CITY AND COUNTY OF SAN FRANCISCO
BOARD OF SUPERVISORS
BUDGET AND LEGISLATIVE ANALYST

1390 Market Street, Suite 1150, San Francisco, CA 94102
(415) 552-9292 FAX (415) 252-0461

Policy Analysis Report

To:	Supervisor Fewer
From:	Budget and Legislative Analyst's Office
Re:	Large Bank Social Responsibility Screening
Date:	May 19, 2017

Summary of Requested Action

Your office requested that the Budget and Legislative Analyst report on social responsibility measures for the largest U.S. banks. Specifically, you requested that we report on (1) the gender and racial/ethnic composition of the banks' boards of directors; (2) lending practices; and (3) bank financing of the following: civilian firearms, tobacco, nuclear power, the Dakota Access Pipeline, and private prisons.

For further information about this report, contact Fred Brousseau at the Budget and Legislative Analyst's Office.

Executive Summary

- Thirteen large banks were identified for this analysis of their performance against various social responsibility measures and their financing role in the Dakota Access Pipeline and the civilian firearms, tobacco, nuclear power and private prison industries.
- Eleven of the banks were selected for this analysis from the largest in the U.S., each with assets of $200 billion or more. Two additional banks were selected with assets under $200 billion, but with significant shares of the deposit market in California. Of the thirteen banks analyzed, seven participated in the Request for Proposal process for Banking & Payment Services for the City and County of San Francisco in 2012.
- The review of the performance of the thirteen analyzed banks measured against various social responsibility indicators showed that, overall, the banks performed worse than comparison benchmark institutions in the majority of cases. Specifically, the banks' performance was measured in the areas of:
    1. Board of directors diversity
    2. Percentage of loans made to small businesses
    3. Percentage of home loans to borrowers of color, low-income borrowers, and low-income neighborhoods

4. Percentage of loans for community development purposes such as affordable housing, community services, and economic development activities

5. Adoption of practices to limit the impact on low income customers of overdraft policies

Benchmark institutions for comparison to the thirteen banks varied by measure and consisted of all financial institutions, all large banks, or those with at least $1 billion in assets, all Fortune 500 companies, or for one measure where comparison data was not available from regulatory agencies, the aggregate results for the thirteen banks themselves.

- The results of our analysis of the thirteen banks' performance on various social responsibility measures are presented in Exhibit A.
- As shown in Exhibit A, the best results for the thirteen banks analyzed were achieved by two banks that exceeded the benchmark institutions' performance in five out of the eight measures evaluated. The remaining eleven banks only exceeded the benchmark institutions' performance on half of the measures or fewer.
- Measures for which a majority of the thirteen banks analyzed exceeded the benchmark institutions were on implementing best overdraft practices and making home loans to borrowers of color.
- Areas where the thirteen banks were below the benchmarks most frequently were in making home loans in low-income neighborhoods, making home loans to low-income borrowers, and making loans to small businesses.

Exhibit A: 13 Banks' Performance on Social Responsibility Measures Relative to Benchmarks

(✓ = bank scored above benchmark)

Bank name	Board of directors		Small business loans	Home loans			Community Development loans	Overdraft practices	Total measures above benchmark (out of 8)
	Female board members (%)	Board member of color (%)	% of total business loans	Borrowers of color (%)	Low-income borrowers (%)	Low-income neighbor-hood (%)	% of total loans	Pew best practices	
Benchmark	Fortune 500	Fortune 500	All large banks*	All instns.	All instns.	All instns.	Median of 13 banks	45 largest banks	
Benchmark value	20%	15%	15.3%	19.9%	28%	13.5%	0.8%	0.85	
Bank of America	✓	✓		✓				✓	**4**
Bank of the West	not available	not available	✓				✓	✓	**3**
BB&T		✓	✓				✓	✓	**4**
Capital One	not available	not available		✓			✓		**2**
Citibank	✓	✓		✓			✓	✓	**5**
HSBC	not available	not available		✓				✓	**2**
JPMorgan Chase				✓				✓	**2**
PNC	not available	not available			✓	✓			**2**
SunTrust	not available	not available					✓		**1**
TD Bank	✓	not available			✓	✓	✓		**4**
U.S. Bank	✓	✓	✓		✓			✓	**5**
Union Bank	✓	✓		✓			✓		**4**
Wells Fargo	✓	✓		✓				✓	**4**
Total	**6**	**6**	**3**	**7**	**3**	**2**	**7**	**8**	

*Large banks are those with at least $1 billion in assets.

- Filings with the U.S. Securities and Exchange commission show that the thirteen banks analyzed and their affiliates have all been active in financing one or more of the industries or business entities shown in Exhibit B. Each industry was analyzed based on the records of the top two or three publicly traded companies for each industry.

- The Dakota Access Pipeline is an entity, not an industry, owned by a consortium of companies including Energy Transfer Partnerships, Sunoco Logistic Partners, and Phillips 66, among others.
- Financing provided by the thirteen banks and their affiliates included in this analysis were lines of credit, loans and bond financings.

Exhibit B: Industries and Business Entities Receiving Financing from 13 Analyzed Banks, 2010-2017

Bank Name	**Civilian Firearms**	**Tobacco**	**Nuclear Power Companies**	**Dakota Access Pipeline**	**Private Prison**	**Total Industries/ Entities Financed**
Bank of America	✕		✕	✕	✕	*4*
Bank of the West	✕		✕	✕	✕	*4*
BB&T	✕		✕			*2*
Capital One	✕					*1*
Citibank		✕	✕	✕		*3*
HSBC		✕	✕	✕	✕	*4*
JPMorgan Chase	✕	✕	✕	✕	✕	*5*
PNC	✕	✕	✕	✕	✕	*5*
SunTrust			✕	✕	✕	*3*
TD Bank	✕		✕	✕	✕	*4*
U.S. Bank	✕	✕	✕	✕	✕	*5*
Union Bank			✕	✕		*2*
Wells Fargo	✕	✕	✕	✕	✕	*5*

Project staff: Fred Brousseau, Christina Malamut, and Mina Yu

Overview

This report first presents social responsibility indicators related to bank practices and policies in five areas: (1) board of directors' gender and racial/ethnic diversity; (2) small business loans; (3) home loans to borrowers of color and low-income borrowers; (4) community development loans; and (5) overdraft policies for bank customers with checking accounts. Indicators were selected based on the Socially Responsible Banking & Payment Services Questions from the City and County of San Francisco's 2012 Request for Proposals (RFP) for Banking & Payment Services, as well as data availability. The second section provides information on bank financing of the following: civilian firearms, tobacco, nuclear power, the Dakota Access Pipeline, and private prisons.

The report reviews practices and financing at thirteen large banks, shown below in Exhibit 1. The banks include eleven of the thirteen banks[1] in the U.S. with more than $200 billion in assets, as well as two other large banks—Bank of the West and Union Bank—that have a considerable share of the deposit market in California (3.2 percent and 6.2 percent respectively) though their total assets are each less than $200 billion. Seven of the thirteen banks participated in the City's most recent RFP for Banking & Payment Services.[2] The City currently contracts with two of the banks for banking and payment services—Bank of America and U.S. Bank.

A bank is a financial institution that is licensed to make loans and receive deposits. This report's assessment of bank performance relative to various social responsibility measures focuses on commercial banks, which make loans to individuals and businesses, manage withdrawals, and receive deposits.[3] A bank holding company (BHC) controls one or more banks and typically owns multiple bank subsidiaries, as well as nonbanking entities that are engaged in activities such as securities dealing and underwriting, private equity, real estate, insurance, asset management, etc.[4] For example, Bank of America Corporation is a financial holding company[5] that owns the commercial bank, Bank of America[6]. In our analysis of bank performance relative to social responsibility indicators, we assess

[1] Bank of New York Mellon and State Street Bank and Trust Company were not included in this report because they do not offer retail banking services.
[2] Bank of San Francisco also participated in the most recent RFP but was not included in this report due to its size.
[3] Investment banks provide services such as underwriting and assisting with mergers and acquisitions for corporate clients.
[4] Avraham, Dafna, Selvaggi, Patricia, and Vickery, James. "A Structural View of U.S. Bank Holding Companies." The Federal Reserve Bank of New York Economic Policy Review. July 2012.
[5] Most BHCs are registered as financial holding companies (FHCs) which allow them to engage in financial activities such as securities underwriting and dealing, merchant banking activities, and insurance underwriting.
[6] Formally known as "Bank of America, National Association"

banks only since they are the entities most involved in making loans and other retail banking practices. In our analysis of financing of businesses in selected industries, we focus more broadly on commercial banks and their affiliates, such as bank subsidiaries or other entities owned by the same financial holding company, each explicitly identified.

Exhibit 1: 13 Banks Covered in this Report

Bank name	Assets (Mil $)	CA deposit market share (%)	Branches in SF	Participated in 2012 CCSF Banking Services RFP
Bank of America	$1,659,793	21.7%	42	Yes
Bank of the West	82,567	3.2	11	Yes
Branch Banking & Trust (BB&T)	217,378	0.0	0	
Capital One	279,255	0.0	0	
Citibank	1,356,393	4.2	25	Yes
HSBC	203,705	0.8	3	
JPMorgan Chase	2,118,497	9.4	42	Yes
PNC	357,859	0.0	0	
SunTrust	200,201	0.0	0	
TD Bank	264,438	0.0	0	
U.S. Bank	448,401	2.8	13	Yes
Union Bank	116,912	6.2	6	Yes
Wells Fargo	1,740,819	19.5	43	Yes

Source: Federal Reserve (assets), Federal Deposit Insurance Corporation (FDIC) (market share and branches); San Francisco Treasurer & Tax Collector (RFP participation)

1. Bank Practices Relative to Social Responsibility Indicators

This section presents data on social responsibility indicators related to board of directors' gender and racial/ethnic diversity, small business loans, home loans to borrowers of color and low-income borrowers, community development loans, and overdraft policies for bank customers with checking accounts. Specifically, we present data on eight indicators:

1. Percent of board of directors' members that are female
2. Percent of board of directors' members that are persons of color
3. Percent of total business loans that are small business loans, defined as loans with original amounts of $1.0 million or less, regardless of business size
4. Percent of home loans to borrowers of color
5. Percent of home loans to low-income borrowers
6. Percent of home loans that are for properties in low-income neighborhoods
7. Percent of total loans that are community development loans, defined in the Community Reinvestment Act of 1997 as loans that provide financing for the following: (1) affordable housing (including multifamily rental housing) for low-or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) activities that promote economic development by financing small businesses or farms; or (4) activities that revitalize or stabilize low- or moderate-income geographies
8. Number of banking best practices in which the bank engages as identified in a Pew Charitable Trusts study, to minimize overdraft fees.

For each indicator, we compare the performance of the thirteen banks to each other as well as a relevant benchmark (e.g. the performance of all large banks).

Board of Directors Diversity

This section describes the racial/ethnic and gender diversity of the boards of directors at the banks analyzed in this report and compares board diversity at these banks with that of all Fortune 500 companies. Some banks publish demographic information for their boards of directors in their annual proxy statements, while others do not. We gathered demographics data from the banks' annual proxy statements (when possible) as well as published studies and reports. However, gender diversity data was not available for five banks and racial/ethnic diversity data was not available for six banks. Board diversity data and sources are described in Exhibit 2 below.

Exhibit 2: Board of Directors Diversity, 13 Analyzed Banks

Bank name	Percent female	Percent persons of color	Source	Year
Benchmark: All Fortune 500 companies	20%	15%	Deloitte report[7]	2016
Bank of America	29%	21%	Annual proxy statement	2016
BB&T	17%	22%	UNC study[8]	2015
Citibank	27%	20%	Annual proxy statement	2016
JPMorgan Chase	18%	9%	Greenlining Institute report[9]	2012
TD Bank	36%	*not available*	Annual proxy statement	2016
U.S. Bank	29%	21%	Deloitte report	2016
Union Bank	23%	62%	Greenlining Institute report	2012
Wells Fargo	33%	27%	Annual proxy statement	2016
Bank of the West	*not available*	*not available*		
Capital One	*not available*	*not available*		
HSBC	*not available*	*not available*		
PNC	*not available*	*not available*		
SunTrust	*not available*	*not available*		
Median: 13 Analyzed Banks	28%	21%		

In 2016, female board members represented just 20 percent of all boards of directors' members at Fortune 500 companies.[10] With a median of 28 percent female board members, six of the 13 large banks reviewed with available data had greater female representation on their boards of directors compared to Fortune 500 companies in aggregate: Bank of America, Citibank, TD Bank, U.S. Bank, Union Bank, and Wells Fargo. JPMorgan Chase and BB&T had less female representation on their boards compared to Fortune 500 companies—female board members made up 18 and 17 percent, respectively, of all board members. TD Bank and

[7] Deloitte, Catalyst, Diversified Search, The Executive Leadership Council, the Hispanic Association on Corporate Responsibility, and Leadership Education for Asian Pacifics, Inc. "Missing Pieces Report: The 2016 Board Diversity Census of Women and Minorities on Fortune 500 Boards." February 6, 2017.

