td>$100.16</td>
</tr>
<tr>
<td>Annualized over 3 years</td>
<td>$33.39</td>
</tr>
</tbody>
</table>

Notes: * Includes all HMDA mortgage originations to low-moderate income households and/or in low-moderate census tracts for 2019-21 (unduplicated)
** Includes CRA Small business loans in low-moderate income census tracts and/or to businesses with gross annual revenues under $1 million for 2019-2021 (unduplicated).
# While the exam period is 2020-2023, numbers were only available through 2022. CDLI numbers provided by JPMorgan Chase, mortgage and small business lending numbers calculated by Empire Justice Center.
Annualized the reinvestments over 3 years, even though the entire exam period is 4 years, given that the 2023 numbers were not available.

### Table 10b: JPMorgan Chase's Deposits, CRA-Related Reinvestments & % Deposits Reinvested in the Rochester NY Community Across Exams

<table>
<thead>
<tr>
<th></th>
<th>Deposits (millions)</th>
<th>Reinvestments (millions)</th>
<th>% Deposits Reinvested</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total Over Entire Exam</td>
<td>Annualized</td>
<td>Entire Exam Period</td>
</tr>
<tr>
<td>2024 Exam Period (2020-2022, 3 years)</td>
<td>$3,648</td>
<td>$289</td>
<td>$96</td>
</tr>
<tr>
<td>2016 Exam Period (2011-2013, 3 years)</td>
<td>$2,082</td>
<td>$169</td>
<td>$56</td>
</tr>
<tr>
<td>2011 Exam Period (2007-2010, 4 years)</td>
<td>$1,293</td>
<td>$360</td>
<td>$90</td>
</tr>
<tr>
<td>2007 Exam Period (2004-2006, 3 years)</td>
<td>$1,993</td>
<td>$286</td>
<td>$95</td>
</tr>
<tr>
<td>2007-2024 Change (#)</td>
<td>$1,655</td>
<td>$3</td>
<td>$1</td>
</tr>
<tr>
<td>2007-2024 Change (%)</td>
<td>83%</td>
<td>1%</td>
<td>1%</td>
</tr>
</tbody>
</table>
Table 11: JPMorgan Chase’s Annual Community Development Lending, Investments and Grants and CRA Eligible Mortgage and Small Business Lending (in millions)

Rochester NY MSA, 2020-2022

<table>
<thead>
<tr>
<th></th>
<th>2020</th>
<th>2021</th>
<th>2022</th>
<th># Change 2020-2022</th>
<th>% Change 2020-2022</th>
</tr>
</thead>
<tbody>
<tr>
<td>FDIC Deposits</td>
<td>$3,126.3</td>
<td>$3,407.1</td>
<td>$3,647.7</td>
<td>$521.4</td>
<td>17%</td>
</tr>
<tr>
<td>Depository Market Share</td>
<td>13.9%</td>
<td>13.5%</td>
<td>14.1%</td>
<td>0.2%</td>
<td>1%</td>
</tr>
<tr>
<td>LMI Mortgage Lending*</td>
<td>9.5</td>
<td>15.2</td>
<td>15.9</td>
<td>$6.4</td>
<td>68%</td>
</tr>
<tr>
<td>LMI Small Business Lending**</td>
<td>26.0</td>
<td>21.7</td>
<td>28.8</td>
<td>2.8</td>
<td>11%</td>
</tr>
<tr>
<td>Total LMI Mortgage and LMI Small Business Lending</td>
<td>$35.5</td>
<td>$37.0</td>
<td>$44.7</td>
<td>$9.2</td>
<td>26%</td>
</tr>
<tr>
<td>Community Development Lending***</td>
<td>57.3</td>
<td>30.2</td>
<td>58.4</td>
<td>$1.1</td>
<td>2%</td>
</tr>
<tr>
<td>Community Development Investments***</td>
<td>4.2</td>
<td>20.9</td>
<td>-</td>
<td>-4.2</td>
<td>-100%</td>
</tr>
<tr>
<td>CRA-Eligible Grants***</td>
<td>0.5</td>
<td>-</td>
<td>0.3</td>
<td>-0.2</td>
<td>-43%</td>
</tr>
<tr>
<td>Total CDLI</td>
<td>$62.0</td>
<td>$51.1</td>
<td>$58.7</td>
<td>-3.33</td>
<td>-5%</td>
</tr>
<tr>
<td>Total Annual CRA-Related Reinvestments</td>
<td>$97.5</td>
<td>$88.0</td>
<td>$103.4</td>
<td>$5.9</td>
<td>6%</td>
</tr>
<tr>
<td>Percent of deposits reinvested in community</td>
<td>3.1%</td>
<td>2.6%</td>
<td>2.8%</td>
<td>-0.3%</td>
<td>-9%</td>
</tr>
</tbody>
</table>

