



2024 Public Comment Letters

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[REDACTED]

From:

Sent:

Saturday, February 17, 2024 11:13 PM

To:

Cc:

Subject:

[REDACTED]

02/17/2024

[REDACTED]

RE: Adverse Action Letter

Dear Sir/Madam,

I am writing to formally dispute the recent denial of credit for my business, [REDACTED] by your esteemed institution. I am deeply concerned about the basis upon which this decision was made, as it appears to be discriminatory and lacking in valid or legal cause. As a small black-owned business, I am aware of the protections afforded to me under various laws and regulations that aim to prevent discrimination and ensure fair treatment in financial matters.

The reason you stated for my denial in three of the letters I received was deemed because of "lack of relationship with bank/inadequate credit history and transaction history" which is seemingly odd because I spoke with your bank reps in regard to funding opportunities with your bank and they informed me of their "no-doc" loans and encouraged us to apply, even with knowing that we did not have a substantial history with your financial institution. I would also like to add that it was discovered that our application for the loan had the wrong address on it-- as it stated [REDACTED] as you disclosed to me over the phone [REDACTED]. So there is no way that [REDACTED] could have properly submitted our application the first time or the second time she escalated it if the address was wrong.

Additionally, we met the General Accountants Acceptance Principal by opening our account for the business with at least [REDACTED] so for your denial letter to also state that we "lacked experience with the present account" is very ambiguous in its nature and does not constitute a valid legal reason to deny credit. And if this has anything to do with credit history and payment history, the inquiry you placed on our credit profile will ensure you that there is a 100% payment history for 4 years and beyond over 10+ accounts of active revolving credit.

First and foremost, I would like to draw your attention to the numerous laws and regulations that prohibit discrimination against small black-owned businesses. These include but are not limited to:

1. The Equal Credit Opportunity Act (ECOA) - This federal law prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age, or because an applicant receives income from a public assistance program. More specifically, U.S.C. 15 Section 1691 and U.S.C. 15 Section 1692 for any adverse actions required as remedy for this particular situation.

2. The Fair Housing Act (FHA) - While primarily aimed at preventing discrimination in housing, the FHA also has provisions that prohibit discrimination in lending, ensuring equal access to credit for all individuals, regardless of race or other protected characteristics.

3. The Community Reinvestment Act (CRA) - This law encourages financial institutions to meet the credit needs of the communities in which they operate, including low- and moderate-income neighborhoods and minority communities.

4. State and local laws - Many states and local jurisdictions have additional laws and regulations that further protect against discrimination in lending practices, including those aimed specifically at supporting minority-owned businesses.

In addition to the laws mentioned above, there are also legal principles and guidelines that prohibit banks from denying credit to consumers without valid or legal cause. These include:

1. Prudent lending practices - Banks are expected to assess creditworthiness based on objective criteria such as credit history, income, and business viability, rather than subjective factors such as race or ethnicity.

2. Duty of fair dealing - Financial institutions have a legal obligation to deal fairly and honestly with their customers, which includes providing access to credit on a nondiscriminatory basis.

3. Regulatory oversight - Banks are subject to oversight by regulatory agencies such as the Federal Reserve, the Office of the Comptroller of the Currency, and the Consumer Financial Protection Bureau, which enforce laws and regulations designed to promote fair lending practices.

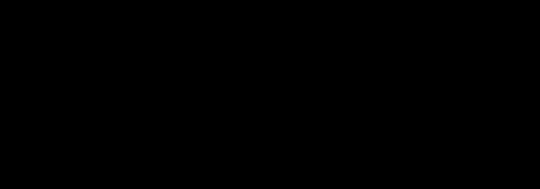
Given the legal and regulatory framework outlined above, I am requesting that you reconsider your decision to deny credit to my business. I believe that the denial was unjust and discriminatory, and I expect your institution to adhere to the highest standards of fairness and equality in its lending practices.


Keep in mind that your internal errors have also caused the money that was deposited in our business checking and business savings account to be inaccessible to us and that is totally unacceptable and unfair to our business, its practices and its members/managers. This has been an on-going issue for weeks and we need immediate action to be taken to remedy this situation.

Furthermore, I am prepared to take any necessary legal action to protect my rights and seek redress for any harm caused by this discriminatory treatment. I trust that you will act swiftly to address this matter and ensure that my business is treated fairly and equitably in accordance with the law.

Thank you for your attention to this important issue. I look forward to your prompt response.

Sincerely,



On Fri, Feb 16, 2024 at 1:26 PM  wrote:

Good afternoon, [REDACTED]

So the feedback I received in reference to the Credit Application was that is declined. [REDACTED] can revisit lending opportunity after 3-6 months of Depository activity. The underwriters have been declining applications due to what is considered "no banking relationship". So it was not declined based on credit (start up business*), but due to no relationship activity to support start up business financial position. [REDACTED] did actually escalate and it was declined the second time. Again recommendation is to have supporting activity through your KeyBank account. I have had clients who were able to be approved after 3-6 months, so there could be a positive outcome in the coming months.