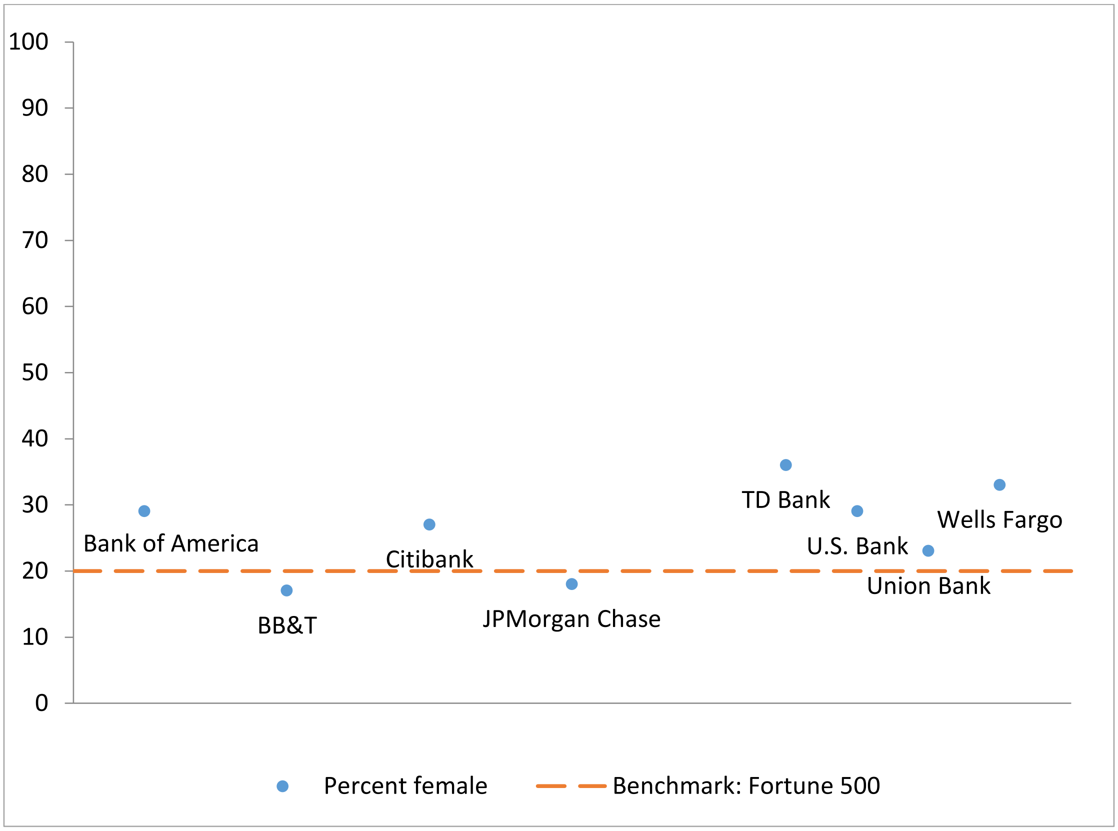
[8] Director Diversity Initiative at University of North Carolina-Chapel Hill School of Law. *North Carolina Corporate Board Diversity 2015 Survey*. June 2016. <https://ddi.law.unc.edu/boarddiversity/>

[9] Vissa, Preeti. The Greenlining Institute. "Annual Bank Board Diversity Report 2012." February 2013. <http://greenlining.org/wp-content/uploads/2013/03/GI-BBD-layout-to-post.pdf>

[10] Deloitte, Catalyst, Diversified Search, The Executive Leadership Council, the Hispanic Association on Corporate Responsibility, and Leadership Education for Asian Pacifics, Inc. "Missing Pieces Report: The 2016 Board Diversity Census of Women and Minorities on Fortune 500 Boards." February 6, 2017.

Wells Fargo had the largest percentage (36 and 33 percent respectively) of female board members, as shown in Exhibit 3 below.

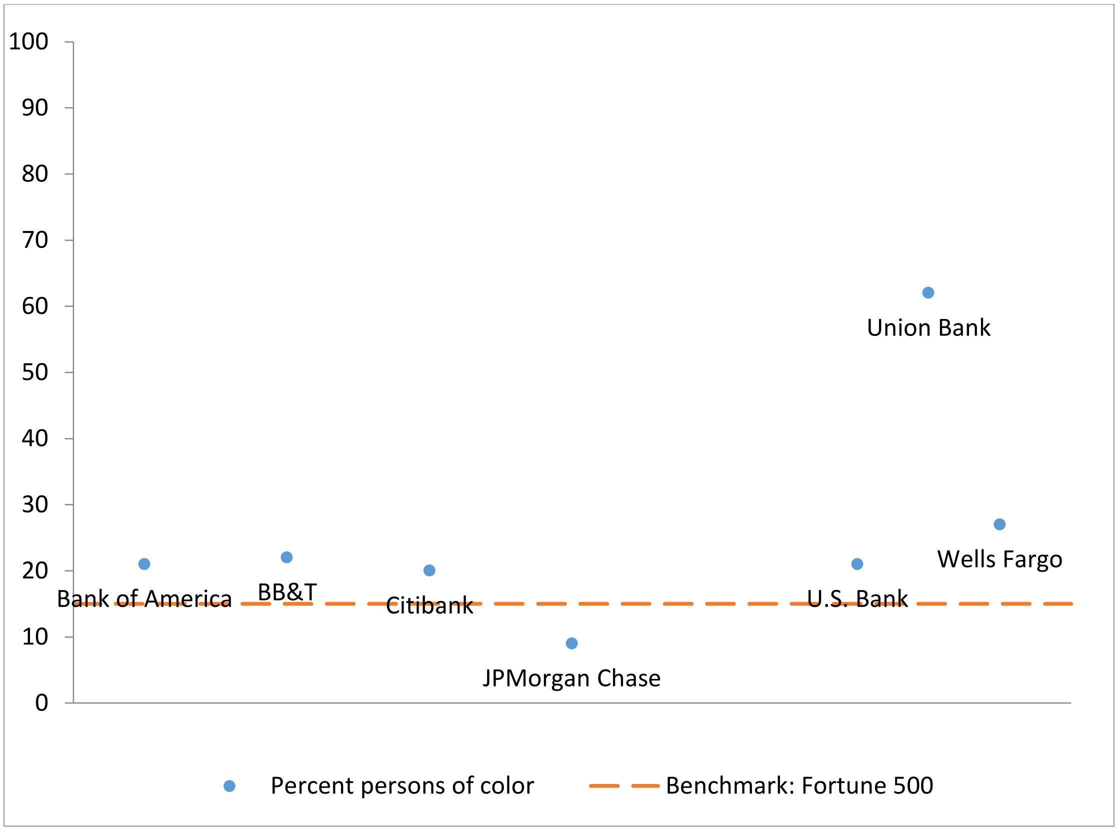
Exhibit 3: Board of Directors, Percent Female, 13 Analyzed Banks



Source: Annual proxy statements and reports described in Exhibit 2

In 2016, persons of color represented just 15 percent of all boards of directors' members at Fortune 500 companies. Six banks with available data had greater representation of persons of color on their boards of directors compared to Fortune 500 companies in aggregate: Bank of America, BB&T, Citibank, U.S. Bank Union Bank, and Wells Fargo. JPMorgan Chase had less representation of persons of color on their boards compared to Fortune 500 companies—persons of color represented nine percent of all board members. Union Bank had the largest percentage (62 percent) of persons of color among all board members, followed by Wells Fargo (27 percent), as shown in Exhibit 4 below.

Exhibit 4: Board of Directors, Percent Persons of Color, 13 Analyzed Banks



Source: Annual proxy statements and reports described in Exhibit 2

Small Business Loans

Small business loans are defined as business loans[11] whose original amounts are $1.0 million or less, regardless of business size. In this section, we describe small business lending nationally in terms of number of loans and total amounts of loans using data from the Federal Deposit Insurance Corporation (FDIC) Call Reports for December 2016. We compare the banks' small business loans as a percentage of their total business loans to that of all large banks—defined as banks with at least $1.0 billion in assets at the end of 2016—based on previously

[11] Business loans include: (1) loans secured by nonfarm or nonresidential real estate; and (2) commercial and industrial loans.

established methodology.[12] Data on small business loans in the City and County of San Francisco can be found in the Appendix.

As of December 2016, the thirteen banks analyzed had a total of 10.9 million small business loans outstanding for a total of $152.4 billion in loans. This represented 10.8 percent of their total business loans, lower than the 15.3 percent rate for all large banks. Bank of America had the most small business loans outstanding (3.2 million), and Wells Fargo had the largest small business loan amount outstanding ($36.9 billion), as shown in Exhibit 5 below. Median amounts for the thirteen analyzed banks are also presented, again showing a lower rate of small business loans, at 12.5 percent, compared to the 15.3 percent benchmark rate for all large banks.

[12] Williams, Victoria. "Small Business Lending in the United States 2010-2011." Office of Advocacy of the U.S. Small Business Administration (SBA). July 2012.

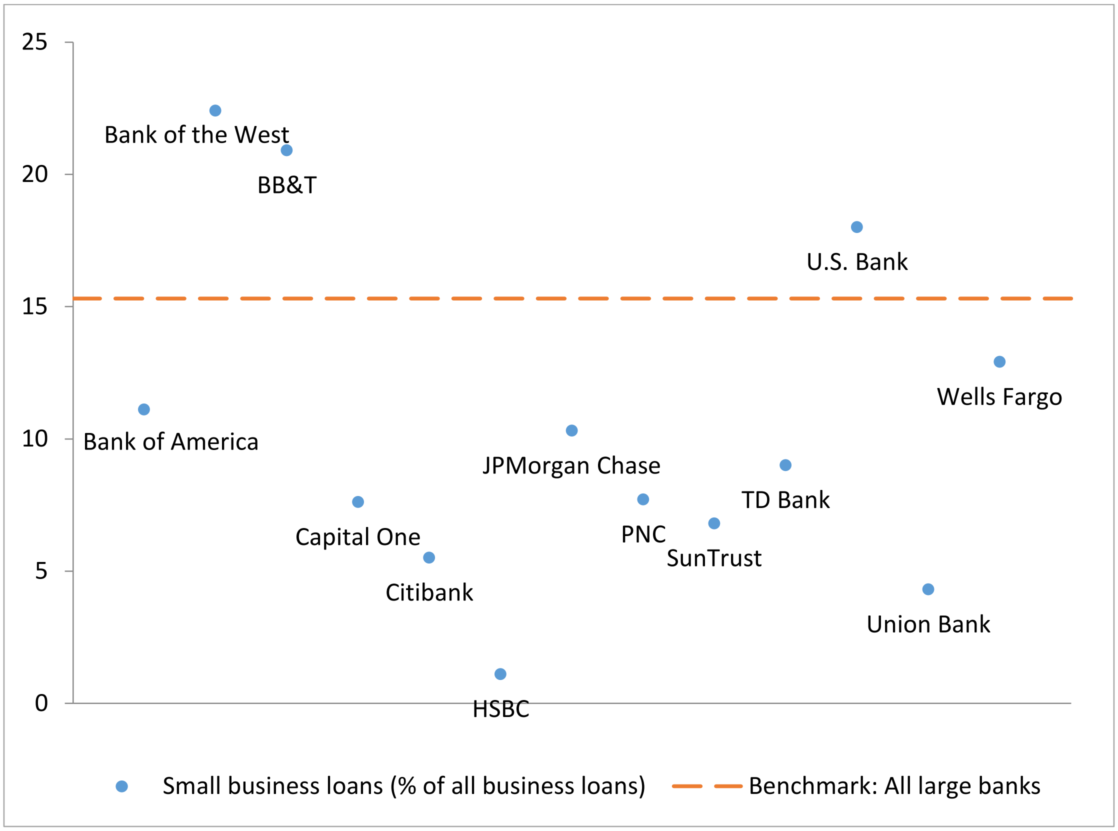
Exhibit 5: Total Number of Small Business loans, 13 Analyzed Banks, December 2016

Bank name	Small business loans: Number of loans outstanding	Small business loans: Amount (000s)	Total business loans (000s)	Percent small business loans
Benchmark: All large banks*	22,871,920	$448,991,608	$2,938,681,321	15.3%
Bank of America	3,154,206	$33,988,000	$305,938,000	11.1%
Bank of the West	42,290	$5,305,879	$23,660,872	22.4%
BB&T	364,185	$11,254,517	$53,740,739	20.9%
Capital One	290,739	$2,975,807	$39,095,368	7.6%
Citibank	2,410,849	$8,376,000	$151,364,000	5.5%
HSBC	2,929	$429,013	$37,465,555	1.1%
JPMorgan Chase	2,151,629	$19,282,000	$186,743,000	10.3%
Union Bank	153,294	$1,258,916	$29,085,090	4.3%
PNC	254,749	$7,217,815	$93,999,842	7.7%
SunTrust	32,706	$3,892,024	$57,642,410	6.8%
TD Bank	74,664	$4,664,744	$51,652,740	9.0%
U.S. Bank	1,099,082	$16,776,329	$92,964,332	18.0%
Wells Fargo	898,199	$36,962,000	$287,074,000	12.9%
Total: 13 Analyzed Banks	10,929,521	$152,383,044	$1,410,425,948	10.8%
Median: 13 Analyzed Banks	290,739	$7,217,815	$57,642,410	12.5%

Source: FDIC Call Reports, December 31, 2016
*All large banks are defined as those with assets of $1 million or more.