* Includes all mortgage originations to low-moderate income households and/or in low-moderate income census tracts for that year (unduplicated).
** Includes CRA small business loans in low-moderate income census tracts or to businesses with gross annual revenues under $1 million for that year (unduplicated); calculated by Empire Justice.
*** Annual numbers reported by JPMC.

Prepared by Empire Justice Center, 02/27/2024.
DATE: February 29, 2024
TO: Empire Justice Center
RE: JP Morgan Chase Bank

In anticipation of the pending CRA review there are two aspects of Chase banking service that merit comment.

1) Closure of the Chase “West End Branch”

Chase, and its predecessor Lincoln-Alliance Bank across the street at 886 West Main St., have met the banking needs for the Bull’s Head area since 1922 – a hundred years!

Closing the Chase branch office at 36 Genesse St. at Bull’s Head in October 2022 left our community with no full-service physical bank office. Although the closure was required to enable the City of Rochester’s Bull’s Head Revitalization Project, the community had hoped that Chase would relocate temporarily to nearby vacant office space. It did not relocate.

This branch closure has been a huge loss for our community in which 28% of the dwelling units have no vehicle, and over 400 business entities line the surrounding commercial corridors. Further, Chase has given no indication that they would return to the Bull’s Head area after the planned revitalization.

2) Mortgage Lending

An informal look at recent JP Morgan Chase Bank mortgage lending numbers in Monroe County was undertaken. Some observations are below.

Source: Monroe County Records, searching for all variants of “JP Morgan Chase, NA”

Period: The most recent full calendar year from January 1 to December 31, 2023

Total: Found 106 mortgages for 1 and 2-family dwellings in Monroe County

Mortgages: included were primarily for purchases, plus a few refi’s and loan modifications

The chart on the following page illustrates the breakdown of Chase mortgages in Monroe County over the past calendar year.
Observations:

- **City vs Suburbs**: of 106 loans, 72 (67.9%) were outside the City vs 34 (32.1%) were for City of Rochester homes.

- **SW Quadrant vs other parts of the City**: Of the 34 City loans, 7 were in the SW Quadrant (19th Ward plus five adjacent neighborhoods). This suggests balance across City quadrants.

- **City Owner-Occupancy** – although the chart does not illustrate this, 32 of the 34 City loans (94%) were placed with owner-occupants. This is a commendable very high percentage, indicating intentionality on the part of Chase!

- **Purchase vs Other Loans** – of the 34 City loans, 22 (65%), were used to purchase a home. There were only 5 refinances, 5 loan modifications and no HELOC’s.

Although Chase is a relatively small player in Monroe County home purchase lending, we found their support for owner-occupancy very welcome. Based on the above metrics, a larger volume of Chase mortgages for owner-occupants would be welcome in the future.

We ask that our comments be included in the upcoming CRA review for JP Morgan Chase.

Sincerely,

[REDACTED CONTENT]

C: [REDACTED CONTENT], President, [REDACTED CONTENT]
Dear [REDACTED CONTENT]:

We appreciate the opportunity to assist you.

At least 90 days prior to the projected branch closing date, we provide notice of the planned branch closing to customers of the closing branch. We must do this because we are required to by law. The notice includes details about the closing, how it will affect you, and what we will do with your account.