In reference to the Debit Card. I could not order the card for [REDACTED] due to the account is still restricted. From what I understand, the lease that you provided to [REDACTED] was deemed unacceptable. We are going to attempt an internal process to get account unrestricted.

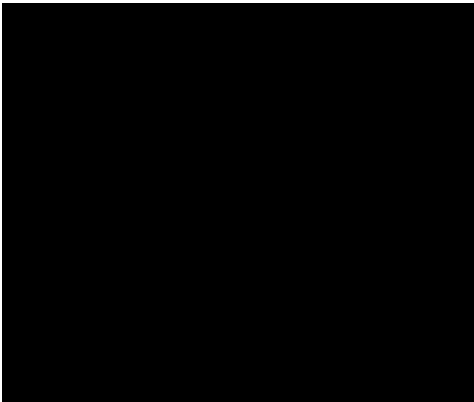
Regards,

KeyBank 
Opens Doors.™

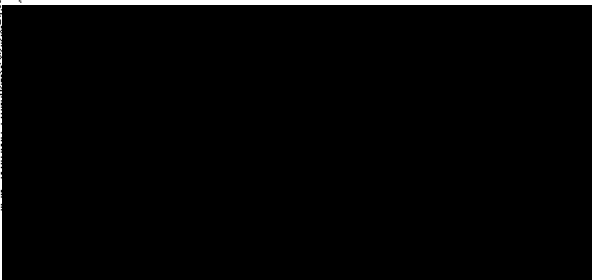
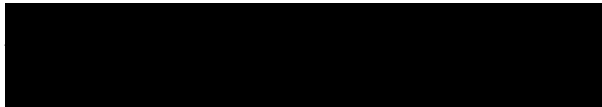
Head  Hero

[Key.com](#) | [Facebook](#) | [Twitter](#) | [LinkedIn](#)

WARNING: This email originated externally. Exercise caution. Think before clicking links or opening attachments.



On Wed, Feb 14, 2024 at 2:48 PM Grant,



KeyBank 
Opens Doors.™

Head  Hero

[Key.com](#) | [Facebook](#) | [Twitter](#) | [LinkedIn](#)

KeyCorp Public

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127 Public Square, Cleveland, OH 44114

If you prefer not to receive future e-mail offers for products or services from Key, send an email to <mailto:DNERequests@key.com> with 'No Promotional E-mails' in the SUBJECT line.



KeyBank
Enterprise Client Relations

127 Public Square
Cleveland, OH 44114

October 26, 2024

[REDACTED]

RE: [REDACTED]

KeyBank Case No. 2KKVV8

Dear [REDACTED]

This letter is in response to concerns regarding your experience working with a KeyBank branch, an alleged inability to access funds in your newly opened Accounts, claims of an incorrect address associated with your Accounts, as well as the declination of your business credit applications, which you feel was discriminatory. We regret the frustrating experience you've had and would like to share the results of our investigation.

Upon review, our records indicate you visited the [REDACTED] to open a Basic Business Checking Account and a Business Saver Account on January 18, 2024. While the checking Account was opened using your home address, the savings Account was opened using the business address. During Account opening you advised the branch that business would be conducted from both addresses. Furthermore, as requested, you and your son were listed as signers on the checking Account, while the savings Account listed only yourself as signer.

A restriction was subsequently placed on both Accounts on January 22, 2024, as additional verification was required for the business address. The branch was notified of the restriction, were asked to contact you to inform you of the restriction, and request the additional documentation needed in order for the Accounts to remain open. The branch notified you on January 29, 2024, and a lease agreement was provided to the branch on January 31, 2024, which was sent for review. The lease agreement was found unacceptable as it was missing the landlord's signature. A complete, signed lease agreement was then requested; however, was never received.

Further review found [REDACTED] visited the branch on January 29, 2024, during which time you requested the removal of your son as signer from the checking Account and had him added as a signer to the savings Account. The branch completed the Account maintenance per your request that day.

With regards to address maintenance, records indicate your son visited [REDACTED] on February 14, 2024 to request an update to the savings Account mailing address. The maintenance was completed that day, with the enclosed letter sent confirming the update.

Additional review determined credit applications were submitted for a Business Line of Credit, Business Credit Card, and a Business Cash Reserve Credit Account in your name only on January 31, 2024. The

address on the applications was your home address, which at the time was valid due to our inability to verify the business address. Our review found the use of this address would not preclude the submission of the applications.