Small business loans made up a larger share of total business loans at three of the banks analyzed compared to all large banks—Bank of the West (22.4 percent), BB&T (20.9 percent), and U.S. Bank (18.0 percent). Small business loans made up a smaller share of total business loans at the remaining ten banks analyzed compared to all large banks. HSBC had the smallest share of small business loans as a percentage of total business loans in the group (1.1 percent). As shown in Exhibit 6, most of the thirteen analyzed banks were below the benchmark 15.3 percent small business loan rate for all large banks.

Exhibit 6: Small Business Loans, Percent of Total Business Loans, 13 Analyzed Banks, 2016



Source: Budget and Legislative Analyst calculation based on data from FDIC Call Reports, December 31, 2016
Note: The benchmark all large banks are those with assets of $1 billion or more.

Home Loans to Borrowers of Color and Low-Income Borrowers

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activity each year, including demographic information about loan applicants and census-tract designations of properties related to those loans. The Federal Reserve publishes an annual report based on HMDA data on residential mortgage lending demographics by institution type and provides institution level details for the top 25 mortgage lenders. Eight of the thirteen banks analyzed in this report are among the top 25 mortgage lenders. We pulled data from this Federal Reserve report and analyzed HMDA data for the remaining five banks, using the same methodology, and present three statistics in this section on home-purchase loan originations in 2015 for one-to-four family properties: (1) the percent of loans to borrowers of color; (2) the percent of loans to low-income borrowers; and (3) the percent of loans to low-income neighborhoods. We compare these measures for individual banks with those at all mortgage lending institutions and at all large banks, for which aggregate records are available from the Federal Reserve report.

The thirteen banks analyzed made a total of 382,000 home-loans in 2015, and this represents approximately 12.2 percent of all home-loan originations in 2015. Originations and borrower demographic information are shown in Exhibit 7 below.

As can be seen in Exhibit 7, as a group, the thirteen analyzed banks made lower percentages of their loans to low income borrowers, with a median rate of 18.5 percent, than all large banks, at 23.7 percent, and all institutions, at 28 percent.

For loans to low-income neighborhoods, the thirteen banks analyzed were comparable to all large banks, with a median of 11.7 percent of their total loans going to low-income neighborhoods compared to 11.8 percent for all large banks, but had lower rates of such loans when compared to the 13.5 percent rate for all mortgage lending institutions.

Exhibit 7: Home-Loan Originations by Race/Ethnicity and Income, 13 Analyzed Banks, 2015

Bank Name	Number of originations	Percent non-Hispanic white borrower	Percent borrower of color[13]	Percent race missing or joint[14]	Percent low-income borrower[15]	Percent low-income neighborhood[16]
Benchmark: All mortgage-lending institutions	3,124,000	68.1%	19.9%	12.0%	28.0%	13.5%
All large banks	929,000	69.6%	17.9%	12.5%	23.7%	11.8%
Bank of America*	47,000	61.5%	28.5%	10.0%	18.5%	11.3%
Bank of the West	2,000	70.5%	17.2%	12.3%	20.3%	10.8%
BB&T*	19,000	69.6%	10.8%	19.6%	26.9%	12.5%
Capital One	4,000	56.4%	24.0%	19.6%	26.9%	12.9%
Citibank*	22,000	43.8%	30.9%	25.3%	12.4%	13.3%
HSBC	1,000	24.8%	27.3%	47.9%	9.9%	10.8%
JPMorgan Chase*	56,000	63.8%	21.2%	15.0%	13.5%	8.8%
PNC*	20,000	62.9%	15.2%	21.9%	34.8%	14.4%
SunTrust*	15,000	63.0%	16.9%	20.1%	17.9%	10.4%
TD Bank	4,000	72.1%	15.9%	12.0%	32.7%	19.3%
U.S. Bank*	32,000	68.6%	12.1%	19.3%	28.3%	11.7%
Union Bank	4,000	51.5%	29.0%	19.5%	6.9%	12.6%
Wells Fargo*	156,000	67.1%	20.6%	12.3%	18.5%	11.3%
Median: 13 analyzed banks	19,000	63.0%	20.6%	19.5%	18.5%	11.7%

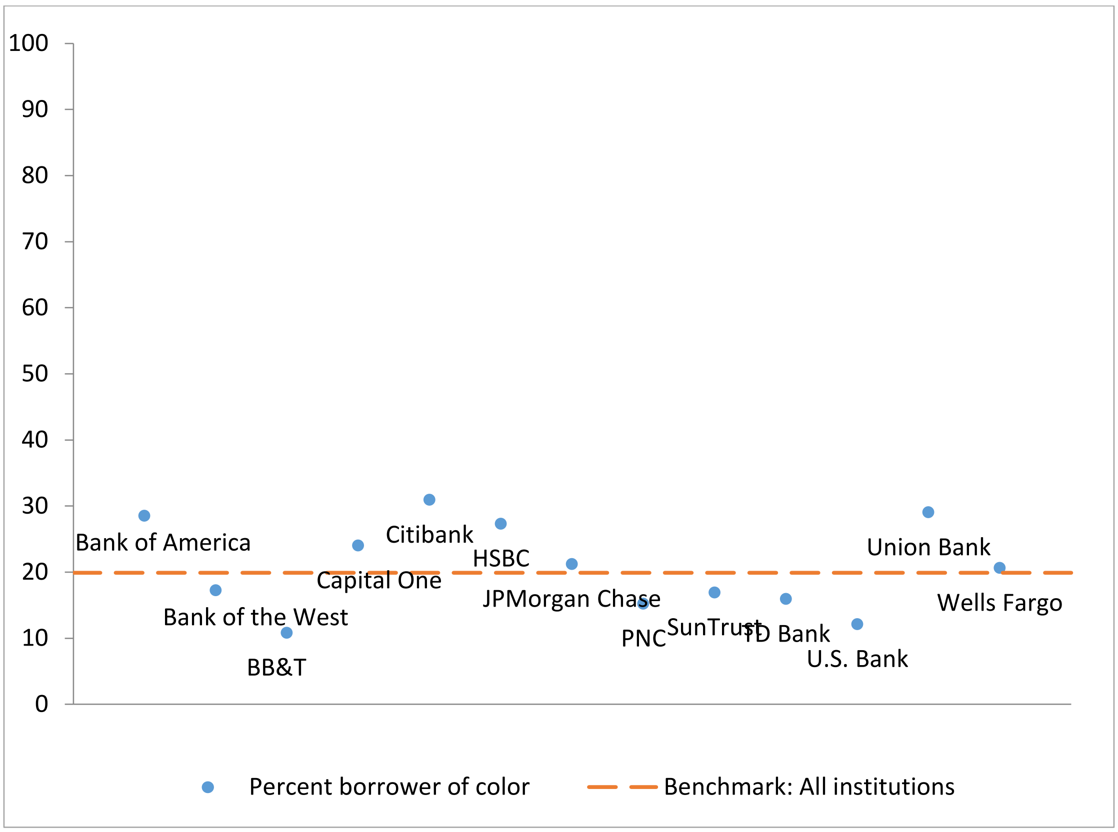
Source: Bhutta, Neil and Ringo, Daniel R. Federal Reserve Division of Research and Statistics. "Residential Mortgage Lending from 2004 to 2015: Evidence from the Home Mortgage Disclosure Act Data." Federal Reserve Bulletin Vol. 102, No. 6. November 2016; and Budget and Legislative Analyst calculations based on 2015 HMDA data.
*Top 25 lender in terms of total originations

[13] Borrowers of color include applicants that self-reported identifying as one or more of the following: Asian, Black or African American, Hispanic white, American Indians or Alaska Natives, Native Hawaiians or other Pacific Islanders.
[14] "Missing" refers to applications in which the race and/or ethnicity of the applicant(s) has not been reported. "Joint" refers to applications in which one applicant was non-Hispanic white and the other was a borrower of color.
[15] Low-income borrowers have income that is less than 80 percent of Area Median Family Income (AMFI).
[16] Low-income neighborhoods are census tracts with median family income that is less than 80 percent of AMFI.

Borrowers of color

Home loans to borrowers of color represented 19.9 percent of total home loans at all mortgage lending institutions. With a median rate of 20.6 percent, the thirteen analyzed banks were slightly above the rate for all mortgage-lending institutions and higher than all large banks, which had a lending rate to borrowers of color of 17.9 percent in 2015. Citibank made the largest percentage (30.9 percent) of loans to borrowers of color, and BB&T made the smallest percentage (10.8 percent) of loans to borrowers of color, as shown in Exhibit 8 below.

Exhibit 8: Percent of Home Loans to Borrowers of Color, 13 Analyzed Banks, 2015



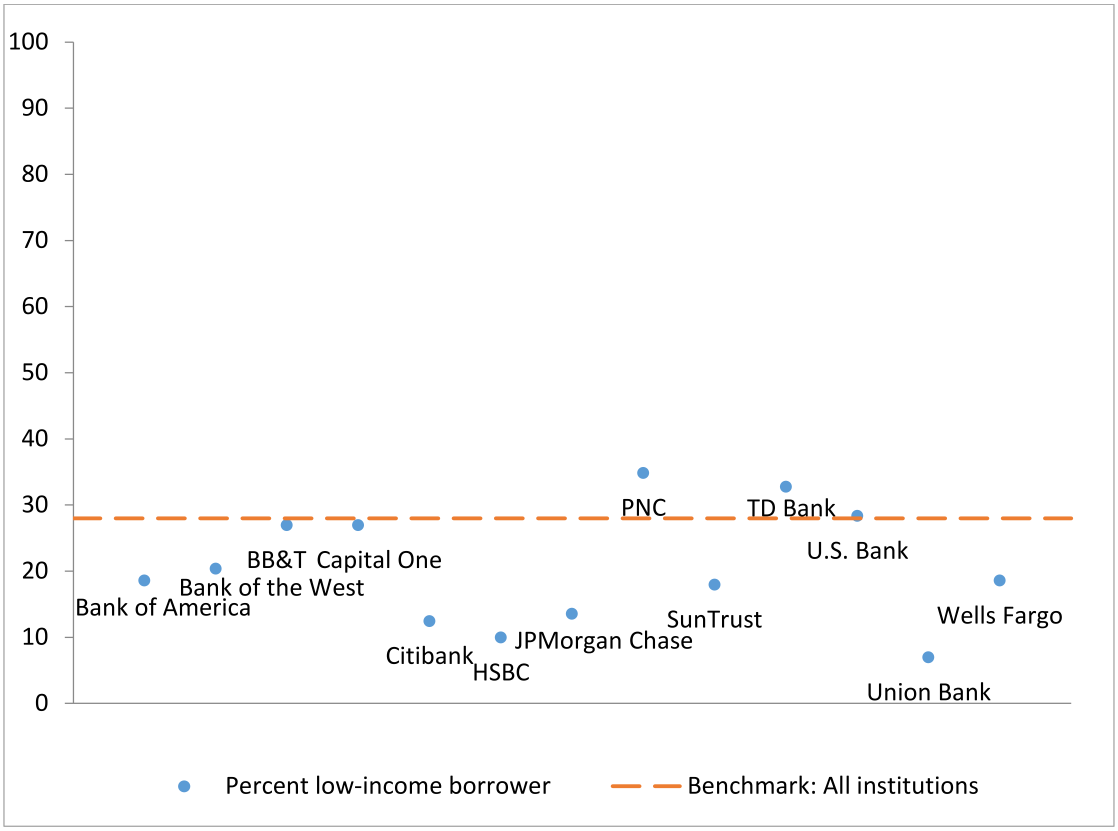
Source: Federal Reserve; Budget and Legislative Analyst Calculations based on 2015 HMDA data

Low-income borrowers

Home loans to low-income borrowers represented 28 percent of total home loans at all mortgage lending institutions but a median rate of only 18.5 percent for the thirteen banks analyzed. PNC and TD Bank made the largest percentage (34.9 and

32.7 percent respectively) of loans to low-income borrowers, and Union Bank made the smallest percentage (6.9 percent) of loans to low-income borrowers, as shown in Exhibit 9 below.