We deny all allegations of not meeting community credit needs and Community Reinvestment Act (CRA) violations. We are not able to provide you with a list of CRA data for the affected branch because the CRA only tracks activities at the branch level, and our Financial Services Administration Office does not have access to the CRA data.

In October 2023, I contacted Chase credit card services by phone to request an interest rate reduction. The interest rate for this card is double what it should be, and I was told that Chase would not consider reducing it. These predatory lending practices target poor credit, low income, and very high interest rates.

Since then, I have had numerous calls with Chase representatives, making little progress on the refund. While I understand that you cannot comment about other customers and their possible similar experiences, as every situation is particular to the individuals involved, I hope you can do better in the future.

Thank you for taking the time to tell us about our service. Your feedback helps us serve you better. Our goal is to provide you with the best possible service.

Sincerely,

[REDACTED CONTENT]
Just fyi, this is my feedback on recent Chase website survey I completed recently on how Chase can improve itself: The retail branch located in my city, ie West Alameda, CA does not open on Saturdays which is very unusual and not acceptable. Perhaps the branch can close on Tues instead of Saturdays. And your interest rate on both checking and savings accounts are too low compared to other banks. And the Billpay feature does not allow email confirm email notifications on each batch payment nor show historical payment by vendor.

JPMC representative helped client submitted his feedback on the Help & Feedback link.

San Francisco-Oakland-Berkeley, CA

Note: Portions of correspondence may be redacted to protect customer privacy.
ANOTHER THING COMING, AND HERE’S WHY “Chase, you’re picking on the wrong Americans!”

MAKE THAT NEW YORK CITY RECORD-BREAKING HOUSING AUTHORITY SCAM LOOK LIKE ‘SMALL POTATOES’ IN COMPARISON, THEN YOU HAVE CRIMINAL ENTERPRISE-LIKE SCAM, CONDUCTED BY THE ‘BIG BANKS’ IN ABSOLUTE COLLUSION AND A SCAM SO HUMONGOUS THAT IT WOULD PERFORM THEMSELVES JUST LIKE THEIR CROOKED NEIGHBORS OF CHASE RIGHT NEXT DOOR IN NEW YORK CITY, THE ONES WHO PERFORMED THE STATES TAXPAYERS. ILLICIT, AND UNLAWFUL CONDUCT IN THEIR BEHAVIOR OF DEFRAUDING, HOODWINKING, AND DECEIVING THE HONEST HARDWORKING UNITED HOMEOWNER FROM PENNSYLVANIA WHO HAS RESIDED IN THE SAME HOME FOR 27 YEARS BECAUSE I DON’T AGREE TO THEIR FRAUDULENT, WILL JPMORGAN CHASE BANK EVER BE AN HONEST BANK? WELL, I DON’T THINK SO, AS THEY FORCE ME OUT INTO THE STREETS, AN ELDERLY BANKERS’ GO TO PRISON, SUCH AS THIS FINE PLACE, FACT, TO WIT, QUOTE... WOULD CHASE?

THE HOMEOWNERS WHO HAD ALREADY SUFFERED PLENTY FROM THE COVID-19 PANDEMIC, A GOVERNMENT PROGRAM THAT IS STILL ONGOING . . . AND THEN EXPECTING THE UNITED STATES TREASURY TO PAY FOR THOSE PHONY CHARGES ON BEHALF OF THE HAF APPLICANTS WHO WERE MORE, . . . BECAUSE THOSE HAF APPLICANTS WHO HAD SUFFERED DURING THE COVID-19 GLOBAL PANDEMIC, NOW, WOULD THEY?

AMERICAN HOMEOWNERS, PARTICULARLY AFTER THOSE HOMEOWNERS HAD ALREADY SUFFERED IMMENSELY AND PLENTY FROM A COVID-19 GLOBAL PANDEMIC, HOW, WOULD THEY?