With regards to KeyBank's credit decision, the enclosed letters were mailed to the address on file on February 11, 2024, advising of the credit denials. The branch attempted to have the applications re-reviewed, which were also denied. Our review found no indication the denial of credit was done in any type of discriminatory manner to substantiate your allegation.

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

Finally, both business Accounts were closed, per your request, on February 21, 2024. The remaining funds were withdrawn and provided to you in cash that day.

We can assure you any opportunities found during our review were addressed internally with the appropriate personnel; however, had no bearing on our credit decision. We truly regret any frustration this matter has caused you.

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TTY/TRS device, Dial 711. We are available Monday through Friday from 8am to 6pm Eastern time.

Sincerely,



Enterprise Client Relations
Office of the President

Enclosures:

- Savings Account Address Change Confirmation Notice dated February 14, 2024
- Responsive Line of Credit Denial Letter dated February 11, 2024
- Business Cash Rewards Credit Card Denial Letter dated February 11, 2024
- Business Cash Reserve Denial Letter dated February 11, 2024

[REDACTED]

April 18, 2024

[REDACTED]

[REDACTED]

Dear [REDACTED] Chairman and Chief Executive Officer of KeyCorp,

My name is [REDACTED] I am a Black chiropractic physician who is writing to inform you of a serious situation concerning my commercial banking relationship with KeyBank.

On December 2, 2022 I financed the purchase of a Second Chiropractic Office located at [REDACTED] and the real estate of the Chiropractic Office's condo suite. These purchases were financed through KeyBank for a combined total of [REDACTED]. From the beginning of the purchasing process I made it clear I wanted my finance package to include a business line of credit, a business credit card, and upon earning my business I would consider doing more business with KeyBank.

Needless to say, I never received nor was I offered a business line of credit or business credit card regarding the purchase of this Second Chiropractic Office. As time went on, I reminded Mr. [REDACTED] about this. When I did, I was surprised to find out a quid pro quo now existed. Nine months after Closing on the Second Chiropractic Office I notified [REDACTED] I was looking to purchase another office building 0.3 miles away from my First Chiropractic Office. But when asked if KeyBank was in a lending posture to finance this new deal, [REDACTED] first response was "We would have an interest for sure but you would have to bring all of your operating accounts over to Key."

- Requests would be made of [REDACTED] would comply, but when [REDACTED] [REDACTED] would make a requests like a business line of credit and/or business credit card which could help bridge resource gaps, create job(s), add to community development, create positive role models, inspire future black generation(s), and help grow [REDACTED] [REDACTED] businesses in an equitable and inclusive way; the goalposts would appear to be moved yet again.

On February 28, 2024, [REDACTED] received three "Final Demand For Payment" Notices regarding Loan (1). (See Exhibits B1, B2, and B3.) When [REDACTED] was notified of this, [REDACTED] initial response was, "We know that. The payments have been made." (See Correspondences 19 and 20.)

On February 28, 2024 [REDACTED] that although both Loans (1) and (2) are automatically withdrawn, [REDACTED] at Keybank's [REDACTED] in [REDACTED] said both loans were 26 days delinquent for 0.50 cents and 0.51 cents respectively. (See Correspondence 21.)

On March 8, 2024 [REDACTED] the payments for Loans (1) and (2) had been corrected. (See Correspondences 22.)

On March 22, 2024 [REDACTED] there was still a problem. [REDACTED] April statement showed Loan (2) still had a February interest balance of 51 cents and the monthly payment which is supposed to be [REDACTED] resulting in another Technical Default at the hands of KeyBank; again their fault, and not [REDACTED] (See Correspondences 23.)

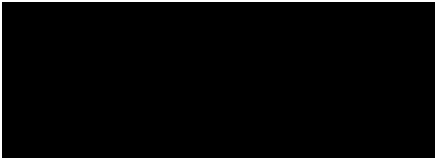
Credit Report:

On March 13, 2024 [REDACTED] notified [REDACTED] that he needed more items yet again. This time [REDACTED] requested the 2023 tax return for [REDACTED] First Chiropractic Office and access to [REDACTED] Equifax credit report. (See Correspondence 24.)



KeyBank
Enterprise Client Relations
127 Public Square
Cleveland, OH 44114

October 2, 2024



RE: Commercial Mortgage Accounts Ending in [REDACTED]
KeyBank Case No. 2LDTA6

Dear [REDACTED]

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

Our records confirmed that in 2022, our Business Banking Relationship Manager met at your [REDACTED] location to discuss the purchase of additional business office. During this interaction you inquired about a relationship finance package that would include a business line of credit and business credit card. Your request was discussed with underwriting; however, due to the collateral and limited cashflow on the original request, the banker was under the impression it was agreed upon to remain with the original plan and this inquiry would be revisited again in the future, therefore, no applications were submitted on your behalf at that time.