Exhibit 9: Percent of Home Loans to Low-Income Borrowers, 13 Analyzed Banks, 2015

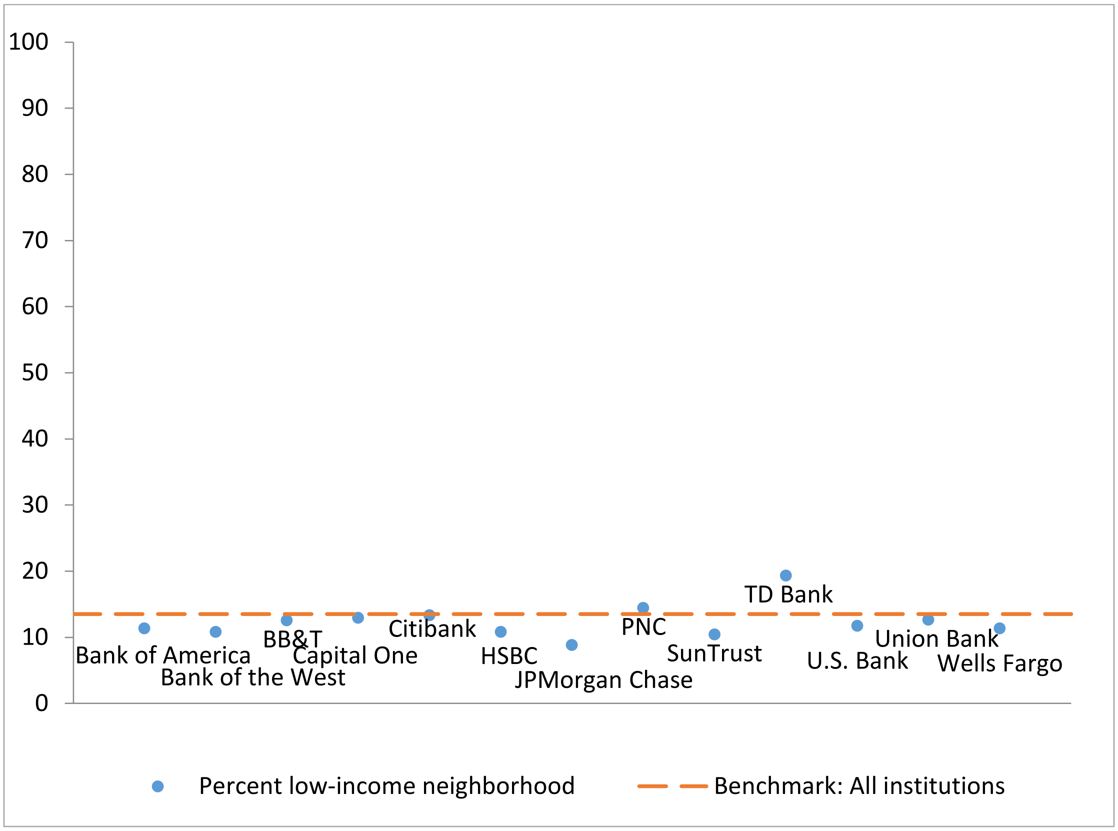


Source: Federal Reserve; Budget and Legislative Analyst calculations based on 2015 HMDA data

<u>Low-income neighborhoods</u>

Home loans for properties located in low-income neighborhoods represented 13.5 percent of total home loans at all mortgage lending institution compared to 11.7 percent at the median for the thirteen banks analyzed. TD Bank made the largest percentage (19.3 percent) of loans to low-income neighborhoods, and JPMorgan Chase made the smallest percentage (8.8 percent) of loans to low-income neighborhoods, as shown in Exhibit 10 below.

Exhibit 10: Percent of Home Loans to Low-Income Neighborhoods, 13 Analyzed Banks, 2015



Source: Federal Reserve; Budget and Legislative Analyst Calculations based on 2015 HMDA data

Community Development Loans

The Community Reinvestment Act of 1997 (CRA)[17] requires that depository institutions report on the number and amount of community development loans originated in a given year. According to CRA regulations, community development is defined as:

- Affordable housing (including multifamily rental housing) for low-or moderate-income individuals;
- Community services targeted to low- or moderate-income individuals;

[17] The CRA, enacted by Congress in 1977, is intended to encourage banks to help meet the credit needs of the communities (including low-or moderate-income neighborhoods) in which they operate.

- Activities that promote economic development by financing small businesses or farms[18]; or
- Activities that revitalize or stabilize low- or moderate-income geographies.

In this section, we identify community development loans originated by the thirteen analyzed banks nationally in terms of number of loans and total amounts of loans, based on CRA reports for 2015. We compare the banks' community development loans as a percentage of total loans to the median of all thirteen banks analyzed.

In 2015, the thirteen banks analyzed originated 5,714 community development loans for a total of $32.9 billion in loans. JPMorgan Chase made the most community development loans (1,514), and Wells Fargo made the largest amount of community development loans ($5.6 billion), as shown in Exhibit 11 below.

Measured as a percentage of total loans, community development loans amounted to a median of 0.8 percent of all loans for the thirteen banks analyzed. As can be seen in Exhibit 11, community development loans were a higher or equal percentage of their total loans for seven of the thirteen banks analyzed; the six other banks analyzed were below that benchmark.

[18] "Small businesses or farms" must: (1) meet the size eligibility standards of the SBA's Development Company or Small Business Investment Company programs (13 CFR 121.301); or (2) have gross annual revenues of $1 million or less

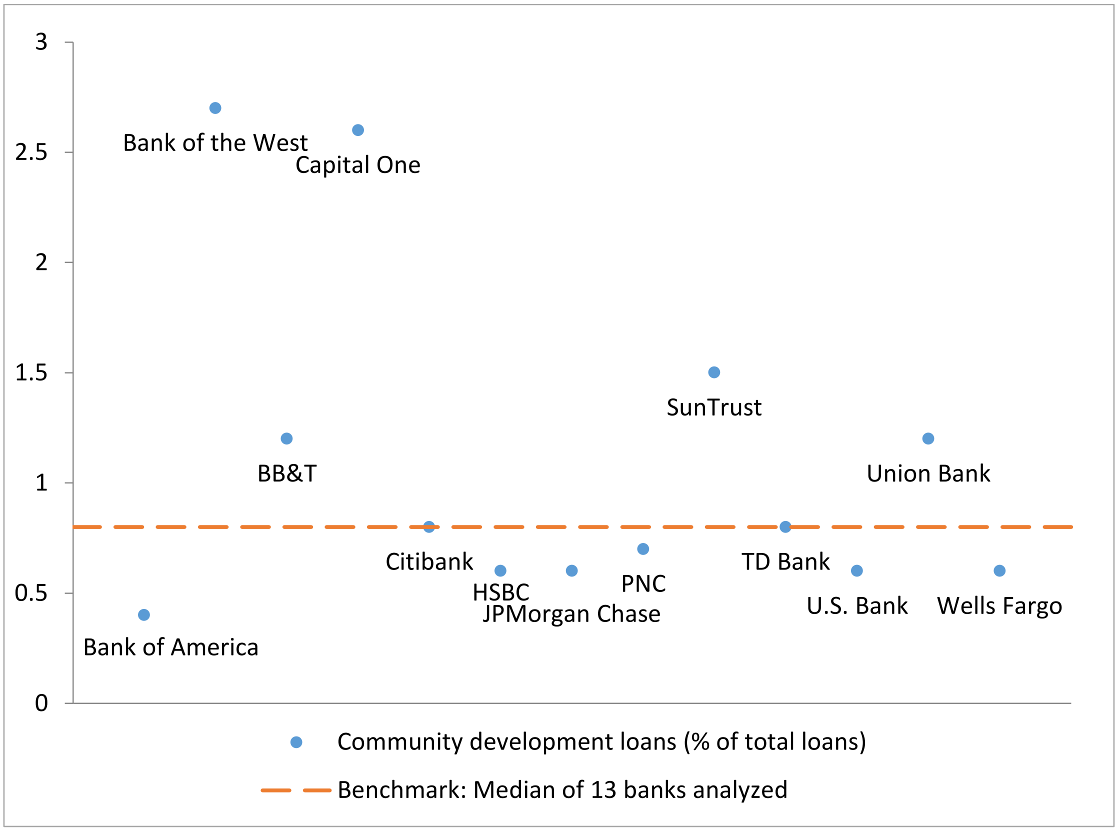
Exhibit 11: Community Development Loans (in $000's), 13 Analyzed Banks, 2015

	Community development loans		Total loans	Percent community development loans
Bank name	Number of loans	Amount (000s)	Amount (000s)	
Median: 13 Analyzed Banks	327	$1,665,216	$152,527,050	0.8%
Bank of America	482	$3,791,799	$879,724,000	0.4%
Bank of the West	327	$1,448,901	$54,524,585	2.7%
BB&T	423	$1,665,216	$133,613,811	1.2%
Capital One	337	$3,971,912	$152,527,050	2.6%
Citibank	344	$4,528,704	$586,959,000	0.8%
HSBC	82	$479,890	$80,297,403	0.6%
JPMorgan Chase	1,514	$4,268,066	$736,185,000	0.6%
PNC	301	$1,412,532	$208,178,144	0.7%
SunTrust	297	$2,061,748	$138,417,245	1.5%
TD Bank	300	$1,033,215	$126,403,506	0.8%
U.S. Bank	249	$1,664,431	$262,999,876	0.6%
Union Bank	257	$944,530	$77,498,682	1.2%
Wells Fargo	801	$5,660,084	4888,911,000	0.6%
Total: 13 Analyzed Banks	5,714	$32,931,028	$4,326,239,302	0.8%

Source: FFIEC, CRA 2015 Disclosure Reports

Community development loans made in 2015 represented a median of 0.8 percent of all outstanding loans (in terms of loan amounts) that year for the thirteen banks analyzed in this report. Bank of the West and Capital One had the largest share of community development loans as a percentage of total loans in the group (2.7 and 2.6 percent, respectively). Bank of America had the smallest share of community development loans as a percentage of total loans in the group (0.4 percent).

Exhibit 12: Community Development Loans, Percent of Total Loans, 13 Analyzed Banks, 2015



Source: FFIEC, CRA 2015 Disclosure Reports

Affordable housing loans are included in the community development loan totals presented above but are not reported separately to bank regulators. Affordable housing loan totals reported by Affordable Housing Finance Magazine (AHF) for the top 25 lenders, including eight of the thirteen analyzed banks (or affiliates thereof), can be found in the Appendix.

Overdraft Policies

Overdraft and transaction ordering processes can result in unexpected fees for bank customers with checking accounts, and customers that incur the most overdraft fees tend to have incomes below the U.S. average.[19] The Pew Charitable

[19] The Pew Charitable Trusts. "Consumers Need Protection from Excessive Overdraft Costs." December 2016. <http://www.pewtrusts.org/~/media/assets/2016/12/consumers_need_protection_from_excessive_overdraft_costs.pdf>

Trusts developed a set of best and good practices that "reduce the incidence of overdrafts and eliminate bank practices that maximize overdraft fees". In 2015, Pew reviewed practices at 45 of the largest 50 banks in the U.S. to determine if the banks engaged in these best and good practices.[20] We present Pew's best practices below and show whether or not the banks analyzed engage in them (Pew's good overdraft practices can be found in the Appendix). We compare the number of best practices each bank engages in with the average number of the 45 large banks in Pew's report.