. . . BECAUSE THOSE HAP APPLICANTS WHO HAD SUFFERED DURING THE COVID-19 GLOBAL PANDEMIC AND NATIONAL EMERGENCY, SUCH AS I DO, PARTICULARLY IF YOU ARE AN ELDERLY HAP APPLICANT, CHASE WOULD FORCE YOU OFF THE STREET AND BOOT YOU TO THE CURB AFTER YOU LIVED IN THE SAME HOUSE FOR 27 YEARS, SUCH AS I HAVE, IF YOU DON’T AGREE WITH CHASE’S FALSE PAYOFF NUMBERS BY INFLATING THEIR SO FICTITIOUS PAYOFF NUMBERS, WOULD CHASE?

AND THEN EXPECTING THE UNITED STATES TREASURY TO PAY FOR THOSE PHONY CHARGES ON BEHALF OF THE HAP APPLICANTS WHO WERE THE HOMEOWNERS WHO HAD ALREADY SUFFERED Fruzni FROM THE COVID-19 PANDEMIC, A GOVERNMENT PROGRAM THAT IS STILL ONGOING THROUGH AT LEAST CALENDAR YEAR 2024, WHILE CHASE CONTINUES TO DEFRAUD, BAMBOOZLE, AND CON Y’ALL, WOULD THEY?

BECAUSE CHASE IS THE FINEST FOLKS ON THE PLANET. AND CHASE DOESN’T DISCRIMINATE AGAINST THE ELDERLY BECAUSE THAT WOULD BE NOT JUST BE HIGHLY IMMORAL, THAT WOULD ALSO BE ILLEGAL, A BIG NO-NO FOR CHASE, SO IT IS LEGAL TO DISCRIMINATE AGAINST THE ELDERLY, SUCH AS I AM, CHASE WOULD NEVER CONSIDER SUCH A THING, WOULD CHASE?

WELL, IF YOU BELIEVE THAT, I HAVE SOME FINE REAL ESTATE FOR SALE IN THE DEEPEST PART OF THE EVERGLADES IN THE FINE STATE OF FLORIDA, FOR A FRAUDULENT, PHONY SO-CALLED “CORPORATE ADVANCES” LIKE WHAT COULD HAVE HAPPENED TO ME, ALL FALSE, FABRICATED, AND FICTITIOUS FEES, CHARGES, AND EXPENSES UNDER THAT CATEGORY, HAIR, NEVER, NOT CHASE...NO, NOT WELLS FARGO, NO TRUST, NO, NO IN THE UNITED STATES, . . . BUT WAIT, THERE’S MORE... AND IT’S NOT JUST THE UNITED STATES THAT IS THE CASE, THAT IS THE CASE LIKE AT ALL THE FRAUD, SCAMMING, AND HOODSWinking CONDUCT, AS CHASE COULD MAKE IT HAPPEN TO ME... BUT CHASE NEVER CONSIDER SUCH A THING, WOULD CHASE?

HOW’S WITH ME TO GO TO MANHATTAN, NEW YORK CITY, TO WITNESS THE SO CALLED ‘PERF WAEK’ WHEN THE FLEETING OF CHASE EXECUTIVES PERFORM THEMSELVES, UNTIL THEIR EGO-SIZED GLOVES OF CHASE RIGHT NEXT DOOR IN NEW YORK CITY, THE ONES WHO PERFORMED THE ‘PERF WAEK’ JUST TWO WEEKS AGI, RE.

To New York City housing employees charged in legend single-day bribery bust in DGI history (reuters.com) ,

AND, FACT, TO WIT, QUOTE 

“After JPMorgan Chase Admits to its 4th and 5th Felony Charge, Its Board Gives a $50 Million Bonus to its CEO, Jamie Dimon (bullstreetreport.com)”,

AND, FACT, TO WIT, QUOTE

How is a corrupt criminal like Jamie Dimon, not in prison for fraud? | by Blair Erickson | Medium AND FACT, TOW WIT, QUOTE; 3 Count Felony, JPMorgan Chase, Caught Laundering More Dirty Money – CounterPunch.org.”