Additionally, we confirmed you had automatic payments set up for the existing Loan Accounts. The payments were deducted; however, the payment amounts were not complete. This was a known issue of payments being applied as the next scheduled amount rather than unscheduled principal payments. This was corrected and we confirmed that no late notices were sent, no late fees were assessed, nor have the Loan Accounts been reported as delinquent to the credit reporting agencies.

Furthermore, regarding your life insurance that was used as collateral on the Loans Accounts, it was brought to our attention that a breach was identified with the insurance carrier you were utilizing which caused you to switch carriers. We were not informed when the changes were made so the Banker was working with you to get the updated policy information. Due to the life insurance being held as the position of collateral on the Loan Accounts, the loan documents need modifications with updates of the new insurance policy. It was confirmed this was communicated with you and assured this is the only change within the loan documentation. We are urgently requesting the return of the signed loan modification documentation. We are aware that you have obtained an Attorney and we have not yet received the signed documents. The loan modifications expire on October 3, 2024, therefore, if the documents are not signed, the Loan Accounts will go into default.

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

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TTY/TRS device, please Dial 711. We are available Monday through Friday from 8am to 6pm Eastern Standard Time.

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

Sincerely,



Enterprise Client Relations
Office of the President

Enclosure
Loan Modification Documentation

High-Risk: ECR - goes to next state in 61 hours - Assigned to [CLF] ECR Team

NEW

8/10

December 7, 2024 at 9:44 AM EST

0 subscribers

Respond

Assign to me

Reassign Alert

Close Alert

Add Note

Subscribe

Profile

Customer Information

Client ID

Email

CC Client Type

Age

Agent ID

Number of Transfer

Relationship Segment

Tenure

Metadata Information

Response Date (ET)

Survey ID

IPI

CC Interaction Type

Unit

Client IPI

Survey Program

Unique Id

Alert owner

Activity

Alert Assigned

12/07/2024, 9:46:57 AM EST · System Generated

Automatically assigned to [CLF] ECR Team

Alert status set to New

12/07/2024, 9:46:57 AM EST · System Generated

Alert Assigned

12/07/2024, 9:46:57 AM EST · System Generated

Automatically assigned to [CLF] ECR Team

Alert status set to New

12/07/2024, 9:46:57 AM EST · System Generated

Alert Created: High-Risk: ECR

12/07/2024, 9:46:42 AM EST · System Generated

High-Risk: ECR

View Less

Score Report

Net Promoter Scores

Contact Center NPS

8

Contact Center Drivers

Contact Center - Met Expectations

8

Overall Satisfaction with Representative

9

Knowledge of the representative

10

Courtesy of the representative

10

Range of Services

8

Prompt Communication

10

Others

Problem Experienced

Yes

No

Reason for call

Yes

No

Profile Questions - Consumer Relationship

Key Considered as Primary Bank

Yes

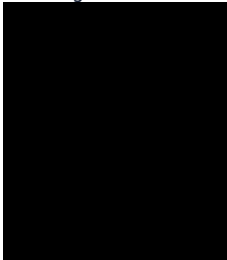
No

71

Page 1 of 2

Segments

Segments



Verbatims



Reason for Likelihood to Recommend Comment

Great service on the inside, but as a senior with disabilities it is hardly worth it to go to the only Key branch in my town. I was once able to deposit a check at just about any ATM in town, but not anymore. Time to look for a more customer-friendly bank with more than one location. Heck, I just realized that I inherited this account from my mother some 40 years ago, and I don't think either one of us has ever been offered anything by the place where we entrust our money. Once the dust settles, I'll start looking elsewhere.

How could KeyBank be better for you?

🗨️ Quit shutting down locations in my town. 🗨️ We are down to one now, and I am a disabled senior. 🗨️ Key clearly does not care about Ann Arbor, MI.

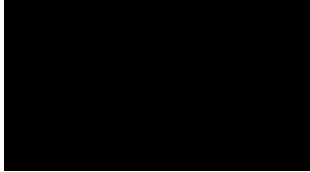
Describe Question

I wanted o know if I could still make a deposit of a check at most ATM's about town. I was told that while I can withdraw from most ATMs in town, I can only make a deposit at a Kwy ATM.




KeyBank
Enterprise Client Relations
127 Public Square
Cleveland, OH 44114

February 4, 2025



Re: KeyBank Case No. 2Q89YJ

Dear 

Thank you for contacting us regarding your recent concern related to the  branch in March 2020.

KeyBank is committed to a strong branch network in the communities we serve tailored to client convenience and preference. We know that while mobile and online options offer tremendous speed and convenience, many clients still want to sit down, face-to-face with our branch professionals to discuss more complex banking needs.