Exhibit 13: Pew Charitable Trusts' Overdraft Best Practices

Best Practice	Description
No ATM overdrafts	Banks decline ATM withdrawals that would overdraw an account.
No debit point-of-sale overdrafts	Banks decline debit card point-of-sale transactions that would overdraw an account.
No high-to-low transaction reordering	Banks do not reorder transactions from high-to-low value. (Banks can generate more overdraft fees by reordering transactions and processing them from high-to-low value, compared to processing transactions chronologically for example.)

Source: The Pew Charitable Trusts. "Checks and Balances: 2015 update." May 2015.

Of the 45 large banks that Pew reviewed, seven (15.6 percent) do not permit ATM overdrafts, seven (15.6 percent) do not permit debit point-of-sale overdrafts, and 24 (52.2 percent) do not reorder any transactions from high-to-low value. The thirteen banks analyzed had better rates of adherence to the No ATM Overdrafts and No Debit Point-of-Sale Overdraft practices, with 23.3 percent of the banks employing those policies but a worse rate of adherence to the No High-to-Low Transaction Reordering practice, with 46.2 percent of the thirteen banks employing that practice compared to 52.2 percent of the 45 banks reviewed by The Pew Charitable Trusts. Two of the thirteen banks analyzed in this report engage in all three best practices—Citibank and HSBC. Five banks do not engage in any of these best practices—Capital One, PNC, SunTrust, TD Bank, and Union Bank. The remaining banks—Bank of America, Bank of the West, BB&T, JPMorgan Chase, U.S. Bank, and Wells Fargo—engage in one of the best practices each, as shown in Exhibit 14 below.

[20] The Pew Charitable Trusts. "Checks and Balances: 2015 update." May 2015.

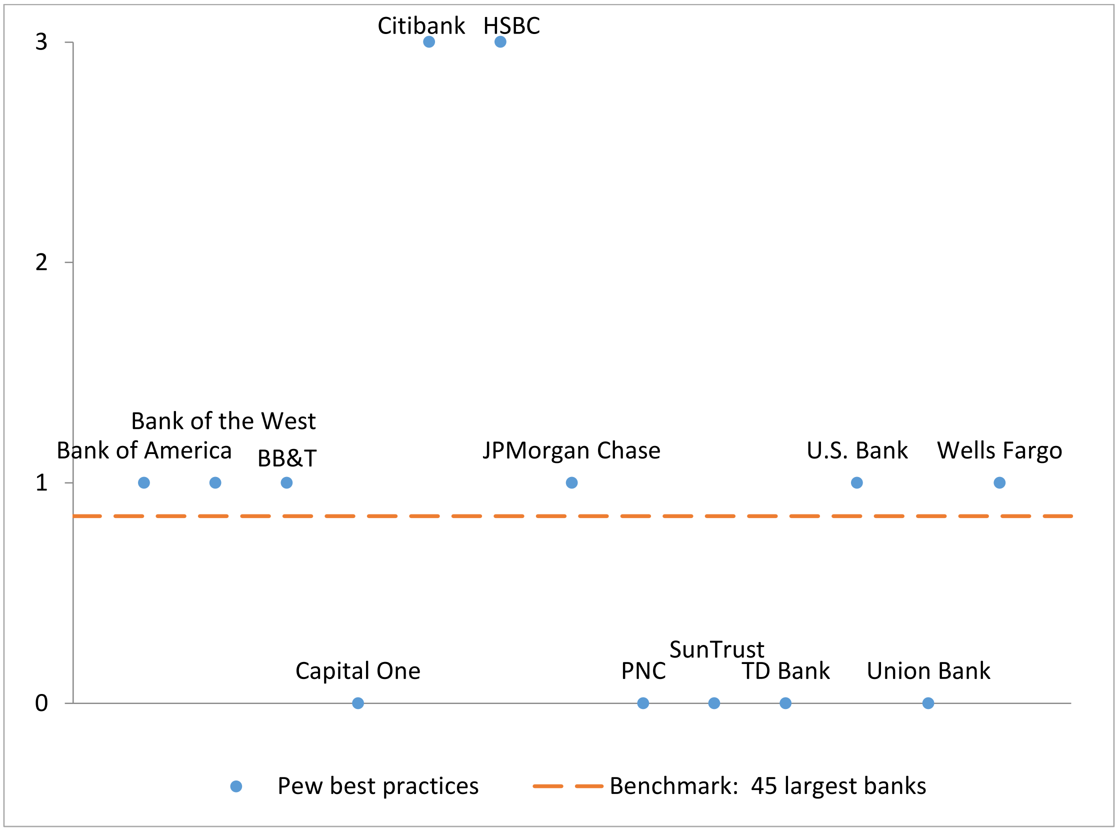
Exhibit 14: Pew Charitable Trusts' Overdraft Best Practices, 13 Analyzed Banks, 2015

Bank Name	No ATM overdrafts	No debit point-of-sale overdrafts	No high-to-low transaction reordering	Total best practices
Benchmark: All 45 banks reviewed	15.6%	15.6%	52.2%	0.85 (avg)
Bank of America		✓		1
Bank of the West			✓	1
BB&T			✓	1
Capital One				0
Citibank	✓	✓	✓	3
HSBC	✓	✓	✓	3
JPMorgan Chase	✓			1
PNC				0
SunTrust				0
TD Bank				0
U.S. Bank			✓	1
Union Bank				0
Wells Fargo			✓	1
Percentage of 13 analyzed banks with best practices	23.1%	23.1%	46.2%	--

Source: The Pew Charitable Trusts. "Checks and Balances: 2015 update." May 2015.

On average, the 45 large banks that Pew reviewed engaged in 0.85 of the three best practices. The eight banks already mentioned that engaged in at least one of the best practices all exceed the average of all 45 banks, and the five banks that did not engage in any of the best practices are below the average.

Exhibit 15: Total Best Overdraft Practices (Out of Three), 13 Analyzed Banks, 2015



Source: The Pew Charitable Trusts. "Checks and Balances: 2015 update." May 2015.

Summary: Social Responsibility Measures

The review of the performance of the thirteen analyzed banks measured against various social responsibility indicators showed that, overall, the banks performed worse than benchmark comparison institutions in the majority of cases. For some measures, however, the thirteen banks had better performance and for others, they were the same or worse.

Measures for which Thirteen Banks Analyzed Exceeded Benchmark Institutions

Eight of the thirteen banks analyzed in this report exceeded the benchmark value (0.85) for number of overdraft best practices, and seven exceeded the benchmark value (19.9 percent) for percent of home loans to borrowers of color. Additionally, most of the banks with data available had higher rates of representation of women and persons of color on their boards of directors compared to all Fortune 500 companies, as shown below in Exhibit 16.

Citibank and U.S. Bank exceeded the benchmark values for the most indicators (5 out of 8), and SunTrust exceeded the benchmark values for the fewest indicators (1 out of 8), but data was not available for SunTrust for two indicators (percent of board of directors' members that are women and percent of board of directors' members that are persons of color). Capital One, HSBC, JPMorgan Chase, and PNC could exceed benchmark values for the same number of indicators as SunTrust or fewer (2 out of 8)—depending on the gender and racial/ethnic composition of their (as well as SunTrust's) boards of directors.

<u>Measures for which Thirteen Banks Analyzed were Lower than Benchmark Institutions</u>

Eleven of the thirteen banks analyzed in this report fell below the benchmark value (13.5 percent) for percent of home loans to low-income neighborhoods. Ten fell below the benchmark value (28 percent) for percent of home loans to low-income borrowers, and ten fell below the benchmark value (15.3 percent) for percent of business loans that are small business loans.

JPMorgan Chase fell below the benchmark values for the most indicators (6 out of 8). However, Capital One, HSBC, PNC, and SunTrust could fall below benchmark values for the same number of indicators as JPMorgan Chase—SunTrust could fall below one more—depending on the gender and racial/ethnic composition of their boards of directors since data on the makeup of these banks boards of directors was not available.

Citibank and U.S. Bank fell below the benchmark values for the fewest indicators (3 out of 8). Bank of the West also fell below benchmark values for three indicators, but data was not available for two indicators (percent of board of directors' members that are women and percent of board of directors' members that are persons of color), as shown below.

Exhibit 16: Bank Practices Above (or Equal to) Benchmark Values

Bank name	Board of directors		Small business loans	Home loans			Community development loans	Overdraft practices	Total measures above benchmark (out of 8)
	Female board members (%)	Board member of color (%)	% of total business loans	Borrowers of color (%)	Low-income borrowers (%)	Low-income neighbor-hood (%)	% of total loans	Pew best practices	
Benchmark	Fortune 500	Fortune 500	All large banks	All instns.	All instns.	All instns.	Median of 13 banks	45 largest banks	
Benchmark value	20	15	15.3	19.9	28	13.5	0.8	0.85	
Bank of America	✓	✓		✓				✓	**4**
Bank of the West	not available	not available	✓				✓	✓	**3**
BB&T		✓	✓				✓	✓	**4**
Capital One	not available	not available		✓			✓		**2**
Citibank	✓	✓		✓			✓	✓	**5**
HSBC	not available	not available		✓				✓	**2**
JPMorgan Chase				✓				✓	**2**
PNC	not available	not available			✓	✓			**2**
SunTrust	not available	not available					✓		**1**
TD Bank	✓	not available			✓	✓	✓		**4**
U.S. Bank	✓	✓	✓		✓			✓	**5**
Union Bank	✓	✓		✓			✓		**4**
Wells Fargo	✓	✓		✓				✓	**4**
Total	**6**	**6**	**3**	**7**	**3**	**2**	**7**	**8**	

2. Bank Financing of Other Industries/Entities

This section reports on financing of the following industries and business entities by the thirteen large banks analyzed for this report: civilian firearms, tobacco, nuclear power, the Dakota Access Pipeline, and private prisons. As shown in Exhibit 17 below, all thirteen banks in our study finance major public companies in the industries or entities examined.

Exhibit 17: Bank Financing of Major Public Companies in Selected Industries or Entities Examined, 2010-2017

Bank Name	Civilian Firearms	Tobacco	Nuclear Power Companies	Dakota Access Pipeline	Private Prisons	Total Number of Industries Financed
Bank of America	✕		✕	✕	✕	*4*
Bank of the West	✕		✕	✕	✕	*4*
BB&T	✕		✕			*2*
Capital One	✕					*1*
Citibank		✕	✕	✕		*3*
HSBC		✕	✕	✕	✕	*4*
JPMorgan Chase	✕	✕	✕	✕	✕	*5*
PNC	✕	✕	✕	✕	✕	*5*
SunTrust			✕	✕	✕	*3*
TD Bank	✕		✕	✕	✕	*4*
U.S. Bank	✕	✕	✕	✕	✕	*5*
Union Bank			✕	✕		*2*
Wells Fargo	✕	✕	✕	✕	✕	*5*

Sources: U.S. Securities and Exchange Commission 10-K, 10-Q, 8-K, and 424 filings

Methods

Public companies in the industries and entities requested for review were selected based on market leadership, measured in sales production. For the selected companies, we reviewed U.S. Securities and Exchange Commission (SEC) Form 10-Ks from 2010 through 2017, the most recent Form 10-Qs, relevant Form 8-Ks, and all Form 424s available.

The SEC requires that Form 10-K reports be filed annually. These reports provide a comprehensive overview of a company's business and financial condition and include audited financial statements. The Form 10-Q is a quarterly filing required by the SEC that includes unaudited financial statements and provides a continuing view of the company's financial position during the year. Form 8-K is the "current report" companies must file with the SEC to announce major events that shareholders should know about. The 424 is the prospectus form that a company must file if it has made significant changes to a previously-filed prospectus submitted as part of its registration statement. These required filings contain details on company financing sources including identification of financial institutions that provide lines of credit, loans and bond financing.

Civilian Firearms

The Bureau of Alcohol, Tobacco, Firearms and Explosives reported 9.1 million firearms manufactured domestically in 2014.[21] Mother Jones magazine reported on the 10 largest gun manufacturers that produce the majority of firearms in the United States.[22] The three largest public civilian firearms domestic producers according to that article are Sturm Ruger, which manufactured 1.64 million firearms in 2014; Savage (Vista Outdoor), which produced 639,000 firearms in 2014; and Smith & Wesson (American Outdoor Brands Corporation), which produced 1.31 million firearms in 2014. Exhibit 18 below shows the banks financing these three civilian firearms producers, by financing type.