AND THIS BEGINS THE QUESTION, WHY DOESN’T THE UNITED STATES TAKE A PAGE OUT OF THE PLAYBOOK OF SOME OTHER NATIONS WHERE BAD BANKERS GO TO PRISON, SUCH AS THIS FINE PLACE, FACT, TO WIT, QUOTE

Welcome to Iceland, Where Bad Bankers Go To Prison - Bloomberg

WILL JPMORGAN CHASE BANK EVER BE AN HONEST BANK? WELL, I DON’T THINK SO, AS THEY FORCE ME OUT INTO THE STREETS, AN ELDERLY HOMEOWNER FROM PENNSYLVANIA WHO HAS RESIDED IN THE SAME HOME FOR 27 YEARS BECAUSE I DON’T AGREE TO THEIR FRAUDULENT, ILLICIT, AND UNLAWFUL CONDUCT IN THEIR BEHAVIOR OF DEFRAUDING, HOODWINKING, AND DECEIVING THE HONEST HARDWORKING UNITED STATES TAXPAYERS.

WHO’S WITH ME TO GO TO MANHATTAN, NEW YORK CITY, TO WITNESS THE SO CALLED ‘PERF WAEK’ WHEN THE FLEETING OF CHASE EXECUTIVES PERFORM THEMSELVES, UNTIL THEIR EGO-SIZED GLOVES OF CHASE RIGHT NEXT DOOR IN NEW YORK CITY, THE ONES WHO PERFORMED THE ‘PERF WAEK’ JUST TWO WEEKS AGI, RE.

To New York City housing employees charged in legend single-day bribery bust in DGI history (reuters.com) ,

AND, IF YOU DON’T BELIEVE THAT THE U.S.-SO CALLED ‘BIG FOUR BANKS’ ARE NOT COMPETITORS IN THE MARKETPLACE, THEN YOU HAVE ANOTHER THING COMING, AND HERE’S WHY “Chase, you’re picking on the wrong Americans!”

And Capital One Bank N.A. says: “Why is he using all CAPTIALS?”
2024 TWITTER 2/29/2024 ITS A SCAM to life in America is for the greedy, tax bound, uber rich and certainly not hardworking families trying to get out of debt @Chase despicable how you treat customers and keep people in poverty, shame on you! 2/2

2024 TWITTER 3/13/2024 Very exciting interview with Jamie Dimon. Our partners at @jpmorgan @Chase are making a permanent commitment to advancing #RacialEquity through #SupplierDiversity, #AffordableHousing and more. @indyrecorder indianapolisrecorder.com/executive-conv...

2024 INSTAGRAM 3/26/2024 #financialliteracy for #younglearners #studentassembly middlesexcharter chase community 🌟 A Huge Shoutout to Mr. Rodriguez from Chase Bank! 🌟 Yesterday, our 3rd graders had the privilege of learning about money and budgeting, thanks to Mr. Rodriguez from Chase Bank! His engaging lesson covered understanding the difference between needs and wants and smart budget allocation. 🏦💡 We truly appreciate Mr. Rodriguez taking the time to visit and impart such valuable knowledge. It was an eye-opener for many and sparked great conversations among our young learners about financial responsibility. 💡✨ A big round of applause also goes to our fantastic teachers who played a crucial role in guiding the students through the activities, ensuring the lessons learned were both fun and meaningful. 🎓🌟 Thank you, Mr. Rodriguez and our dedicated teachers, for making a real difference in our students’ education! 🌈📚 FinancialLiteracy EducationMatters ThankYou ChaseBank LearningIsFun

2024 FACEBOOK 3/28/2024 There’s a whole file with your bank where we tried getting a refinance of ten years, instead we were given a mortgage modification adding an additional 100000 to the loan. If Chase would of worked with us back in 2011 the house would have been paid for. Instead they told us no programs were available. It’s predatory lending the way we’ve been treated with this bank.

*Note: Special characters and emojis may be edited to improve accessibility*