Like any other business, KeyBank continually reviews the structure of its organization to maintain a strong position in the marketplace and remain profitable while continuing to serve the financial needs of our clients. The decision to close or consolidate a branch may be based on decreased client foot traffic due to increased online/mobile banking usage and/or proximity to another KeyBank branch.

KeyBank is committed to making this transition as smooth as possible for our clients. Clients can expect to continue to receive the same high level of service from KeyBank at other nearby branches and will continue to have access to KeyBank's ATM network, telephone banking at 1-800-KEY2YOU, online banking via the internet at key.com, and mobile banking. For clients using a TDD/TTY device, please call 1-800-539-8336. Our clients have many options to connect with KeyBank when, where, and how they prefer.

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

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TTY/TRS device, please Dial 711. We are available Monday through Friday from 8am to 6pm Eastern Standard Time.

Sincerely,



Enterprise Client Relations
Office of the President

High-Risk: ECR - goes to next state in 27 hours - Assigned to [CLF] ECR Team

NEW

2/10

August 5, 2024 at 11:16 AM EST

☆

0 subscribers

Respond

Assign to me

Reassign Alert

Close Alert

Add Note

Subscribe

Profile

Customer Information

App ID (Mobile)

com.keybank.mobile

City

Bridgeport

Digital Survey

Always On - Production iOS Retail

Origin Type

Button

Region

Connecticut

Client Name

Metadata Information

Response Date (ET)

08/05/2024, 11:16 AM

Survey ID

IPI

Unit

KBO iOS

Alert owner

[CLF] ECR Team

Activity

Alert Assigned

08/05/2024, 11:18:37 AM EST · System Generated

Automatically assigned to [CLF] ECR Team

Alert Assigned

08/05/2024, 11:18:37 AM EST · System Generated

Automatically assigned to [CLF] ECR Team

Alert status set to New

08/05/2024, 11:18:37 AM EST · System Generated

Alert status set to New

08/05/2024, 11:18:37 AM EST · System Generated

Alert Created: High-Risk: ECR

08/05/2024, 11:18:26 AM EST · System Generated

High-Risk: ECR

View Less

Score Report

Digital Satisfaction

Digital Satisfaction

1

Custom Parameters

Verbatims

Reason for Score Comment

Formal complaint has been filed with the OCC and I wish my complaint be included in your CRA public comment files.

75

Page 1 of 1

Report Title: Case Details

Run Date and Time: 2024-08-06 10:04:49 Eastern Daylight Time

Run by: [REDACTED]

Table name: sn_customerservice_case

Case

Number:	CS0337921	Bank Case Status:	Active
Bank/Institution:	KeyBank National Association	Bank Case Type:	Complaint
Bank Assignee:			
Bank Note:			

Date Information

Origination Date:	2024-08-05 11:13:48	Extension Request Date:	
Sent to Bank:	2024-08-06 09:16:43	Recontact Date:	
Due date:	2024-08-20 23:59:59	Recontact Counter:	0
Days in Bank Inbox:	48 Minutes		

Consumer Information

Consumer First name:	[REDACTED]	Consumer Street:	[REDACTED]
Consumer Middle name:	[REDACTED]	Consumer City:	[REDACTED]
Consumer Last name:	[REDACTED]	Consumer Zip / Postal code:	[REDACTED]
Consumer Phone (Primary):	[REDACTED]	Consumer Country:	[REDACTED]
Consumer Email:	[REDACTED]		
Consumer International Address:			

Representative Information

Source Interaction Representative First Name:		Source Interaction Type of Relationship:	Not Applicable (Skip this section)
Source Interaction Representative Middle Name:		Source Interaction Authorization:	
Source Interaction Representative Last Name:		Source Interaction Representative Street:	
Source Interaction Representative Email:		Source Interaction Representative City:	
Source Interaction Representative Phone:		Source Interaction Representative Zip / Postal code:	
		Source Interaction Representative State or Territory:	
		Source Interaction Representative Country:	United States of America
Source Interaction Representative International Address:			

Additional Information

Source Interaction Type of Account:	Deposit Accounts (Checkings, Savings), Loan Product (Mortgage, Consumer, Home Equity)	Source Interaction Institution Response:	Yes
Source Interaction Attempted Resolution:	Yes	Source Interaction Institution Response Date:	2024-08-05
Source Interaction Date Resolution Attempted:	2024-08-05	Source Interaction Institution Response Method:	Phone
Source Interaction Attempted Resolution Method:	Phone		

Appraisal Complaint

Source Interaction Business Name (if Applicable):	Source Interaction Are you employed by the subject of your complaint?:	
Source Interaction Who are you? Please select the appropriate value.:	Source Interaction Address of the Property Involved:	
Source Interaction Please specify other consumer:	Source Interaction Attempted Resolution:	Yes
Source Interaction Who are you complaining about?:	Source Interaction Attempted Resolution Contact:	
Source Interaction Please specify other complaint target:	Source Interaction Attempted Resolution Company or Agency:	
Source Interaction What is the nature of your complaint?:		
Source Interaction Please specify other complaint category:		