[21] "ATF Releases Annual Firearms Manufacturers and Export Report." Bureau of Alcohol, Tobacco, Firearms and Explosives. February 22, 2016. < https://www.atf.gov/news/pr/atfreleasesannualfirearmsmanufacturersandexportreport>

[22] Josh Harkinson. "Fully Loaded" Mother Jones. April 2016 < http://www.motherjones.com/politics/2016/04/fullyloadedtenbiggestgunmanufacturersamerica>

Exhibit 18: Bank Financing of Major Civilian Firearms Producers, 2010-2017

	Sturm Ruger	**Savage**			**Smith & Wesson**	
Bank Name	***Revolving Credit Line***	***Revolving Credit Line***	***Term Loans***	***Bonds***	***Revolving Credit Line***	***Term Loan***
Bank of America	×	×*	×*			
Bank of the West		×	×			
BB&T		×	×		×	×
Capital One		×	×			
Citibank						
HSBC						
JPMorgan Chase		×	×			
PNC		×	×			
SunTrust						
TD Bank					×	×
U.S. Bank		×	×	×		
Union Bank						
Wells Fargo		×*	×*		×	×*

Sources: U.S. Securities and Exchange Commission 10-K, 10-Q, 8-K, and 424 filings
*Indicates affiliate entity

Sturm Ruger

Bank of America N.A. provided a revolving line of credit to Sturm Ruger of $25 million in 2007,[23] which was increased to $40 million in 2013.[24]

Savage (Vista Outdoor)

Bank of America provided a secured term loan of $350 million to Savage in 2014. In 2016, Savage received a secured loan in the amount of $640 million and a revolving credit line up to $400 million from the following institutions or their affiliates in our study: Merrill Lynch, Pierce, Fenner & Smith Incorporated[25], Bank of the West, BB&T, Capital One, N.A., JP Morgan Securities[26], JP Morgan Chase

[23] Credit Agreement, dated December 14, 2007, with Bank of America (SEC Form 8-k filed December 20, 2007)
[24] Fifth Amendment, dated February 14, 2013, to the Credit Agreement with Bank of America (SEC Form 8-k filed February 21, 2013)
[25] Merrill Lynch, Pierce, Fenner & Smith Incorporated and Bank of America NA are both subsidiaries of Bank of America Corporation.
[26] JP Morgan Securities is the wealth management business conducted by JP Morgan & Chase and is an affiliate of JP Morgan Chase Bank.

Bank, PNC, U.S. Bank NA, and Wells Fargo Securities[27] [28] U.S. Bank serves as the exchange agent and trustee for $350 million of 5.875% Senior Notes due in 2023 for Savage.[29]

Smith & Wesson (American Outdoor Brands Corporation)

Smith & Wesson entered into a credit agreement in June 2015 for a $175 million line of credit and a $105 million term loan. A second amendment increased the revolving line to $350 million with an option to add $150 million.[30] The following institutions in our study, or their affiliates, financed these loans: TD Bank NA, BB&T, and Wells Fargo Securities.[31] [32]

Tobacco

In 2016, approximately 258 billion cigarettes were sold in the United States, and four companies accounted for approximately 92% of those sales: Reynolds American, Inc., Liggett (Vector Group Ltd.), ITG Brands, and Philip Morris USA (Altria Group, Inc.).[33] ITG Brands is not public and was thus excluded from our review. Exhibit 19 below shows the banks financing these three publicly traded tobacco producers.

[27] Wells Fargo Securities is the trade name for the capital markets and investment banking services of Wells Fargo & Company and is an affiliate of Wells Fargo Bank.
[28] Amended and Restated Credit Agreement, dated April 1, 2016 (SEC Form 8-K filed April 4, 2016)
[29] Prospectus (SEC Form 424 filed August 30, 2016)
[30] American Outdoor Brands Corporation (SEC Form 10-Q for quarterly period ended January 31, 2017)
[31] Wells Fargo Securities is the trade name for the capital markets and investment banking services of Wells Fargo & Company and is an affiliate of the Wells Fargo Bank.
[32] American Outdoor Brands Corporation Credit Agreement, dated June 15, 2015; Smith & Wesson Form 10-k 2016
[33] "Economic Trends in Tobacco." Centers for Disease Control and Prevention. March 3, 2017. <https://www.cdc.gov/tobacco/data_statistics/fact_sheets/economics/econ_facts/>

Exhibit 19: Bank Financing of Major Tobacco Producers, 2010-2017

	Reynolds American		Liggett		Philip Morris USA	
Bank Name	***Revolving Credit Line***	***Bonds***	***Revolving Credit Line***	***Bonds***	***Revolving Credit Line***	***Bonds***
Bank of America						
Bank of the West						
BB&T						
Capital One						
Citibank	✕	✕*			✕	✕*
HSBC						✕
JPMorgan Chase	✕	✕*			✕	✕*
PNC		✕*				
SunTrust						
TD Bank						
U.S. Bank				✕		✕*
Union Bank						
Wells Fargo		✕*	✕			✕*

Sources: U.S. Securities and Exchange Commission 10-K, 10-Q, 8-K, and 424 filings
*indicates affiliate entity

<u>Reynolds American, Inc.</u>

Reynolds American, Inc., entered into a credit agreement in 2014 with JPMorgan Chase and Citibank NA for a $2 billion revolving line of credit with the option to increase the line to $2.35 billion.[34] On September 12, 2013, $550 million of 4.85% Senior Notes due in 2023 and $550 million of 6.15% Senior Notes due in 2043 were issued by Citigroup[35], JP Morgan[36], Wells Fargo Securities[37], and PNC Capital Markets[38].[39] On June 29, 2015, $9 billion of Senior Notes at varying rates were

[34] Reynolds American, Inc. (SEC Form 8-K filed December 18, 2014)
[35] Citigroup Global Markets Inc is an investment banking and financial advisory form and is a subsidiary of Citigroup Financial Products and an affiliate of Citibank.
[36] JP Morgan is the investment banking subsidiary of JP Morgan & Chase and an affiliate of JP Morgan Chase Bank NA.
[37] Wells Fargo Securities is the trade name for the capital markets and investment banking services of Wells Fargo & Company and is an affiliate of the Wells Fargo Bank.
[38] PNC Capital Markets offers investment banking and advisory services and is a subsidiary of PNC Holding and an affiliate of PNC Bank.
[39] Reynolds American, Inc. Prospectus Supplement (SEC Form 424 filed September 12, 2013)

issued by Citigroup[40], JP Morgan[41], Wells Fargo Securities[42], and PNC Capital Markets[43], among others.[44]

Liggett (Vector Group Ltd.)

Wells Fargo provided a revolving credit agreement to Liggett, although the amount and date of the agreement could not be identified. U.S. Bank served as the exchange agent for the following:

- $90 million of 11% Senior Secured Notes due in 2015,[45]
- $75 million of 11% Senior Secured Notes due in 2015,[46]
- $85 million of 11% Senior Secured Notes due in 2015,[47]
- $450 million of 7.75% Senior Secured Notes due in 2021,[48] and
- $235 million of 7.75% Senior Secured Notes due in 2021.[49]

Philip Morris USA (Altria Group, Inc.)

In August 2013, Altria Group, Inc. entered into a revolving credit agreement with JPMorgan Chase Bank and Citibank for up to $3 billion.[50] On May 2, 2011, $1.5 billion of 4.75% Notes due in 2021 were issued with Citi[51], Wells Fargo Securities[52], HSBC, and JP Morgan[53].[54] On August 6, 2012, $1.9 billion of 2.85% Notes due in 2022 and $90 million of 4.25% Notes due in 2042 were issued with JP Morgan[55], Citigroup[56], HSBC, Wells Fargo Securities[57], and U.S. Bancorp[58] as co-managers.[59]

[40] Citigroup Global Markets Inc is an investment banking and financial advisory form and is a subsidiary of Citigroup Financial Products and an affiliate of Citibank.
[41] JP Morgan is the investment banking subsidiary of JP Morgan & Chase and an affiliate of JP Morgan Chase Bank NA.
[42] Wells Fargo Securities is the trade name for the capital markets and investment banking services of Wells Fargo & Company and is an affiliate of the Wells Fargo Bank.
[43] PNC Capital Markets offers investment banking and advisory services and is a subsidiary of PNC Holding and an affiliate of PNC Bank.
[44] Reynolds American, Inc. Prospectus Supplement (SEC Form 424 filed June 29, 2015)
[45] Vector Group Ltd. Prospectus (SEC Form 424 dated April 12 2011)
[46] Vector Group Ltd. Prospectus (SEC Form 424 dated May 6, 2010)
[47] Vector Group Ltd. Prospectus (SEC Form 424 dated May 6, 2010)
[48] Vector Group Ltd. Prospectus (SEC Form 424 dated April 26, 2013)
[49] Vector Group Ltd. Prospectus (SEC Form 424 dated June 29, 2016)
[50] Altria Group, Inc. Amended and Restated 5-Year Revolving Credit Agreement, dated as of August 19, 2013 (SEC Form 8-k filed August 23, 2013)
[51] Citi is a global bank and a subsidiary of Citigroup.
[52] Wells Fargo Securities is the trade name for the capital markets and investment banking services of Wells Fargo & Company and is an affiliate of the Wells Fargo Bank.
[53] JP Morgan is the investment banking subsidiary of JP Morgan & Chase and an affiliate of JP Morgan Chase Bank NA.
[54] Altria Group, Inc. Prospectus Supplement (SEC Form 424 dated May 2, 2011)
[55] JP Morgan is the investment banking subsidiary of JP Morgan & Chase and an affiliate of JP Morgan Chase Bank NA.
[56] Citigroup is the holding company of Citibank.

In April 2013, $350 million of 2.95% Notes due in 2023 and $650 million of 4.5% Notes due in 2043 were issued by HSBC, Wells Fargo Securities[60], Citigroup[61], JP Morgan[62], and U.S. Bancorp[63]. On October 28, 2013, $1.4 billion of 4% Notes due in 2024 and $1.8 billion of 5.375% Notes due in 2044 were issued by Citigroup[64], JP Morgan[65], U.S. Bancorp[66], HSBC, and Wells Fargo Securities[67].[68] Another $1 billion of 2.625% Notes due in 2020 were issued by Citigroup[69], JP Morgan[70], U.S. Bancorp[71], HSBC, and Wells Fargo Securities[72].[73] In 2016, $500 million of 2.625% Notes due in 2026 and $1.5 billion of 3.875% Notes due in 2046 were issued by Wells Fargo Securities[74], U.S. Bancorp[75], HSBC, Citigroup, and JP Morgan[76].[77]

---

57 Wells Fargo Securities is the trade name for the capital markets and investment banking services of Wells Fargo & Company and is an affiliate of the Wells Fargo Bank.
58 U.S. Bank is a subsidiary of U.S. Bancorp, a financial holding company.
59 Altria Group, Inc. Prospectus Supplement (SEC Form 424 dated August 6, 2012)
60 Wells Fargo Securities is the trade name for the capital markets and investment banking services of Wells Fargo & Company and is an affiliate of the Wells Fargo Bank.
61 Citigroup is the holding company of Citibank.
62 JP Morgan is the investment banking subsidiary of JP Morgan & Chase and an affiliate of JP Morgan Chase Bank NA.
63 Altria Group, Inc. Prospectus Supplement (SEC Form 424 dated April 29, 2013)
64 Citigroup is the holding company of Citibank.
65 JP Morgan is the investment banking subsidiary of JP Morgan & Chase and an affiliate of JP Morgan Chase Bank NA.
66 Altria Group, Inc. Prospectus Supplement (SEC Form 424 dated April 29, 2013)
67 Wells Fargo Securities is the trade name for the capital markets and investment banking services of Wells Fargo & Company and is an affiliate of the Wells Fargo Bank.
68 Altria Group, Inc. Prospectus Supplement (SEC Form 424 dated October 28, 2013)
69 Citigroup is the holding company of Citibank.
70 JP Morgan is the investment banking subsidiary of JP Morgan & Chase and an affiliate of JP Morgan Chase Bank NA.
71 Altria Group, Inc. Prospectus Supplement (SEC Form 424 dated April 29, 2013)
72 Wells Fargo Securities is the trade name for the capital markets and investment banking services of Wells Fargo & Company and is an affiliate of the Wells Fargo Bank.
73 Altria Group, Inc. Prospectus Supplement (SEC Form 424 dated November 10, 2014)
74 Wells Fargo Securities is the trade name for the capital markets and investment banking services of Wells Fargo & Company and is an affiliate of the Wells Fargo Bank.
75 Altria Group, Inc. Prospectus Supplement (SEC Form 424 dated April 29, 2013)
76 JP Morgan is the investment banking subsidiary of JP Morgan & Chase and an affiliate of JP Morgan Chase Bank NA.
77 Altria Group, Inc. Prospectus Supplement (SEC Form 424 dated September 13, 2016)

Nuclear Power

The Nuclear Energy Institute, a lobbying group based in Washington DC, published a list of US nuclear operators, owners, and holding companies. We selected the top 3 megawatt producers for review: Exelon Generation Company, Tennessee Valley Authority, and Duke Energy Carolinas.[78] Exhibit 20 below shows financing institutions for these three major nuclear energy producers.

