

MEMORANDUM

Summaries of Comptroller Calls with Bank CEOs

Date: 1-22-20

Participants: Comptroller and Andy Cecere, CEO of US Bank

Summary: Comptroller provided a summary of the NPR and the four key areas of reform and the mischaracterizations that exists about the proposal. They also discussed transition periods and treatment mortgage origination in the proposal.

Date: 1-23-20

Participants: Comptroller and Greg Braca, CEO of TD Bank

Summary: Comptroller provided a summary of the NPR and the four key areas of reform and the mischaracterizations that exists about the proposal. They also discussed treatment mortgage origination, standby letter of credits, and the record keeping/reporting requirements in the proposal.

Date: 1-23-20

Participants: Comptroller and Bruce Van Saun, CEO of Citizens Bank

Summary: Comptroller provided a summary of the NPR and the four key areas of reform and the mischaracterizations that exists about the proposal. They also discussed treatment the balance sheet value approach and record keeping/reporting requirements in the proposal.

Date: 1-23-20

Participants: Comptroller and Greg Carmichael, CEO of 5/3 Bank

Summary: Comptroller provided a summary of the NPR and the four key areas of reform and the mischaracterizations that exists about the proposal. They also discussed assessment areas, clarity of what qualifies, and the record keeping/reporting requirements in the proposal.

Date: 1-24-20

Participants: Comptroller and Tim Wennes, CEO of Santanter Bank

Summary: Comptroller provided a summary of the NPR and the four key areas of reform and the mischaracterizations that exists about the proposal. They also discussed the record keeping/reporting requirements in the proposal.

Date: 1-24-20

Participants: Comptroller and Charlie Scharf, CEO of Wells Fargo

Summary: Comptroller provided a summary of the NPR and the four key areas of reform and the mischaracterizations that exists about the proposal. They also discussed treatment mortgage origination in the proposal.

Date: 1-24-20

Participants: Comptroller and Steve Cummings, CEO of MUFG

Summary: Comptroller provided a summary of the NPR and the four key areas of reform and the mischaracterizations that exists about the proposal. They also discussed the record keeping/reporting requirements in the proposal.

Date: 1-24-20

Participants: Comptroller and Chris Carey, CEO of City National Bank

Summary: Comptroller provided a summary of the NPR and the four key areas of reform and the mischaracterizations that exists about the proposal.

Date: 1-24-20

Participants: Comptroller and Beth Mooney, CEO of Key Bank

Summary: Comptroller provided a summary of the NPR and the four key areas of reform and the mischaracterizations that exists about the proposal. They also discussed the importance of examiner judgement and timely feedback on exams.

Date: 1-24-20

Participants: Comptroller and Richard Fairbank, CEO of Capital One

Summary: Comptroller provided a summary of the NPR and the four key areas of reform and the mischaracterizations that exists about the proposal. They also discussed treatment mortgage origination in the proposal and impact of proposal on major market areas.

Date: 1-24-20

Participants: Comptroller and Steve Steinour, CEO of Huntington Bank

Summary: Comptroller provided a summary of the NPR and the four key areas of reform and the mischaracterizations that exists about the proposal. They also discussed the general need for reform and the balance sheet value approach in the proposal.

Date: 1-24-20

Participants: Comptroller and David Casper, CEO of BMO

Summary: Comptroller provided a summary of the NPR and the four key areas of reform and the mischaracterizations that exists about the proposal. They also discussed the general need for reform and clarity of CRA.

Date: 1-27-20

Participants: Comptroller and Brian Moynihan, CEO of Bank of America

Summary: Comptroller provided a summary of the NPR and the four key areas of reform and the mischaracterizations that exists about the proposal. They also discussed implementation costs and the treatment of different types of deposits under the proposal.

Date: 1-27-20

Participants: Comptroller and Bill Demchak, CEO of PNC

Summary: Comptroller provided a summary of the NPR and the four key areas of reform and the mischaracterizations that exists about the proposal. They also discussed the treatment of tax credits, housing credits, and syndications under the proposal.

Date: 1-27-20

Participants: Comptroller and James Gorman, CEO of Morgan Stanely

Summary: Comptroller provided a summary of the NPR and the four key areas of reform and the mischaracterizations that exists about the proposal. They also discussed the need of retaining strategic plans in the proposal.

Date: 1-30-20

Participants: Comptroller and Mike Corbat, CEO of Citi

Summary: Comptroller provided a summary of the NPR and the four key areas of reform and the mischaracterizations that exists about the proposal. They also discussed credit for activities outside of an assessment area.

Date: 1-31-20

Participants: Comptroller and Jamie Dimon, CEO of JPMC

Summary: Comptroller provided a summary of the NPR and the four key areas of reform and the mischaracterizations that exists about the proposal. They also discussed the objectivity of CRA reform.