Complaint Details

Source Interaction Complaint Information:

The bank is not properly disclosing holds on ACH transactions and claiming they may take 4 business days to clear and holding funds for 5 business days in violation of their Funds availability policy. They refused the remove the hold and the funds were removed from my other acct on 8/2. I processed the transaction on the 1st

Entity Name

Source Interaction Institution Name:	KeyBank	Source Interaction Institution Street:	127 Public Square
Source Interaction Institution Phone:		Source Interaction Institution City:	Cleveland
Source Interaction Contact Name:		Source Interaction Institution State or Territory:	OH
Source Interaction Contact Title:		Source Interaction Institution Zip / Postal code:	44114

Resolution

Compensation Amount:	\$0.00
Submission notes:	

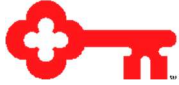
Related List Title: Attachment (CAMP) List

Table name: u_attachment_meta

Query Condition: Number = CS0337921 AND Type in (Bank Correspondence, Consumer Correspondence, Consumer Referral, Email Consumer)

Sort Order: Type in ascending order

None



KeyBank
Enterprise Client Relations
127 Public Square
Cleveland, OH 44114

August 16, 2024

[REDACTED]

RE:

[REDACTED]

OCC Case No. CS0337921
KeyBank Case No. 2N44J6

Dear

[REDACTED]

This letter is in response to your concern filed with the Office of the Comptroller of the Currency. We regret the frustrating experience you've had and would like to share the results of our investigation.

On August 1, 2024, you submitted a [REDACTED] transfer from an external account to the Account via online banking. Before this transfer was submitted, you were provided a disclosure within online banking that stated:

"A transfer may take up to 4 business days to process".

The funds from this transfer were made available to you on August 7, 2024, and they successfully posted to your Account that day. Per your request, both the Account and the Line of Credit were closed.

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

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TTY/TRS device, Dial 711. We are available Monday through Friday from 8 a.m. to 6 p.m. Eastern Standard Time.

Sincerely,

[REDACTED]

Enterprise Client Relations
Office of the President

[REDACTED]

From: [REDACTED]
Sent: Saturday, May 11, 2024 10:35 AM
To: [REDACTED]
Subject: FW: Purchase contract
Attachments: image001.png; image002.png; image003.png; image001.png

Here you go.



Begin your home purchase
prequalification or refinance
application here.

Get Started

KeyBank 

 Home Lending
2022 President's Club

From: [REDACTED]
Sent: Saturday, May 11, 2024 8:32 AM
To: [REDACTED]
Subject: Re: Purchase contract

Stop lying to me! What do you mean you have a document saying I get [REDACTED] but it doesn't have my name or any information on it about it nor who its from??? [REDACTED] had no problems with it- why , because my name is clearly on it, it clearly says who it is from, it explains the benefits which includes the "CASHOUT PROGRAM" im in, it clearly says i will receive it for slightly over 3yrs, it clearly shows the date it was mailed to me, it clearly says I had reverified everything with the provider which is why it was renewed for another 3 years [plus [REDACTED] got the previous 3yrs award letter from me, I have her emails thanking me for providing e erything for her and the underwriters!]. My folder was complete and verified when [REDACTED] had me, you don't know [REDACTED], you don't even know how to file for grants! My agent laughed at your [REDACTED], she kept forewarning me not to use you as a lender, you [REDACTED] my contract! Keybank has a past history of doing this [REDACTED] to minority buyers which resulted federal lawsuits! And im suing you and keybank...

[REDACTED]

Ps. And everyone knows how racist Cincinnati Ohio is!

On Fri, May 10, 2024, 1:41 PM [REDACTED] wrote:

[REDACTED]

I'll be working on getting your file into the system with the updated property address and details, and then send over doc's for you to review and sign. I'm going to need some additional information from you. I've got your SSI information in your file and a form showing you get and additional [REDACTED] but that form doesn't show who or what this is for. It shows a case # but no name or identifying markers. I need something showing this benefit is coming to you.

Also, we'll need to see where the earnest money came from that's listed on the purchase contract of [REDACTED]. For that we'll need 2 months of bank statements show where those funds were deposited.

Also what was the name of the grant programs you were saying you were qualified for you sent it to me in a text but I delete my text messages because per security protocols I can't have customer information on my personal cell.

Also the contract that the realtor sent me wasn't signed by anybody. I've reached out to [REDACTED] your realtor to see if [REDACTED] can send me the signed copy because I can't do anything until I get that.

We need to get started on those.