Exhibit 20: Bank Financing of Top Nuclear Energy Producers, 2010-2017

	Exelon	**Tennessee Valley Authority**	**Duke Energy Carolinas**	
Bank Name	***Bonds***	***Revolving Credit Line***	***Revolving Credit Line***	***Bonds***
Bank of America		✕	✕	✕
Bank of the West	✕*	✕*		✕
BB&T		✕		
Capital One				
Citibank	✕*		✕	✕
HSBC				✕
JPMorgan Chase	✕*		✕	✕
PNC		✕		
SunTrust		✕		✕*
TD Bank				✕*
U.S. Bank	✕			✕*
Union Bank			✕	✕*
Wells Fargo	✕*	✕	✕	✕

Sources: U.S. Securities and Exchange Commission 10-K, 10-Q, 8-K, and 424 filings
*indicates affiliate entity

Exelon Generation Company

In March 2017, JP Morgan[79] served as a joint book running manager, which is the underwriter who has primary control and responsibility for an initial public offering, for the issuance of $250 million of 2.95% Senior Notes due in 2020 and $500 million of 3.4% Senior Notes due in 2022 for Exelon.[80] In January 2015,

[78] "US Nuclear Operators, Owners and Holding Companies." Nuclear Energy Institute. <https://www.nei.org/Knowledge-Center/Nuclear-Statistics/US-Nuclear-Power-Plants/US-Nuclear-Operators,-Owners-and-Holding-Companies>
[79] JP Morgan is the investment banking subsidiary of JP Morgan & Chase and an affiliate of JP Morgan Chase Bank NA.
[80] Exelon Generation Company. Prospectus Supplement (SEC Form 424 dated March 7, 2017)

Citigroup[81] and JP Morgan[82] served as the co-managers for $750 million of 2.95% Notes due in 2020.[83]

In January 2013, U.S. Bank served as the exchange agent for $523,303,000 of 4.25% Senior Notes due in 2022 and $788,203,000 of 5.6% Senior Notes due in 2042.[84] In September 2010, Citi[85], BNP Paribas[86], and Wells Fargo Securities[87] financed the issuance of $550 million of 4.0% Senior Notes due in 2020 and $350 million of 5.75% Senior Notes due in 2014.[88] In 2009, JP Morgan[89] financed the issuance of $600 million of 5.2% Senior Notes due in 2019 and $900 million of 6.25% Senior Notes due in 2039.[90] Citi[91], BNP Paribas[92], and JP Morgan[93] financed $700 million of 6.2% Senior Notes due in 2017.[94]

Tennessee Valley Authority

In December 2016, the Tennessee Valley Authority (TVA)[95] entered into a $150 million Credit Agreement with SunTrust Bank as Administrative Agent and BB&T as a Lender.[96] TVA also entered into a $1 billion Credit Agreement in June 2012, where Bank of America NA served as a financier.[97]

In December 2012, TVA entered into a $1 billion credit agreement with Wells Fargo Bank NA and PNC Bank NA, among others.[98] In September 2015, TVA

[81] Citigroup is the holding company of Citibank.
[82] JP Morgan is the investment banking subsidiary of JP Morgan & Chase and an affiliate of JP Morgan Chase Bank NA.
[83] Exelon Generation Company. Prospectus Supplement (SEC Form 424 dated January 8, 2015)
[84] Exelon Generation Company. Prospectus Supplement (SEC Form 424 dated January 8, 2013)
[85] Citi is a global bank and a subsidiary of Citigroup.
[86] Bank of the West is a subsidiary of BNP Paribas (USA), a financial holding company.
[87] Wells Fargo Securities is the trade name for the capital markets and investment banking services of Wells Fargo & Company and is an affiliate of the Wells Fargo Bank.
[88] Exelon Generation Company. Prospectus Supplement (SEC Form 424 dated September 27, 2010)
[89] JP Morgan is the investment banking subsidiary of JP Morgan & Chase and an affiliate of JP Morgan Chase Bank NA.
[90] Exelon Generation Company. Prospectus Supplement (SEC Form 424 dated September 16, 2009)
[91] Citi is a global bank and a subsidiary of Citigroup.
[92] Bank of the West is a subsidiary of BNP Paribas (USA), a financial holding company.
[93] JP Morgan is the investment banking subsidiary of JP Morgan & Chase and an affiliate of JP Morgan Chase Bank NA.
[94] Exelon Generation Company. Prospectus Supplement (SEC Form 424 dated September 25, 2007)
[95] The Tennessee Valley Authority is a quasi-public corporation—i.e., it is a corporation whose stock is publicly traded that was started or backed by the government. It is a federally owned corporation created by congressional charter but run independently of the government, receiving no taxpayer funding and deriving its revenues from sales of electricity.
[96] Maturity Community Bank Credit Agreement, dated December 12, 2016, set to expire December 2019, with SunTrust Bank, BB&T, amongst others (Incorporated by reference to Exhibit 10.1 to TVA's Current Report on Form 8-k filed on December 15, 2016, File No. 00052313).
[97] $1,000,000,000 Spring Maturity Credit Agreement Dated as of June 25, 2012, among TVA, Bank of America and others (Incorporated by reference to Exhibit 10.1 to TVA's Current Report on Form 8K filed on June 28, 2012, File No. 00052313)
[98] On December 13, 2012, TVA entered into a $1,000,000,000 Winter Maturity Credit Agreement, set to expire December 2017, with banks including PNC and Wells Fargo Bank, which allows TVA to access up to $1,000,000,000 in either loans or letters of credit.

entered into a $1 billion Credit Agreement with BNP Paribas[99], BB&T, SunTrust Bank, and Wells Fargo Bank NA, among others.[100] TVA entered into a $500 million Credit Agreement with Bank of America NA.[101]

Duke Energy Carolinas

In 2011, Duke Energy Carolinas entered into a $6 billion credit agreement, later amended and increased to $7.5 billion[102], with Bank of America NA, Citibank NA, Bank of Tokyo Mitsubishi[103], Wells Fargo Bank NA, and JPMorgan Chase Bank NA.[104] In May 2011, Bank of America Merrill Lynch[105] and Wells Fargo Securities[106] financed $500 million of 3.9% Notes due in 2021.[107] In December 2011, JPMorgan[108], Citigroup[109], SunTrust Robinson Humphrey[110], Mitsubishi UFJ Securities[111], and U.S. Bancorp[112] financed $350 million of 1.75% mortgage bonds due in 2016 and $650 million in 4.0% mortgage bonds due in 2042.[113] In September 2012, U.S. Bancorp[114] co-managed the issuance of $650 million in bonds.[115] In March 2015, Bank of America Merrill Lynch[116], Citigroup[117], U.S.

---

[99] Bank of the West is a subsidiary of BNP Paribas (USA), a financial holding company.

[100] On September 30, 2015, TVA entered into a $1,000,000,000 September 2020 Maturity Credit Agreement with BNP Paribas, BB&T, SunTrust Bank, and Wells Fargo Bank, amongst others. (SEC form 8-k dated June 5, 2015)

[101] $500,000,000 February 2020 Maturity Credit Agreement Dated as of August 7, 2015, among TVA, Bank of America, N.A., as Administrative Agent, Letter of Credit Issuer, and a Lender, and the Other Lenders Party Thereto (Incorporated by reference to Exhibit 10.1 to TVA's Current Report on Form 8K filed on August 7, 2015, File No. 00052313).

[102] On January 30, 2015, Duke Energy entered into an amendment to the $6,000,000,000 Credit Agreement, dated as of November 18, 2011 and as amended on December 18, 2013, with Wells Fargo Bank and others. The amendment was entered into primarily to increase the maximum aggregate borrowing amount available to the Borrowers to $7,500,000,000, and to extend the termination date of the facility from December 2018 to January 30, 2020. (incorporated by reference to Exhibit 10.1 of registrant's Current Report on Form 8K Filed on February 5, 2015, File Nos. 132853, 14928, 11232, 13543, 13382 and 13274).

[103] Bank of Tokyo Mitsubishi and Union Bank are both subsidiaries of Mitsubishi UFJ Financial Group, Inc., a financial holding company.

[104] On December 18, 2013, Duke Energy Corporation entered into an amendment to the $6,000,000,000 Credit Agreement, dated as of November 18, 2011, with Wells Fargo Bank, Bank of America, Citibank, JPMorgan Chase Bank, and the Bank of Tokyo Mitsubishi UFJ, Ltd. (incorporated by reference to Exhibit 10.1 to registrant's Current Report on Form 8K filed on November 25, 2011, File Nos. 132853, 14928, 11232 and 13543).

[105] Merrill Lynch is a subsidiary of Bank of America.

[106] Wells Fargo Securities is the trade name for the capital markets and investment banking services of Wells Fargo & Company and is an affiliate of the Wells Fargo Bank.

[107] Duke Energy Carolinas. Prospectus Supplement (SEC Form 424 dated May 16, 2011)

[108] JP Morgan is the investment banking subsidiary of JP Morgan & Chase and an affiliate of JP Morgan Chase Bank NA.

[109] Citigroup is the holding company of Citibank.

[110] SunTrust Robinson Humphrey provides investment banking services under SunTrust Banks, Inc.

[111] Mitsubishi UFJ Securities and Union Bank are both subsidiaries of Mitsubishi UFJ Financial Group, Inc., a financial holding company.

[112] U.S. Bank is a subsidiary of U.S. Bancorp, a financial holding company.

[113] Duke Energy Carolinas. Prospectus Supplement (SEC Form 424 dated December 5, 2011)

[114] U.S. Bank is a subsidiary of U.S. Bancorp, a financial holding company.

[115] Duke Energy Carolinas. Prospectus Supplement (SEC Form 424 dated September 18, 2012)

[116] Merrill Lynch is a subsidiary of Bank of America.

Bancorp[118], and HSBC financed the issuance of $500 million of 3.75% mortgage bonds due in 2045.[119] In March 2016, BNP Paribas[120], TD Securities[121], Citigroup[122], and HSBC financed the issuance of $500 million of 2.5% mortgage bonds due in 2023 and $500 million of 3.875% mortgage bonds due in 2046.[123] In November 2016, BNP Paribas[124] financed the issuance of $600 million in 2.95% mortgage bonds due in 2026.[125]

[117] Citigroup is the holding company of Citibank.
[118] U.S. Bank is a subsidiary of U.S. Bancorp, a financial holding company.
[119] Duke Energy Carolinas. Prospectus Supplement (SEC Form 424 dated March 9, 2015)
[120] Bank of the West is a subsidiary of BNP Paribas (USA), a financial holding company.
[121] TD Securities is part of the wholesale banking business of TD Bank Group.
[122] Citigroup is the holding company of Citibank.
[123] Duke Energy Carolinas. Prospectus Supplement (SEC Form 424 dated March 8, 2016)
[124] Bank of the West is a subsidiary of BNP Paribas (USA), a financial holding company.
[125] Duke Energy Carolinas. Prospectus Supplement (SEC Form 424 dated November 14, 2016)

Dakota Access Pipeline

Food and Water Watch, a consumer rights group, published a comprehensive list of financiers of the Dakota Access Pipeline in September 2016. Dakota Access LLC, is owned by a consortium of companies, including: Energy Transfer Partners, Sunoco Logistic Partners, Phillips 66, Enbridge and Marathon Petroleum. Exhibit 21 below summarizes the financial institutions backing the pipeline through financing oil and gas infrastructure and through providing project level loans in the following ways:

- $2.5 billion revolving credit line to Sunoco Logistics
- $3.75 billion revolving credit line to Energy Transfer Partners
- $1.5 billion revolving credit line to Energy Transfer Partners
- $2.5 billion in project level loans to construct the Dakota Access Pipeline

Exhibit 21: Bank Financing of Dakota Access Pipeline

Bank Name	***Revolving Credit Lines***	***Project Level Loans***
Bank of America	✕	✕
Bank of the West	✕*	✕*
BB&T		
Capital One		
Citibank	✕	✕
HSBC	✕	
JPMorgan Chase	✕	
PNC	✕	✕
SunTrust	✕	✕
TD Bank	✕*	✕*
U.S. Bank	✕	✕
Union Bank	✕*	✕*
Wells Fargo	✕	✕

Source: Food & Water Watch. "Who's Banking on the Dakota Access Pipeline?" September 2016. <https://www.foodandwaterwatch.org/news/who%27s-banking-dakota-access-pipeline> Accessed April 28, 2017.
*indicates affiliate entity

Private Prisons

The two largest private prison companies, Corrections Corporation of America (now CoreCivic) and GEO Group, were examined by *In the Public Interest* in November 2016. A summary of the extent to which they receive financing from the thirteen banks analyzed for this report and their affiliates is presented in Exhibit 22.