Thanks,

[REDACTED]



From: [REDACTED]

Sent: Tuesday, May 7, 2024 3:31 PM

To: [REDACTED]

Subject: Purchase contract

WARNING: This email originated externally. Exercise caution. Think before clicking links or opening attachments.

Hi [REDACTED],

Sir today I signed a purchase contract for the purchase amount of [REDACTED]. I'd appreciate it if you could please give me a call back at your earliest convenience thank you.

[REDACTED]

[REDACTED]

KeyCorp Public

This communication may contain privileged and/or confidential information. It is intended solely for the use of the addressee. If you are not the intended recipient, you are strictly prohibited from disclosing, copying, distributing or using any of this information. If you received this communication in error, please contact the sender immediately and destroy the material in its entirety, whether electronic or hard copy. This communication may contain nonpublic personal information about consumers subject to the restrictions of the Gramm-Leach-Bliley Act. You may not directly or indirectly reuse or redisclose such information for any purpose other than to provide the services for which you are receiving the information.

[REDACTED]

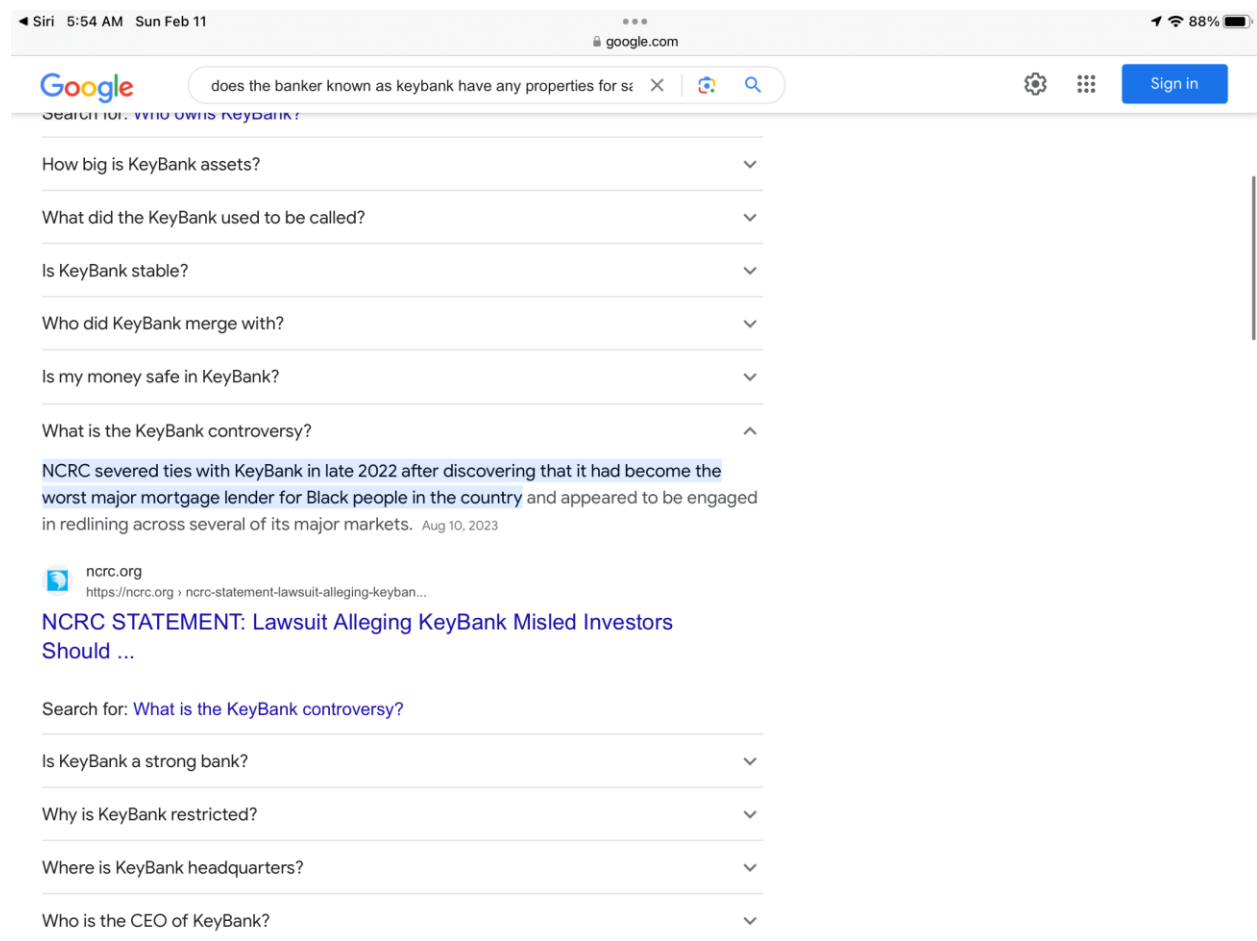
If you prefer not to receive future e-mail offers for products or services from Key, send an email to mailto:[REDACTED] with 'No Promotional E-mails' in the SUBJECT line.

████████████████████
████████████████████
██

Subject: Redlining Black Clients

WARNING: This email originated externally. Exercise caution. Think before clicking links or opening attachments.

██████████ up until you became my loan officer there were no discrepancies with my financial documentation, but you alleged it lacks a source, etc...this is peculiar because ██████████ sent everything to the underwriters and issued me a preapproval letter with instructions to shop confidentially for a home. Are you attempting to redline me?





KeyBank
Enterprise Client Relations
127 Public Square
Cleveland, OH 44114

June 12, 2024

[REDACTED]
[REDACTED]
[REDACTED]

RE: Home Lending Pre-Qualification Application Nos. [REDACTED]
KeyBank Case No. 2LQ73V

Dear [REDACTED]

This letter is in response to your issue regarding your recent home lending pre-qualification applications. We regret the frustrating experience you've had and would like to share the results of our investigation.

Our review found that you initially inquired about home lending options on May 22, 2023. Pre-qualification letters were sent to you on May 23, 2023 and September 8, 2023. As noted in the Pre-qualification letter *"Please note that this letter is an early indication of the mortgage loan that you may qualify for, this letter does not represent a commitment to lend. A commitment to lend is based on your submission of a formal loan application and is subject to credit and collateral approval."* Additionally, multiple communications between you and the KeyBank Mortgage Loan Officer noted that this was a pre-qualification. The letters also advised of the expiration date of January 6, 2024. As no property was presented and the application process did not move forward, the pre-qualification application expired on January 8, 2024.

Furthermore, you inquired about home lending options a second time, with a different KeyBank Mortgage Loan Officer on January 29, 2024. Pre-qualification letters were sent to you on February 1, March 4, March 11, April 15, May 8, and May 14, 2024. Letter updates were sent whenever you presented updated purchase information. The letters all have different loan products, different purchase price amounts and different loan amounts due to different down payment amounts required for different loan products. The same disclosure is presented on each letter advising that this does not represent a commitment to lend. As noted in the letters, the current pre-qualification application expired on May 28, 2024.

During a pre-qualification application, complete income documentation is not required. Once you are ready to submit an application, income information is needed to make a credit decision. Income must be sourced to the borrower and must include name of borrower and source on all documentation for verification by the bank.

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

If you wish to submit a Mortgage Loan Application on a specific property, please contact your local KeyBank branch, call our Home Lending Center at 1-800-539-0018 or you can reach us at www.key.com/mortgage.

As also noted in the pre-qualification letters, “When you’re ready to submit your loan application: We will need to confirm your information and review required documentation before we can make a decision on your application. In addition, you may be required to provide additional documentation based on the type of loan you choose or your source(s) of income. Your property must meet eligibility requirements which will require a review of documentation such as an appraisal and title report.”

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

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

<https://www.key.com/about/corporate-responsibility/cr-overview.html>

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. Dial 711 for TTY/TRS. We are available Monday through Friday from 8:00 A.M. to 6:00 P.M. (EST).

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

Sincerely,



Enterprise Client Relations
Office of the President

Enclosures

- Prequalification Letter dated May 23, 2023
- Prequalification Letter dated September 8, 2023
- Prequalification Letter dated February 1, 2024
- Prequalification Letter dated March 4, 2024
- Prequalification Letter dated March 11, 2024
- Prequalification Letter dated April 15, 2024
- Prequalification Letter dated May 8, 2024

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(5 messages)

To: KeyBank

I o l key bank is the worst bank in america right now

03/16/2024 09:24:25

Good Morning , is there something we can do for you? Happy to help.^CH

KeyBank • 03/16/2024 09:25:20

To: KeyBank

KeyBank Not really I was just making a statement

03/16/2024 09:25:50

Feel free to send us details of what happened if you change your mind and would like assistance. Enjoy your weekend in the meantime!^CH

KeyBank • 03/16/2024 09:27:05

To: KeyBank

KeyBank You literally have closed all local banks around my area. Somehow you partnered with the federal government at the same time closing tons of branches. It is impossible to send money or to transfer large amounts of money quickly through you guys.

03/16/2024 09:28:01



2KTSRU

KeyBank has made attempts to provide assistance with the individual's concerns. KeyBank has not received contact or identifying information from the individual.

I'm not shocked but disappointed that nothing tangible is being done. I'm definitely closing my @keybank business account though.

1hr



MAJOR story out this AM from my colleague [REDACTED]

A new analysis of federal data reveals that historic redlining is still happening in Buffalo & WNY today. Black applicants are rejected for mortgages at 2x the rate of everyone else:

<https://t.co/LHkWRCrm7S>

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