Exhibit 22: Bank Financing of Largest Private Prisons, 2007-2015

	Corrections Corporation of America			GEO Group		
Bank Name	***Revolving Credit Line***	***Term Loan***	***Bonds***	***Revolving Credit Line***	***Term Loan***	***Bonds***
Bank of America	✕	✕	✕*	✕	✕	✕*
Bank of the West				✕*	✕*	✕*
BB&T						
Capital One						
Citibank						
HSBC			✕			✕
JPMorgan Chase	✕	✕	✕*	✕		✕*
PNC	✕	✕	✕*			
SunTrust	✕	✕	✕*	✕	✕	✕*
TD Bank						✕*
U.S. Bank	✕*		✕*			
Union Bank						
Wells Fargo	✕	✕	✕*	✕	✕	✕*

Sources: U.S. Securities and Exchange Commission 10-K, 10-Q, 8-K, and 424 filings
*indicates affiliate entity

Corrections Corporation of America (now CoreCivic)

SunTrust, Bank of America NA, Wells Fargo Bank NA, JPMorgan Chase, PNC, and U.S. Bancorp[126] participated in the financing of a revolving line of credit of $900 million to the Corrections Corporation of America (CCA).[127] Bank of America NA, JPMorgan Chase Bank NA, SunTrust Bank, Wells Fargo Bank, and PNC participated in the financing of a $100 million term loan to CCA.[128] Wells Fargo Securities[129],

[126] U.S. Bank is a subsidiary of U.S. Bancorp, a financial holding company.
[127] CCA Second Amendment to Amended and Restated Credit Agreement, dated July 22, 2105
[128] CCA's Third Amendment and Incremental Term Loan Agreement, dated October 6, 2015
[129] Wells Fargo Securities is the trade name for the capital markets and investment banking services of Wells Fargo & Company and is an affiliate of the Wells Fargo Bank.

Bank of America Merrill Lynch[130], JP Morgan[131], SunTrust Robinson Humphrey[132], PNC Capital Markets[133], and U.S. Bancorp[134] participated in the underwriting of $250 million of CCA's 5.0% bonds due in 2022.[135] These banks, along with HSBC, also financed CCA's $325 million of 4.125% bonds due 2020 and $350 million of 4.625% bonds due 2023.[136]

GEO Group

Bank of America, BNP Paribas[137], JPMorgan Chase Bank, SunTrust Bank, and Wells Fargo Bank provided GEO Group $450 million in a revolving credit line, which was increased to $900 million in May 2016.[138] BNP Paribas[139], Bank of America, SunTrust Bank, and Wells Fargo Bank extended a loan of $300 million in 2013 to GEO Group.[140]

Bank of America Merrill Lynch[141], Wells Fargo Securities[142], SunTrust Robinson Humphrey[143], JP Morgan[144], BNP Paribas[145], and HSBC financed GEO Group's $350 million of 6.0% bonds due in 2026.[146] These banks, along with TD Securities[147], financed GEO Group's $250 million of 5.875% bonds due in 2024.[148] Wells Fargo Securities[149] and Bank of America Merrill Lynch[150] participated in the issuance of

---

[130] Merrill Lynch is a subsidiary of Bank of America.
[131] JP Morgan is the investment banking subsidiary of JP Morgan & Chase and an affiliate of JP Morgan Chase Bank NA.
[132] SunTrust Robinson Humphrey provides investment banking services under SunTrust Banks, Inc.
[133] PNC Capital Markets offers investment banking and advisory services and is a subsidiary of PNC Holding and an affiliate of PNC Bank.
[134] U.S. Bank is a subsidiary of U.S. Bancorp, a financial holding company.
[135] CCA's First Supplemental Indenture dated September 25, 2015 (SEC Form 424 dated September 21, 2015)
[136] CCA's Registration Rights agreement dated April 4, 2013
[137] Bank of the West is a subsidiary of BNP Paribas (USA), a financial holding company.
[138] GEO Group's Second Amendment No. 1 to Second Amended and Restated Credit Agreement, dated May 19, 2016
[139] Bank of the West is a subsidiary of BNP Paribas (USA), a financial holding company.
[140] GEO Group (SEC Form 10-Q for quarter ended June 30, 2016)
[141] Merrill Lynch is a subsidiary of Bank of America.
[142] Wells Fargo Securities is the trade name for the capital markets and investment banking services of Wells Fargo & Company and is an affiliate of the Wells Fargo Bank.
[143] SunTrust Robinson Humphrey provides investment banking services under SunTrust Banks, Inc.
[144] JP Morgan is the investment banking subsidiary of JP Morgan & Chase and an affiliate of JP Morgan Chase Bank NA.
[145] Bank of the West is a subsidiary of BNP Paribas (USA), a financial holding company.
[146] GEO Group (SEC Form 8-k filed April 18, 2016)
[147] TD Securities is part of the wholesale banking business of TD Bank Group.
[148] GEO Group (SEC Form 8-k filed September 25, 2014)
[149] Wells Fargo Securities is the trade name for the capital markets and investment banking services of Wells Fargo & Company and is an affiliate of the Wells Fargo Bank.
[150] Merrill Lynch is a subsidiary of Bank of America.

$250 million of 5.875% bonds due in 2022[151] and $300 million of 5.125% due in 2023.[152]

[151] GEO Group (SEC Form 8-k filed October 3, 2013)
[152] GEO Group (SEC Form 8-k filed March 19, 2013)

Conclusion

None of the banks analyzed exceeded the benchmark values for all social responsibility indicators related to board of directors' gender and racial/ethnic diversity, small business loans, community development loans, home loans to borrowers of color and low-income borrowers, and overdraft policies for bank customers with checking accounts. Similarly, none of the banks fell below the benchmark values for all indicators. U.S. Bank exceeded the benchmark values for the most indicators (5 out of 8), and JPMorgan Chase fell below the benchmark values for the most indicators (6 out of 8).

All banks in our study finance major public companies in at least one of the industries or business entities examined, including: civilian firearms, tobacco, nuclear power, the Dakota Access Pipeline, and private prisons.

Exhibit 23: Bank practices and financing summary

	Bank Practices			Total number of industries/ entities financed
Bank name	**Total missing**	**Total above or equal to benchmark**	**Total below benchmark**	
Bank of America	0	4	4	4
Bank of the West	2	3	3	4
BB&T	0	4	4	2
Capital One	2	2	4	1
Citibank	0	5	3	3
HSBC	2	2	4	4
JPMorgan Chase	0	2	6	5
PNC	2	2	4	5
SunTrust	2	1	5	3
TD Bank	1	4	3	4
U.S. Bank	0	5	3	5
Union Bank	0	4	4	2
Wells Fargo	0	4	4	5

Appendix

Small Business Loans in San Francisco

In 2015, the banks analyzed made 13,006 small business loans for a total of $482.9 million in loans in the City and County of San Francisco according to Community Reinvestment Act (CRA) reports for 2015. Wells Fargo made the most small business loans (5,577) and the largest total amount of small business loans ($269.9 million) in the City, as shown in Exhibit 24 below.

Exhibit 24: Small business loans in San Francisco, 2015

Bank name	Number	Amount (000s)
Average	1,000	$37,149
Bank of America	3,913	100,678
Bank of the West	112	13,984
BB&T	2	8
Capital One	7	86
Citibank	1,759	16,764
HSBC	40	1,361
JPMorgan Chase	127	26,179
PNC	5	1,430
SunTrust	1	470
TD Bank	2	240
U.S. Bank	1,295	25,243
Union Bank	166	26,553
Wells Fargo	5,577	269,939
Total	**13,006**	**$482,935**

Source: FFIEC, CRA 2015 Disclosure Reports

Top 25 Affordable Housing Lenders

Eight of the thirteen banks analyzed in this report (or their affiliates) were among the top 25 affordable housing lenders in 2015 as reported by Affordable Housing Finance (AHF).[153] In 2015, Citi Community Capital[154], an affiliate of Citibank, was the top affordable housing lender and lent a total of $4.8 billion for affordable housing. Affordable housing loans for the top 25 affordable housing lenders are shown below. Note loan totals for bank affiliates may not be directly compared to the community development loan totals presented earlier in this report.

[153] AHF affordable housing loan totals are based on surveys of affordable housing lenders.
[154] Citi Community Capital is the community lending and investment arm of Citigroup, which owns Citicorp. Holding Co.

Appendix

Exhibit 25: Top 25 affordable housing lenders

Rank	Name	2015 (in millions)**	2014 (in millions)**
1	Citi Community Capital*[155]	$4,829.2	$3,222.4
2	Wells Fargo*	3,020.8	2,788.4
3	Bank of America Merrill Lynch*[156]	2,573.0	1,750.0
4	JPMorgan Chase Bank*	1,406.0	1,287.0
5	JLL Capital Markets	1,052.0	748.5
6	Capital One*	864.0	1,315.0
7	Berkadia	760.0	N/A
8	PNC Real Estate*[157]	740.1	908.9
9	U.S. Bank*	725.0	690.0
10	Pillar	604.4	349.4
11	Greystone Servicing Corp.	582.4	505.0
12	Prudential Mortgage Capital Co.	565.6	518.8
13	Walker & Dunlop	557.0	588.1
14	KeyBank Real Estate Capital	555.0	364.0
15	Red Capital Group	553.8	375.1
16	Red Stone Tax Exempt Funding	538.0	475.0
17	Stifel, Nicolaus & Co.	525.0	415.0
18	Rockport Mortgage Co.	514.4	340.1
19	RBC Capital Markets	490.0	416.3
20	SunTrust Community Capital*[158]	450.0	437.0
21	CBRE Capital Markets	338.8	146.5
22	Gershman Mortgage	224.0	219.0
23	Local Initiatives Support Corp.	218.9	208.4
24	Century Housing Corp.	196.4	118.9
25	Love Funding	119.1	139.2

Source: Affordable Housing Finance Magazine
*Bank analyzed in this report or an affiliate thereof
**Totals include construction loans for affordable housing and permanent loans for 9% Low-Income Housing Tax Credit projects, Section 8 housing, and bond credit enhancement

[155] Citi Community Capital is the community lending and investment arm of Citigroup, which owns Citicorp. Holding Co.
[156] Total includes loans made by Bank of America and affiliate Merrill Lynch. Bank of America and Merrill Lynch are both subsidiaries of the financial holding company, Bank of America Corp.
[157] PNC Bank and certain affiliates do business as PNC Real Estate
[158] SunTrust Community Capital is a wholly owned subsidiary of SunTrust Bank.

Appendix

Pew Charitable Trusts Best and Good Overdraft Practices

Exhibit 26: Pew Charitable Trust Overdraft Practices, 2015

	Best practices			Good practices					
Bank name	No ATM overdrafts	No debit point-of-sale overdrafts	No high-to-low transaction reordering	Limited high-to-low transaction reordering	Threshold amount to trigger an overdraft	No extended overdraft fee	Limited number of overdraft fees per day	**Total best practices**	**Total good practices**
All 45 banks reviewed	16%	16%	53%	84%	69%	42%	91%	0.85 (avg)	2.86 (avg)
Bank of America		✓		✓			✓	1	2
Bank of the West			✓	✓	✓		✓	1	3
BB&T			✓	✓	✓	✓	✓	1	4
Capital One				✓	✓	✓	✓	0	4
Citibank	✓	✓	✓	✓		✓	✓	3	3
HSBC	✓	✓	✓	✓	✓	✓	✓	3	4
JPMorgan Chase	✓			✓	✓		✓	1	3
PNC				✓	✓		✓	0	3
SunTrust					✓		✓	0	2
TD Bank					✓		✓	0	2
U.S. Bank			✓	✓	✓		✓	1	3
Union Bank				✓	✓		✓	0	3
Wells Fargo			✓	✓	✓	✓	✓	1	4

Source: The Pew Charitable Trusts. "Checks and Balances: 2015 update." May 2015.